

LEAD IN DRINKING WATER TESTING AND REMEDIATION PLAN

For Minnesota Charter Schools

School Name:

Swan River Montessori Charter School

Site Address(es):

500 Maple Street

Monticello, MN 55369

Date Adopted: *5.19.26*

Next Review Date:

Plan Coordinator: *Annette Vemuri, Executive Director*

Based on:

Minnesota Department of Health Technical Guidance (February 2025)

Minnesota Statutes, Section 121A.335 (as amended 2023)

U.S. EPA 3Ts for Reducing Lead in Drinking Water (2018)

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Quick-Start Checklist for School Leaders

Use this checklist to verify that your school has completed all required steps under Minnesota Statute 121A.335. Check each item as you complete it. This plan is your foundation; refer to each numbered section for detailed procedures.

Before You Begin

- ☐ Assign a Lead Testing Coordinator (see Section 3)
- ☐ Obtain board or administrative approval to adopt this plan
- ☐ Contact MDH at (651) 201-4700 or your public water system to understand your incoming water source
- ☐ Determine whether your school will use an accredited laboratory or certified field analyzer
- ☐ Identify a budget for testing, potential remediation, and recordkeeping

Year 1 – First Testing Cycle

- ☐ Complete fixture inventory and assign priority levels (Section 5)
- ☐ Develop 5-year testing schedule (Section 4)
- ☐ Collect first-draw samples from all HIGH priority fixtures (Section 6)
- ☐ Send samples to accredited lab or test with approved field analyzer (Section 7)
- ☐ Interpret results using the action threshold table (Section 8)
- ☐ If any result is 5 ppb or higher: immediately take fixture out of service and begin remediation (Section 9)
- ☐ Notify parents within 30 days if remediation cannot be completed in time (Section 10)
- ☐ Post results on school website; include notice in school handbook (Section 10)
- ☐ Report results to MDH by July 1 (Section 11)

Ongoing – Every Year

- ☐ Test remaining fixtures per 5-year schedule
- ☐ Send annual parent notice with testing and remediation summary
- ☐ Update school website with current results
- ☐ Report to MDH by July 1 each year
- ☐ Review and update the Water Management Plan
- ☐ Clean faucet aerators at least quarterly
- ☐ Retain all records for at least 15 years

Section 1: Purpose and Background

1.1 Purpose of This Plan

This Lead in Drinking Water Testing and Remediation Plan (the Plan) establishes a systematic, legally compliant program for testing drinking water fixtures, responding to elevated lead levels, communicating results, and maintaining records. The Plan has been developed by:

Swan River Montessori Charter School	
500 Maple Street Monticello, MN 55369	503 Maple Street Monticello, MN 55369

This Plan is adopted in accordance with Minnesota Statutes, Section 121A.335 and is based on the Minnesota Department of Health (MDH) and Minnesota Department of Education (MDE) Technical Guidance: Reducing Lead in Drinking Water in Minnesota Schools and Child Care Facilities (February 2025).

The goal of this Plan is to protect the health of students and staff by identifying and reducing exposure to lead in drinking water. Lead has no safe level of exposure for children. By testing, remediating, and communicating results, this school meets its legal obligations and its commitment to a healthy learning environment.

1.2 Why Lead in Drinking Water Matters

Lead is a toxic metal that can harm children even at very low levels of exposure. Unlike many health hazards, lead builds up in the body over time. Children under six years old face the greatest risks because their brains and nervous systems are still developing. However, school-age children also remain vulnerable.

Health effects of lead exposure in children can include:

- Reduced IQ and learning difficulties
- Attention and behavioral problems
- Hearing impairments
- Developmental delays
- Damage to the brain, kidneys, and red blood cells

Lead gets into drinking water primarily through the corrosion of plumbing materials (pipes, solder, fittings, and fixtures) not from the water source itself. Schools face particular risk because water often sits unused overnight, over weekends, and during school breaks. Stagnant water has more time to absorb lead from plumbing materials, making first-draw testing especially important.

The only way to know if lead is present in drinking water is to test it. This Plan ensures that testing happens on schedule, that elevated results are addressed promptly, and that families and staff are informed.

1.3 Scope of This Plan

This Plan applies to all drinking water fixtures at the following school building(s):

Swan River Montessori Charter School	
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Drinking water fixtures covered by this Plan include all taps, faucets, drinking fountains, and water outlets used for drinking or food preparation by students or staff. Fixtures used only for non-consumptive purposes (such as bathroom hand-washing sinks, hose bibs, custodial sinks, and laboratory faucets) are not routinely tested but must be clearly labeled as not for drinking.

Section 2: Regulatory Requirements

2.1 Minnesota Statute 121A.335 – Primary Legal Authority

Minnesota Statutes, Section 121A.335 is the primary law governing lead testing in Minnesota public and charter school drinking water. The statute, as amended in 2023, requires charter schools to:

1. Adopt this MDH/MDE Technical Guidance model plan or develop an equivalent alternative plan.
2. Create a testing schedule covering all school buildings where water may be consumed by students, beginning no later than July 1, 2018, with all fixtures tested at least once every five years.
3. Immediately discontinue use of any fixture where lead is found at 5 parts per billion (ppb) or higher, until the source of lead is remediated and a retest confirms the level is below 5 ppb. (Effective August 1, 2023.)
4. Notify parents within 30 days of receiving a result at or above 5 ppb, unless remediation is completed and confirmed below 5 ppb within that time.
5. Send an annual notice to parents that includes the testing and remediation plan, how to find results, and a description of remediation efforts. Post this information on the school website and include it in the school handbook.
6. Report test results and remediation activities to the Minnesota Department of Health (MDH) by July 1 each year, starting July 1, 2024.
7. Retain records of lead testing results and remediation activities for at least 15 years.

