



Hmong College Prep Academy

Lead In Water Safety Program

Managed by HERC (Hmong Education Reform Company)

Hmong College Prep Academy

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Saint Paul, MN 55108

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Purpose

HERC (Hmong Education Reform Company) is dedicated to ensuring a safe and healthy learning and working environment for all students and staff members. We understand the significance of safeguarding our students and staff against potential lead exposure, and we will achieve this through the following model plan. The subsequent Lead in Water Standard of Operation is offered as a reference to assist HCPA employers and employees in adhering to the regulations stipulated in Minnesota Statute 121A.335, the requirements established by the Minnesota Department of Health (MDH) and the Minnesota Department of Education concerning lead levels in drinking water within public schools. It also aims to provide other valuable insights.

According to [Minnesota Statute 121A.335](#), public school buildings serving students from kindergarten through grade 12 must conduct lead testing in potable water sources (drinkable water) once every five years.

HERC (Hmong Education Reform Company) will annually review this standard to assess specific requirements applicable to the District and make adjustments to the program accordingly.

This standard of operation is tailored to suit the distinctive needs of Hmong College Prep Academy.

It is designed to align with the regulations of the State of Minnesota.

In the event of conflicts or disparities between this standard of operation and the requirements of the State of Minnesota, the State's regulations shall take precedence.

Lead in Water Program

The Hmong Education Reform Company (HERC) is engaged in the testing of water for lead in all HCPA Schools and facilities, aiming to detect potential sources of drinking water with elevated lead levels and ensuring that the District has access to safe, lead-free drinking water.

In order to assess lead levels, samples are gathered at schools following the guidelines set forth by the EPA and the Minnesota Department of Health (MDH). The EPA and MDH have established a standard of 20 ppb for lead in school drinking water.

The district goal is to provide lead safe drinking water sources throughout all its facilities. This will include identification of water sources that are considered drinking sources, water testing, and follow-up procedures.

This program is modeled after the Minnesota Department of Health's "[Reducing Lead in Drinking Water: A Manual for Minnesota's Schools.](#)" The program identifies potable water sources, sources of lead, and outlines follow-up procedures for fixtures testing high in lead content.

Preparation and Planning:

- It might be necessary to collect samples over several days to ensure that only initial draw samples are obtained.
- On the day before sampling, the sampling tap should be used normally.
- The night before sampling, take measures to prevent the fixture from being used, such as displaying a "Do Not Use" sign.
- Allow a minimum of six hours without using the sampling taps, with MDH recommending not exceeding 18 hours.
- Do not remove aerators or attachments.

Sample Collection

- Step 1:
 - Gather a 250 mL initial draw sample. Begin sampling at taps closest to the point where water enters the building to avoid inadvertently flushing other taps.
- Step 2:
 - If the result from Step 1 indicates high lead levels, collect a 30-second flush sample to assess whether the lead is originating from the plumbing behind the fixture or if flushing can reduce lead levels. To obtain a 30-second flush sample, after the water has been stagnant (as in Step 1), open the tap and allow water to run for 30 seconds before filling the sample container.

Drinking water sources include:

- Water dispensers (excluding bottled)
- Restroom sinks
- Office sinks
- Sinks in classrooms (excluding science lab rooms in junior and senior highs)

- All kitchen area sources
- All nurse/health area sources
- Drinking fountains
- Boiler Room sinks and initial draws
- Facility Kitchen

Hydration Stations

The HCPA District provides access to chilled, filtered water by installing a minimum of two hydration stations on every level of the school building, courtesy of the Facilities Department.

High Test Results

If fixtures tested above the 20 ppb threshold require a subsequent sample, as described earlier, after running water for 15 seconds. If the analysis of the sample results in a measurement equal to or less than 20 ppb, it is deemed safe for drinking at any time as long as it has been flushed for 15 seconds.

Fixtures that do not pass the "flush test" must either be deactivated until the fixture is replaced or labeled as not suitable for consumption.

Corrective Actions

The affected water fixtures were turned off, and "Out of Order" notices were posted to ensure that no one utilized the water until the issue was resolved. The Facilities Department addresses fixtures with elevated lead levels by replacing them with new fixtures as part of the remediation process.

Removal of Lead

There are several choices for eliminating lead sources, including:

1. Take the tap/fixture out of service. If the tap is infrequently used, it can be disconnected or removed from the water supply line. However, ensure that this action does not violate any local building code requirements.
2. Substitute it with a lead-free fixture or plumbing component following the Reduction of Lead in Drinking Water Act.
3. If the existing tap is suspected to be the source of contamination, replace it with a lead-free tap.
4. Replace other potential lead sources, such as lead pipes, lead solder joints, and brass plumbing components, with materials that are free of lead.

Flushing:

Flushing represents a best management practice employed to mitigate lead in water by regulating the period during which water remains stagnant. The more extended the period water remains unused in a system, the higher the likelihood of elevated lead levels in the water. The flushing procedure effectively removes water that has been stationary in the system overnight before it can be consumed.

In cases where fixtures test above 20 ppb, a subsequent "flush" sample should be collected and tested using the Analyze Flurimeter. In this context, a flush test entails running the fixture for 15 seconds before obtaining a new sample in a fresh 250 mL container. If the analysis of the flush sample indicates a lead level below 20 ppb, the district requires the tap to be flushed for 15 seconds before using it for consumption. Signs displaying the message: **"PLEASE FLUSH FOR 15 SECONDS BEFORE CONSUMPTION"** will be placed near affected sinks, and the Head Engineers will be notified.

Sample Labeling

Each sample shall be labeled with the following:

Hmong College Prep Academy

Date of sampling

Room Number, Sink Number

*For rooms that contain more than one sink, sinks shall be sampled in a clockwise order with the first sink being that closest to the left of the door.

Communication of Results

HCPA keeps up-to-date records of lead-in-water testing data for each school, accessible on the HCPA website at <https://www.hcpak12.org/Page/1558>. This webpage offers the latest laboratory reports on lead in water for every school. Furthermore, following the completion of testing in each school, school principals will receive notifications regarding the lead-in-water results specific to their school. Additionally, a copy of the HCPA Lead in Water Safety Program is available on the website for reference.

Record Keeping Requirements

HERC will retain management records of testing outcomes, which can be made available upon request. Testing results will also be made accessible on the Hmong College Prep Academy website.

Contact Information

Any questions, concerns, comments, or other information regarding the District Lead in Water can be directed to:

Hmong Education Reform Company

Board Chair: Luke Mead Phone: 651.209-8002

Email: Luke.Mead@hcpak12.org

Resources

Minnesota Statue: <https://www.revisor.mn.gov/statutes/cite/121A.335>

Commissioner's Model Plan:

<https://www.health.state.mn.us/communities/environment/water/docs/pbschoolguide.pdf>