2.2 Water Management Plan Requirement

Effective July 1, 2024, Minnesota Statute 121A.335(b) also requires charter schools to revise their plans to include policies and procedures for maintaining consistent water quality throughout school facilities. A Water Management Plan documents routine strategies used in each building to reduce lead exposure. This school's Water Management Plan is incorporated in Section 12 of this document.

2.3 Additional Federal Requirements

In addition to Minnesota state law, charter schools should be aware of the following federal requirements and guidance:

- Lead Contamination Control Act (1988): Requires identification and voluntary reduction of lead in school drinking water. Schools are encouraged to follow EPA recommendations.

- Reduction of Lead in Drinking Water Act (2014): Mandates that all new pipes, fittings, and fixtures installed in drinking water systems be lead-free, defined as no more than 0.25% lead in wetted surfaces.
- U.S. EPA 3Ts Guidance (Training, Testing, and Taking Action, 2018): A federal guidance document that provides detailed strategies for school lead programs. This Plan is consistent with the 3Ts framework.
- Safe Drinking Water Act, Lead and Copper Rule: Applies primarily to public water systems. Schools served by a private well with 25 or more daily users are classified as a Nontransient Noncommunity Public Water System and must contact MDH for additional testing requirements.

2.4 No Safe Level of Lead

Minnesota has set 5 ppb as the mandatory remediation threshold. However, the Centers for Disease Control and Prevention (CDC) and the U.S. EPA have determined that there is no known safe level of lead exposure for children. This school follows a tiered approach: mandatory action at 5 ppb or above, with recommended precautionary steps for any detectable level of lead. See Section 8 for the full action threshold table.

Section 3: Roles and Responsibilities

Clear assignment of roles is essential for a successful lead testing program. The following table identifies each role, its key responsibilities, and the person assigned at this school. Update this table each time roles change.

Role	Key Responsibilities	Assigned To
Lead Testing Coordinator	Oversees the entire testing program; coordinates scheduling, lab contacts, result review, and reporting to MDH.	<i>Annette Vemuri Executive Director</i>
Facilities Manager / Custodial Staff	Conducts fixture inventory; collects water samples; implements flushing and maintenance; places "Do Not Use" signs.	<i>Kirsten Host Operations Manager</i>
School Administrator / Principal	Approves the plan; ensures staff are trained; communicates with families and the board; signs off on remediation actions.	<i>Annette Vemuri Executive Director</i>
Administrative Support	Maintains records, logs, and files; tracks reporting deadlines; updates school website with results.	<i>Kirsten Host Operations Manager</i>
External Lab Contact	Provides sample bottles, chain-of-custody forms, and certified lead analysis.	<i>120 Water 1-800-674-7961</i>

Role	Key Responsibilities	Assigned To
School Board	Adopts this plan; allocates resources for testing and remediation; receives annual compliance update.	<i>SRMCS School Board</i>

3.1 Training Requirements

All staff involved in sample collection must be familiar with the sampling procedures in Section 6 before conducting any testing. The Lead Testing Coordinator is responsible for ensuring that:

- Sample collectors read and understand the collection procedures in this Plan.
- Staff are aware of MDH guidance and the EPA 3Ts Toolkit.
- Any contractor or external sampler has appropriate qualifications.
- Training is documented and records are kept on file.

Training records are maintained in the school office by the Lead Testing Coordinator and are available upon request. Training related to the Lead in Drinking Water program was conducted by the Minnesota Department of Health (MDH), with instruction provided by Caroline Olstad, Lead in Drinking Water Specialist, Drinking Water Protection Section

Section 4: Sampling Plan Development

4.1 Overview

A sampling plan identifies which fixtures will be tested, in what order, and on what schedule. Minnesota law requires that all drinking water fixtures be tested at least once every five years. This school will prioritize higher-risk fixtures in the earliest years of the testing cycle.

4.2 Priority Levels for Fixture Testing

MDH recommends that schools assign a priority level to each fixture and test higher-priority fixtures first. Priority is based on the vulnerability of the people who use the fixture and how frequently it is used for drinking or food preparation.

HIGH PRIORITY: Fixtures used by children under age six, or used in food preparation for young children. Examples: drinking fountains and kitchen sinks in early childhood classrooms, the school nurse's office sink, and the main kitchen.

MEDIUM PRIORITY: Other fixtures regularly used for drinking or cooking. Examples: teacher lounge sinks, classroom sinks, and food service prep areas.

LOW PRIORITY: Fixtures that could reasonably be used for drinking but are not regularly used for that purpose.

4.3 Five-Year Testing Schedule

The table below sets this school's planned testing schedule across the first five-year cycle. All fixtures must be tested at least once in each five-year cycle. After completing the first cycle, the schedule repeats. Fixtures where lead was previously detected at any level should be prioritized for retesting.

Year	Target Fixtures	Priority Level	Planned Testing Date	Staff Responsible	Notes
Year 1	Highest-priority fixtures (early childhood rooms, nurse's office, kitchen sinks, drinking fountains used by young children)	HIGH	Water was sampled on 5/14. Waiting on lab results	Kirsten Host	<i>Must be tested first per MDH guidance</i>
Year 2	Regularly-used classroom sinks, teacher lounge fixtures, food service prep areas	MEDIUM	Water was sampled on 5/14. Waiting on lab results	Kirsten Host	<i>Continue until all medium-priority fixtures sampled</i>
Year 3	Remaining fixtures accessible for consumption but less frequently used	LOW	Water was sampled on 5/14. Waiting on lab results	Kirsten Host	<i>Make-up year may be used if needed</i>
Year 4	Make-up year for any missed fixtures; confirm all fixtures tested at least once	MAKE-UP	Water was sampled on 5/14. Waiting on lab results	Kirsten Host	<i>All fixtures must be tested by end of Year 5</i>
Year 5	Full retesting cycle begins; retest any fixtures with prior detections	RETEST CYCLE	Water was sampled on 5/14. Waiting on lab results	Kirsten Host	<i>Repeat cycle every 5 years per Minn. Stat. 121A.335</i>

4.4 Scheduling Logistics

When planning sampling dates, keep the following in mind:

- Test during a period of normal water usage. Do not test during extended closures or following unusual periods of inactivity.
- Do not flush fixtures in advance of sampling unless flushing is already part of your daily routine.
- Water must be stagnant at each fixture for a minimum of 8 hours, but no more than 18 hours, before sample collection.
- Samples should be collected before building occupants arrive, as the first-draw protocol requires the fixture to be unused since the prior evening.
- Large schools may need to sample over multiple days to collect all first-draw samples without accidentally flushing a fixture.
- Coordinate with your accredited laboratory to obtain sample bottles, chain-of-custody forms, and instructions at least two weeks before your planned sampling date.

Initial sampling of all fixtures was conducted on May 14, 2026. The school is currently awaiting results from 120Water. Test results are also shared directly with the Minnesota Department of Health (MDH).

4.5 Testing Method

This school will use the following method for lead analysis:

Swan River Montessori used an accredited laboratory, 120 Water, for our water sampling and analysis, as recommended by the Minnesota Department of Health (MDH).

Option 1: Analysis by Accredited Laboratory

Accredited laboratories provide chain-of-custody documentation, EPA-approved analytical methods, and independent verification of results. A list of accredited Minnesota laboratories is available at www.health.state.mn.us/labsearch (select Program: Safe Drinking Water; Analyte: Lead; Matrix: Drinking Water).

Option 2: Analysis Using Field Analyzers

Field analyzers provide faster results and may be cost-effective for large numbers of samples. Any field analyzer used must be EPA-approved for total lead measurement in drinking water and must be properly calibrated and maintained per the manufacturer's specifications. Calibration records must be retained.

Whichever method is chosen, the detection limit must be 2 ppb or lower. Report all results in parts per billion (ppb), which is equivalent to micrograms per liter (ug/L).

Section 5: Fixture Inventory

5.1 Purpose of the Inventory

An accurate fixture inventory is the foundation of the testing program. The inventory identifies every fixture that provides drinking water or is used for food preparation, assigns a priority level, and tracks the testing and remediation history of each fixture.

5.2 Conducting the Inventory

The Lead Testing Coordinator or designated Facilities staff should walk through each building and document every fixture. Follow these steps:

1. Walk through all areas of the building, including kitchens, classrooms, hallways, gymnasiums, staff rooms, nurse's offices, and any auxiliary spaces.
2. Identify every point where water is accessed for drinking or food preparation. This includes drinking fountains, kitchen sinks, classroom sinks used for drinking, and water coolers.
3. Note fixtures that should NOT be tested but should be labeled: bathroom sinks, hose bibs, laboratory faucets, and custodial sinks. These must be clearly marked with signage — "Not for Drinking" — in plain language and with pictures where children may not read.
4. Check all drinking fountains to confirm they are not on the EPA list of banned lead-lined coolers from 1988. If any are found on that list, remove them from service immediately.
5. Only include cold water fixtures for drinking water testing. Hot water should never be used for drinking or food preparation because heat increases lead release.
6. Assign each fixture a unique ID (such as F-001, F-002) and record its location, type, and priority level.
7. Update the inventory whenever fixtures are added, removed, or modified.

5.3 Fixture Inventory Table

Complete the table below for all drinking water fixtures. Add rows as needed. This table should be updated after each testing event and reviewed annually.

Fixture ID	Location / Room	Type	Priority	Cold Water Only?	Date Sampled	Lead Result (ppb)	Action Taken
101	Downstairs Classroom	Sink		no	05/14/2026	[Result]	[Describe action or N/A]
201	Ms. Ashleys room Sink	Sink		no	05/14/2026	[Result]	[Describe action or N/A]
202	Staff kitchen Sink	Sink		no	05/14/2026	[Result]	[Describe action or N/A]
203	Amy J Room Sink	Sink		NO	05/14/2026	[Result]	[Describe action or N/A]
204	Sharons Room Sink	Sink		no	05/14/2026	[Result]	[Describe action or N/A]

Fixture ID	Location / Room	Type	Priority	Cold Water Only?	Date Sampled	Lead Result (ppb)	Action Taken
205	Ms. Nicoles room sink	sink		no	05/14/2026		
206	Right fountain near 503 doors	fountain		yes	05/14/2026		
207	Left fountain near doors for 503 building	fountain		yes	05/14/2026		
208	Amy S room sink	sink		no	05/14/2026		
209	Julies room sink	sink		no	05/14/2026		
210	Right fountain near bathroom	fountain		yes	05/14/2026		
211	Bottle filler	fountain		yes	05/14/2026		
212	Middle fountain near bathroom	fountain		yes	05/14/2026		
213	Left fountain near bathrooms	fountain		yes	05/14/2026		
301	Left fountain 503 building	fountain		yes	05/14/2026		

Fixture ID	Location / Room	Type	Priority	Cold Water Only?	Date Sampled	Lead Result (ppb)	Action Taken
302	Right fountain 503 building	fountain		yes	05/14/2026		
303	Staff kitchen 503 building	sink		no	05/14/2026		

We do not have a building floor plan available to attach. However, all locations and room descriptions provided accurately identify where samples were collected.

Section 6: Sampling Procedures

6.1 First-Draw Sampling – Overview

Minnesota requires first-draw tap sampling for lead testing. First-draw means the sample is collected from a fixture that has not been used or flushed for at least 8 hours (overnight), but no more than 18 hours. This method captures the water that has had the most contact with plumbing materials and is most likely to contain elevated lead levels.

Always use only cold water when collecting samples. Never collect a lead sample from a hot water fixture.

6.2 Preparation – The Day and Night Before Sampling

1. Confirm that the building has had normal water usage the day before sampling. Do not conduct pre-sampling flushing unless flushing is already a daily part of building operations.
2. The night before sampling, hang a "Do Not Use" sign on each fixture to be tested. This ensures water remains stagnant for the required time.
3. Record the time the fixture was last used. The sample must be collected 8 to 18 hours after last use.
4. Do not remove aerators or strainers from fixtures before sampling.
5. Prepare your sample bottles and chain-of-custody forms the night before if using a lab. Label each bottle with the fixture ID and planned sample location.

6.3 Sample Collection – Step by Step

Always begin sampling at fixtures closest to where water enters the building. This prevents accidentally flushing fixtures further down the line. Work outward from the main entry point.

Part 1 – Initial First-Draw Sample (Required for All Fixtures)

1. Put on clean, nitrile gloves before handling sample bottles or touching fixtures.
2. Remove the "Do Not Use" sign from the fixture.
3. Without flushing or turning on the water first, place the 250 mL sample bottle directly under the faucet or fountain and fill it completely from the very first flow of water. This is your first-draw sample.
4. Cap the bottle immediately. Do not touch the inside of the bottle or cap.
5. Record on the chain-of-custody form: fixture ID, date, time, sampler name, stagnation time, and sample number.
6. Move to the next fixture, working away from the water entry point.

Part 2 – Flushed Follow-Up Sample (Recommended When Results Are Elevated)

If Part 1 results come back at or above 5 ppb, collect a 30-second flush sample from the same fixture to help identify whether lead is coming from the fixture itself or from pipes further back in the system. This step is optional during initial testing but recommended when investigating high results.

1. After the stagnation period (as in Part 1), turn on the fixture and allow water to run for exactly 30 seconds.
2. Fill a second 250 mL sample bottle from the running water.
3. Label this bottle as a "flush sample" for the same fixture ID.

Note: If you want to collect both Part 1 and Part 2 samples at the same time (for efficiency), you may do so. This can reduce the total number of sampling trips needed and speeds up investigation of elevated results.

6.4 Special Fixture Types

Some fixtures require additional steps:

- **Ice Makers:** Fill a 250 mL container at least three-quarters full of ice. Use a non-metal scoop or disposable gloves. Do not touch the ice with bare hands.
- **Inline Coffee Makers:** If the unit has a hot water spigot, collect from the hot water side. Label clearly as an inline coffee maker sample.
- **Kitchen Kettles:** Test only if the kettle is used for drinking water consumption and has a spigot suitable for sampling. If used only for warming food and not labeled as a drinking source, it does not need to be tested.

6.5 Sample Handling and Shipping

- Keep all samples at room temperature or refrigerated (not frozen).
- Deliver or ship samples to the laboratory within the time frame specified by your lab – typically within 14 days of collection.
- Complete the chain-of-custody form in full. Sign and date it. Keep a copy for your records.
- If using a field analyzer, follow manufacturer instructions for on-site analysis and documentation.

120 Water
250 South Elm Street
Zionsville, IN 46077

1-800-674-7961

Section 7: Laboratory Testing Requirements

7.1 Selecting an Accredited Laboratory

This school uses a Minnesota-accredited laboratory for lead analysis. Accredited labs use EPA-approved methods, employ certified analysts, and provide chain-of-custody documentation to verify sample integrity. To find an accredited Minnesota laboratory, visit the MDH Lab Accreditation search at www.health.state.mn.us/labsearch and enter:

- Program: Safe Drinking Water Program
- Analyte: Lead
- Matrix: Drinking Water

120 Water
250 South Elm Street
Zionsville, IN 46077

1-800-674-7961

7.2 Chain-of-Custody Requirements

Every sample must be accompanied by a completed chain-of-custody (COC) form. The COC documents the integrity of the sample from collection through analysis. At minimum, the COC must include:

- School name and site address
- Fixture ID and description
- Date and time of sample collection
- Name of sampler
- Stagnation time (hours water was undisturbed before collection)
- Sample type (first-draw or flush)
- Number of samples submitted

7.3 Detection and Reporting Standards

Results must be expressed in parts per billion (ppb), also written as micrograms per liter (ug/L). The laboratory or field analyzer must have a detection limit of 2 ppb or lower. If a result is below the detection limit, it will be reported as "non-detect" or "<[detection limit]." Non-detect results still require documentation.

All results — including non-detects — must be entered into the school's fixture inventory and testing log and reported to MDH annually.

7.4 MDH WIIN Grant Program

The Minnesota Department of Health administers a Water Infrastructure Improvements for the Nation (WIIN) Grant program that can provide free or subsidized sample kits and laboratory analysis for eligible schools. Contact MDH at 651-201-4700 or visit www.health.state.mn.us/communities/environment/water/schools/mngrant.html to learn more. If your school is participating in this program, note it here:

"Swan River Montessori Charter School is enrolled in the Minnesota Department of Health (MDH) WIIN Grant Program for 2026. MDH provided the sample kits and coordinated laboratory analysis through 120Water

Section 8: Interpreting Results

8.1 Understanding Lead Levels

Once you receive results, verify that all values are expressed in parts per billion (ppb). Use the action threshold table below to determine what steps are required. Remember: a result of 4 ppb is not meaningfully safer than 5 ppb. The 5 ppb threshold is a legal trigger point, not a safe level. This school strives to minimize lead at all levels.

Lead Level	What It Means	Required / Recommended Actions	Communication & Reporting
Non-Detect to < 1 ppb	No lead detected or below 1 ppb	No immediate action required. Continue routine maintenance. Retest within 5 years.	Optional: Share results with families as a best practice.
1 ppb to < 5 ppb	Lead detected at low levels	No mandatory remediation but MDH recommends examining fixtures and maintenance practices. Consider aerator cleaning and flushing. Share results with families.	Voluntary remediation encouraged. Document all steps.
5 ppb or higher	MANDATORY ACTION LEVEL (MN Statute 121A.335)	IMMEDIATELY discontinue use of fixture for drinking and food prep. Remediate (replace fixture, implement flushing, install certified filter). Retest to confirm result below 5 ppb. Notify parents within 30 days if not fully remediated.	Report to MDH by July 1 each year. Post results on school website.

8.2 Reference Points

The following values help put lead results in context:

- 0 ppb: EPA maximum contaminant level goal (MCLG). No amount of lead in water is considered safe.
- 1 ppb: American Academy of Pediatrics recommended standard for school drinking water taps.
- 5 ppb: Minnesota mandatory remediation threshold (Minn. Stat. 121A.335). Fixtures must be taken out of service immediately.
- 2 ppb: Maximum detection limit MDH recommends for laboratory analysis. Results below this may appear as non-detect.

8.3 Variability in Results

Lead levels can vary significantly between testing events at the same fixture, depending on stagnation time, temperature, recent use, and the type of plumbing materials. A single result, whether high or low, does not tell the whole story. If results seem inconsistent or unexpected, consult MDH or consider additional investigative sampling using the EPA 3Ts Module 5 guidance.

Section 9: Required Actions for Elevated Lead Levels

9.1 Immediate Steps When Lead Is at or Above 5 ppb

When any fixture tests at or above 5 ppb, the following actions must be taken immediately:

1. **TAKE THE FIXTURE OUT OF SERVICE.** Post a clear "Do Not Use" or "Not for Drinking" sign at the fixture. If possible, shut off the fixture or make it physically inaccessible. Do not wait for a retest before taking this step.
2. Notify the Lead Testing Coordinator and school administration.
3. Document the result in the fixture inventory and testing log.
4. Begin planning remediation — see Section 9.2 for options.
5. If remediation is not completed within 30 days, notify parents of the result — see Section 10.

9.2 Remediation Options

The following options are listed in order of long-term effectiveness. Permanent removal of the lead source is always preferable to ongoing mitigation. A combination of strategies may be used. All remediation steps must be documented.

Option 1: Removal or Replacement (Highest Priority)

Replacing a lead-containing fixture or plumbing component with a certified lead-free alternative is the most effective and permanent solution.

- Remove the fixture from service permanently if it is not essential.
- Replace with a lead-free fixture or plumbing component that meets NSF/ANSI Standard 61.
- Replace lead pipes, lead solder, or brass fittings with certified lead-free materials.
- Verify lead-free certification using EPA guidance on certification marks for drinking water products.

Option 2: Flushing Program

A flushing program reduces lead levels by clearing stagnant water from plumbing before use. Flushing must be performed consistently to be effective. If flushing is stopped, lead levels may return.

Individual Tap Flushing: Run the identified fixture for the site-specific time needed each morning before children arrive, and again at midday. After weekends or breaks, run the fixture for 10 to 15 minutes before allowing use.

Main Pipe Flushing: When lead is found throughout a building or zone, flush fixtures starting with the one farthest from the water entry point, working inward. Each fixture should run for at least 10 minutes in sequence.

Flushing effectiveness must be verified by follow-up testing. If flushing is discontinued, retest within 3 months to assess the impact on lead levels.

Option 3: Cleaning Aerators

Debris and lead particles can accumulate in faucet aerator screens. Cleaning aerators at least once every 6 months — or quarterly — is recommended as routine maintenance. Cleaning alone is not a permanent solution; lead may re-accumulate. Verify effectiveness by retesting after cleaning.

Option 4: Point-of-Use (POU) Filtration

A certified point-of-use water filter installed at a fixture can effectively reduce lead in drinking water if properly maintained. Filters must be:

- Certified to NSF Standard 53 or NSF Standard 58, or equivalent, with a lead reduction claim.
- Installed, operated, and maintained per the manufacturer's instructions.
- Replaced on schedule — expired or improperly maintained filters may not remove lead.
- Reviewed for compliance with Department of Labor and Industry requirements before installation. Contact DLI at (651) 284-5063.

Hydration stations (filtered bottle-fill stations) certified for lead reduction are an excellent alternative to older drinking fountains and may qualify for MDH Hydration Station Grants.

Option 5: Point-of-Entry Chemical Treatment

Chemical treatment adjusts water chemistry to reduce corrosion and lead uptake. This requires MDH plan review and approval before installation and may reclassify the school as a public water system under the Safe Drinking Water Act. Contact MDH at 651-201-4700 before pursuing this option.

9.3 Retesting After Remediation

After any remediation action, the affected fixture must be retested using the same first-draw procedure described in Section 6. The fixture may not return to service for drinking or food preparation until a retest confirms the lead level is below 5 ppb. Document the retest result in the fixture inventory.

If the retest result is still at or above 5 ppb, continue remediation efforts. If results remain persistently elevated, contact MDH at 651-201-4700 for consultation.

At this time, no remediation actions have been initiated. The school is awaiting test results from 120Water before determining whether any remediation measures are necessary.

Section 10: Communication Plan

10.1 Overview

Open, proactive communication about lead testing builds community trust and meets legal requirements. Minnesota Statute 121A.335 establishes specific communication requirements for charter schools. This section describes how this school will meet and exceed those requirements.

10.2 Designated Communication Contact

All questions about lead testing results and remediation should be directed to:

Kirsten Host – Operations Manager
500 Maple Street, Monticello MN 55362

KirstenH@SwanRiverMontessori.Org / 7663-271-7926

10.3 Annual Parent and Staff Notice

Each year, this school must send parents an annual notice that includes:

- The school's testing and remediation plan (or a summary and link to where the full plan can be found)
- How to find current test results
- A description of any remediation efforts completed or underway
- Reference to the school website where this information is posted

This notice must also appear in the school's official handbook or policy guide. The school website must be updated at least annually.

Annual notices regarding the school's Lead in Drinking Water program will be distributed to all currently enrolled families via email no later than May 1 of each year. The notice will also be posted on the school's website to ensure public accessibility and ongoing availability of program information

10.4 Communication When Lead Is Found at or Above 5 ppb

If any fixture tests at or above 5 ppb, the school must:

1. Within 30 days of receiving the result: either (a) complete remediation and confirm by retest that the level is below 5 ppb, or (b) directly notify parents of the result.
2. Post the result on the school website, along with a description of the remediation steps being taken.
3. Notify all staff who work in or near the affected area.
4. Continue to provide alternative water sources (bottled water or access to a different verified-safe fixture) until remediation is complete.

If elevated lead levels are detected, the affected fixture will be immediately marked out of order and removed from service pending remediation. During this time, alternative drinking water fixtures within the school that have not shown elevated lead levels will be used. If elevated lead levels are identified in multiple fixtures and sufficient safe drinking water sources are not available, the school will secure portable water coolers or bottled water through the school's food service provider or local vendors, depending on availability, until remediation has been completed.

10.5 Website Posting Requirements

Test results, the testing and remediation plan, and remediation descriptions must be publicly available on the school website and updated at least annually. The web address where this information is posted is:

<https://swanrivermontessori.org/about-us/school-policies/>

10.6 Communication with the Public Water System

If this school is served by a municipal water system, the Lead Testing Coordinator should maintain a working relationship with that system. The school should:

- Contact the water system if there are sudden changes in taste, odor, or color of the water.
- Confirm whether the school has a lead service line by contacting the water system.
- Review the water system's annual Consumer Confidence Report (CCR). MN CCRs are available at mnccr.web.health.state.mn.us.
- Coordinate communications with the water system if lead is detected, so messages to families are consistent and accurate.

Monticello Public Works
909 Golf Course Road
Monticello MN 55632

Mat Stang - Utilities Superintendent
763-271-3274
Mat.Stang@MonticelloMN.gov

Section 11: Recordkeeping and Reporting

11.1 Records That Must Be Kept

Minnesota Statute 121A.335 requires charter schools to maintain records of all lead testing results and remediation activities for at least 15 years. Records must be made available to MDH and to the public upon request. The following records must be retained:

- This written Plan and any revisions
- Complete fixture inventory (Section 5)
- All sample chain-of-custody forms
- All laboratory result reports
- Testing log (see template below)
- Documentation of all remediation actions, including dates, methods, and retests
- Annual parent communication notices
- MDH annual report submissions
- Calibration and maintenance records for any field analyzers
- Training records for sampling staff

All records are maintained in the Lead Testing binder located in the main office and are also backed up digitally on the school's shared drive. The School Director and Operations Manager are responsible for maintaining and updating these records

11.2 Annual Reporting to MDH

Beginning July 1, 2024, all charter schools must report lead test results and remediation activities to MDH annually by July 1. Reports are submitted using MDH's online portal or the Lead Results and Remediation Reporting Spreadsheet available at www.health.state.mn.us. Results reported to MDH will be posted on the MDH website by school site.

To complete your annual report, you will need:

- Fixture IDs and locations for all fixtures tested in the reporting period
- Sample dates and results (in ppb) for each fixture
- Description of any remediation actions taken and retest results
- Contact information for the school's Lead Testing Coordinator

Swan River Montessori Charter School will report annual lead testing results and any remediation activities to the Minnesota Department of Health (MDH) no later than June 30 of each fiscal year. Reports will be submitted using MDH's online reporting portal in accordance with state requirements.

11.3 Testing Log Template

Use the table below to track each testing event. This log should be updated within one week of receiving results. Keep a complete log for each building.

See attached document - Water Testing FY26

Section 12: Ongoing Monitoring and Water Management Plan

12.1 Five-Year Retesting Requirement

Every fixture used for drinking water or food preparation must be tested at least once every five years, regardless of past results. Fixtures where lead was previously detected at any level should be retested first in the next cycle. This school's retesting schedule follows the same priority framework as the initial testing schedule in Section 4.

12.2 Routine Maintenance to Reduce Lead

Good daily and seasonal practices can significantly reduce lead levels in drinking water. The following maintenance tasks are part of this school's routine water management:

Aerator Cleaning: Clean faucet aerators at least once every 6 months (quarterly is recommended). Lead particles and debris collect in aerator screens and can be released into drinking water. If visible buildup is observed, clean immediately.

Flushing After Extended Closures: After weekends, school breaks, and summer closure, flush all drinking water fixtures before students return. Run each fixture for at least 10 to 15 minutes, starting with the fixture farthest from the water source and working inward.

Daily Flushing if Implemented: If this school has implemented a flushing program as a remediation strategy, the program must be followed consistently every school day. Document flushing frequency, duration, and any deviations.

Hot Water Systems: Verify hot water fixtures deliver hot water. If hot water fixtures deliver lukewarm or cold water, check and repair mixing valves. Warm, stagnant water is also a risk factor for bacterial growth.

Use Only Lead-Free Materials: When performing any plumbing work or installation, verify that all new pipes, fittings, solder, and fixtures are certified lead-free and meet NSF/ANSI Standard 61.

Label Non-Drinking Fixtures: Post clear "Not for Drinking" signs on all non-tested fixtures (bathroom sinks, hose bibs, custodial sinks). Use pictures as well as words in areas accessible to young children.

12.3 Water Management Plan Components

Per Minnesota Statute 121A.335(b), this school has developed a Water Management Plan documenting routine water quality strategies. The plan is based on the EPA guidance Ensuring Drinking Water Quality in Schools During and After Extended Closures and the EPA 3Ts Toolkit. The plan addresses the following:

1. Fixture identification and use classification (see Section 5 Inventory)
2. Areas of concern where lead or biological activity is most likely based on building age, water use patterns, and plumbing materials
3. Routine maintenance schedules, including aerator cleaning, flushing, and hot water system checks
4. Procedures for extended closures (summer, winter break, etc.)
5. Monitoring methods to assess whether controls are working (e.g., lead tests, chlorine tests, temperature checks)
6. Intervention procedures when a control is not meeting expectations
7. Documentation and communication of results

Swan River Montessori Charter School maintains routine water fixture management practices to support safe drinking water quality throughout the building. Drinking water fixtures, including classroom sinks, staff sinks, bottle filling stations, kitchen fixtures, and drinking fountains, are identified in the school's fixture inventory and included in routine flushing and maintenance procedures.

During normal school operations, fixtures are regularly used throughout the day by students and staff. After extended periods of low or no water use, including summer break, winter break, spring break, or closures longer than five days, all drinking water fixtures will be flushed before students and staff return to the building. Flushing procedures typically include running cold water at each fixture for several minutes to bring in fresh water from the main supply.

The Operations Manager and designated facilities staff are responsible for coordinating flushing procedures, routine inspections, and maintenance activities. Aerators will be cleaned periodically and checked for buildup or debris. Fixtures found to have damage, corrosion, discoloration, or other concerns will be evaluated and removed from service if necessary.

If elevated lead levels or other water quality concerns are identified, the affected fixture will be immediately removed from service and remediation steps will be implemented in accordance with MDH guidance. Alternative drinking water sources will be provided as needed until remediation is completed.

Lead testing results, flushing activities, maintenance records, remediation actions, and communications related to drinking water quality are documented and maintained in the school's Lead Testing binder, digitally shared folder and website. Annual testing results and required reporting will be submitted to the Minnesota Department of Health (MDH) through the MDH reporting portal.

12.4 Monitoring of Remediation Measures

If this school has active remediation measures in place (such as a flushing program or point-of-use filters) those measures must be monitored to confirm they remain effective:

- Flushing programs: Periodically collect and test first-draw samples from flushed fixtures to confirm that lead levels remain below 5 ppb throughout the day.
- Point-of-use filters: Replace filter cartridges on the manufacturer's recommended schedule. Keep a log of replacement dates. Test filtered water at least annually or as often as the manufacturer recommends.
- If any monitoring result shows lead at or above 5 ppb in a fixture subject to an active remediation measure, treat it as a new elevated result and follow the steps in Section 9.

12.5 Plan Review and Updates

This Plan must be reviewed and, if necessary, revised:

- At least every five years, to coincide with the start of a new testing cycle
- Within 90 days of any significant plumbing renovation, addition, or change in building use
- When regulatory requirements change
- When a new building or site is added to the school

This Plan was reviewed on May 18, 2026, by Kirsten Host and Annette Vemuri. The next scheduled review will occur on or before May 18, 2031, in alignment with the school's five-year testing cycle. The Plan may also be reviewed and updated intermittently as needed in response to regulatory changes, plumbing modifications, building use changes, or findings from current or future testing results

Section 13: Resources and Contacts

13.1 State Agency Contacts

Minnesota Department of Health (MDH) – Drinking Water Protection: 651-201-4700 | HEALTH.WIIN_Grant@state.mn.us | www.health.state.mn.us

MDH Lead Testing Information: www.health.state.mn.us/communities/environment/water/schools

MDH Lab Accreditation Search: www.health.state.mn.us/labsearch

MDH Consumer Confidence Reports: mnccr.web.health.state.mn.us

Minnesota Department of Education (MDE) – Facilities Finance: 651-582-8779 | mde.funding@state.mn.us | Long-Term Facilities Maintenance program may fund testing and remediation costs.

Minnesota Department of Labor and Industry (DLI) – Plumbing Permits: (651) 284-5063 (required for point-of-use device installation)

13.2 Grant and Funding Opportunities

- MDH WIIN Grant – Free sample kits and lab analysis for eligible schools. Contact MDH at 651-201-4700.
- MDH Lead Remediation in Drinking Water Grant – Funds remediation at facilities with confirmed elevated lead levels. Visit www.health.state.mn.us/communities/environment/water/com/leadremgrant.html.
- MDH Hydration Station Grants – Funds certified filtered water stations. Visit www.health.state.mn.us/communities/environment/water/com/grants.html.

- MDE Long-Term Facilities Maintenance Revenue — May fund testing and remediation; does not cover daily flushing staff time. Visit education.mn.gov.

13.3 Key Reference Documents

- MDH Technical Guidance: Reducing Lead in Drinking Water in Minnesota Schools and Child Care Facilities (February 2025)
- EPA 3Ts for Reducing Lead in Drinking Water Toolkit (2018): www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water-toolkit
- EPA Ensuring Drinking Water Quality in Schools During and After Extended Closures
- NSF Certified Drinking Water Treatment Units: info.nsf.org/Certified/dwtu
- Minnesota Statutes, Section 121A.335: www.revisor.mn.gov/statutes/cite/121A.335
- Lead Results and Remediation Reporting Spreadsheet:
www.health.state.mn.us/communities/environment/water/docs/leadreporttemplate.xlsx

Section 14: Plan Adoption and Approval

This Lead in Drinking Water Testing and Remediation Plan has been reviewed and adopted by the governing board of:

Swan River Montessori Charter School

This Plan is adopted in accordance with Minnesota Statutes, Section 121A.335, and is based on the Minnesota Department of Health and Minnesota Department of Education Technical Guidance (February 2025). The school commits to implementing this Plan, testing all drinking water fixtures on the established schedule, responding to elevated lead levels as required, communicating results to families and staff, and reporting annually to the Minnesota Department of Health.

Board Chair Signature: _____ Date: _____

Printed Name: _____ Title: Board Chair

School Administrator Signature: _____ Date: _____

Printed Name: _____ Title: _____

Lead Testing Coordinator Signature: _____ Date: _____

Printed Name: _____ Title: _____

Revision History

Revision Date	Revised By	Summary of Changes	Approved By
05/18/2026	Kirsten Host	Updated and Attached documents	[Name/Title]
[Date]	[Name]	[Description of changes]	[Name/Title]
[Date]	[Name]	[Description of changes]	[Name/Title]

Glossary of Key Terms

Aerator: A screen at the tip of a faucet that mixes water and air to reduce splashing. Lead and debris can collect in aerators.

Chain-of-Custody (COC): A form documenting the collection, handling, and transfer of water samples to ensure the integrity of the analysis.

Detection Limit: The lowest concentration of lead that a laboratory or field analyzer can reliably detect. MDH recommends a maximum detection limit of 2 ppb for lead in school water testing.

First-Draw Sample: A water sample collected from a fixture that has not been used or flushed for at least 8 hours (but no more than 18 hours). First-draw samples capture the water with the highest potential lead concentration.

Fixture: Any point of access for drinking water or food preparation water, including faucets, drinking fountains, water coolers, and kitchen sinks.

Flush Sample: A water sample collected after running the fixture for a set period (usually 30 seconds) to determine where in the plumbing system lead is originating.

Lead-Free: Under the Reduction of Lead in Drinking Water Act, a product is lead-free if the weighted average lead content of wetted surfaces is no more than 0.25% for pipes and fittings, and 0.2% for solder and flux.

Non-Detect: A result below the laboratory's detection limit. Often expressed as 'ND' or '<2 ppb.' Even a non-detect result should be documented.

Parts per Billion (ppb): The unit used to measure lead concentration in water. One ppb equals one microgram of lead per liter of water (ug/L).

Point-of-Entry (POE) Treatment: A water treatment system installed where water enters the building, treating all water used in the facility.

Point-of-Use (POU) Treatment: A water treatment device installed at a single fixture, such as a certified faucet filter or reverse osmosis unit.

Public Water System (PWS): A water supply system serving at least 25 people or 15 service connections for at least 60 days per year. Schools served by municipal water are connected to a PWS.

Remediation: Actions taken to reduce or eliminate lead in drinking water, such as fixture replacement, flushing, aerator cleaning, or filter installation.

Stagnation: The period during which water sits undisturbed in pipes and fixtures, during which it absorbs lead from plumbing materials.