

November 2, 2023



AJ Krogh  
Medford Public Schools  
750 2<sup>nd</sup> Ave SE  
Medford, MN 55049

**RE: Medford Public Schools  
Lead-in-Water First Draw – Initial Testing  
IEA Project #202310867**

Dear Mr. Krogh:

At the request of Medford Public School District, IEA collected 28 water samples from identified potable water sources on October 18, 2023, for lead analyses from the following buildings:

- Medford Public Schools (28 samples)

The purpose of the sampling is to document lead content in the sampled locations.

## INTRODUCTION

Minnesota Statute 121A.335 requires public school buildings serving pre-kindergarten through grade 12 to test for lead in potable water fixtures every five years. The *3Ts for Reducing Lead in Drinking Water Toolkit (2018)* and the Lead Contamination Control Act (LCCA) of 1988 were created by the Environmental Protection Agency (EPA) to identify and reduce lead in drinking water. Lead is a metal that usually enters drinking water through the distribution system, including pipes, solders, faucets, and valves. Lead content in water may increase when the water is allowed to sit undisturbed in the system. Exposure to lead is a health concern.

The EPA recommends taking action when elevated lead levels are noted in water fixtures. The MDH and MDE recommend taking a fixture out of service if levels are 20 parts per billion (ppb) or higher. The MDH and MDE also recommend taking action according to their guidelines for fixtures with levels of 2 parts per billion (ppb) or higher.

INSTITUTE FOR ENVIRONMENTAL ASSESSMENT, INC.  
[www.ieasafety.com](http://www.ieasafety.com)

BROOKLYN PARK  
9201 West Broadway, #600  
Brooklyn Park, MN 55445  
763-315-7900 / FAX 763-315-7920  
800-233-9513

MANKATO  
610 North Riverfront Drive  
Mankato, MN 56001  
507-345-8818 / FAX 507-345-5301  
800-233-9513

ROCHESTER  
210 Woodlake Drive SE  
Rochester, MN 55904  
507-281-6664 / FAX 507-281-6695  
800-233-9513

BRAINERD  
601 NW 5<sup>th</sup> Street, Ste. #4  
Brainerd, MN 56401  
218-454-0703 / FAX 218-454-0703  
800-233-9513

MARSHALL  
1420 East College Drive  
Marshall, MN 56258  
507-476-3599 / FAX 507-537-6985  
800-233-9513

VIRGINIA  
5525 Emerald Avenue  
Mountain Iron, MN 55768  
218-410-9521  
800-233-9513

## **METHODOLOGY**

IEA collected 28 first draw (unless otherwise noted) samples of approximately 250 milliliters (ml) of water. “First draw” means the samples are collected before the fixture is used or flushed during the day. The first-draw sample results reflect a worst-case scenario, i.e., the highest lead level that would be consumed by building occupants. MDH recommends fixtures not be used 6 to 18 hours prior to sampling fixtures.

Water samples were analyzed by RMB Environmental Laboratories, Inc. in Hibbing, Minnesota, which uses EPA-approved analytical methods and quality control/assurance procedures. Samples were analyzed using the RMBEL Method: EPA Method 2009.

## **RESULTS & DISCUSSION**

The lead-in-water sampling results were all <2.0 ppb. Thus, the lead content was below the MDH action level of 2 ppb. The laboratory reports are provided in Appendix A. Laboratory results are reported in micrograms per liter (µg/L) which is equivalent to parts per billion (ppb).

## **RECOMMENDATIONS**

Sampled fixtures showed lead levels below the MDH action level of 2ppb. Based on the sample results, no further action is required at this time.

It is recommended that a copy of the district's Lead in Water Testing Report be made available to staff and the public through the district's administrative offices. Per Minnesota Statutes, section 121A.335, a school district that has tested its buildings for the presence of lead shall make the results of the testing available to the public for review and must notify parents of the availability of the information.

## **GENERAL CONDITIONS**

The analysis and opinions expressed in this report are based upon data obtained from Medford Public School District at the indicated locations. This report does not reflect variations in conditions that may occur across the site, property, or facility. Actual conditions may vary and may not become evident without further assessment.

The report is prepared for the exclusive use of our client for specific application to the project discussed and has been prepared in accordance with generally accepted environmental, health and safety practices. Other than as provided in the preceding sentence and in our Proposal #11538 dated August 17<sup>th</sup>, 2023, regarding lead-in-water sampling at Medford Public Schools, including the General Conditions attached thereto, no warranties are extended or made.

Please contact IEA if you would like assistance with any of the above recommendations or have questions regarding this report.

Sincerely,

IEA, Inc.

A handwritten signature in black ink, appearing to read 'Tom Talcott', with a horizontal line drawn through the middle of the signature.

Tom Talcott  
EH&S Project Manager

Enc.

# **Appendix A**

*Laboratory Testing Report*

October 25, 2023  
Laboratory Report

IEA - Rochester  
Angie Radel  
210 Woodlake Drive SE  
Rochester, MN 55904

RE: Medford Public Schools  
Work Order :B011034

Enclosed are the results of analyses for samples received by the laboratory on 10/19/2023 10:45. If you have any questions concerning this report, please feel free to reach out to customer service at 888-200-5770 or the contacts listed below:

Chad Hadler	Sr. Project Manager	Chad.Hadler@rmbel.com	(952) 456-8470
Justin Tweedale	Sr. Project Manager	Justin.Tweedale@rmbel.com	(218) 849-8747
Kathleen Mitchell	Quality Assurance Director	Kathleen.Mitchell@rmbel.info	(785) 493-1633
Robert Borash	President   CEO	Robert.Borash@rmbel.info	(218) 849-6420

Report approved by:



Chad Hadler  
Project Manager  
chad.hadler@rmbel.com

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*The results in this report apply only to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.*

Detroit Lakes (DL) Certification / Accreditation Numbers: EPA Lab ID MN00918 • Minnesota Department of Health 027-005-336 • North Dakota Department of Environmental Quality R-187  
Bloomington (BL) Certification / Accreditation Numbers: EPA Lab ID MN01091 • Minnesota Department of Health 027-053-475 • North Dakota Department of Environmental Quality R-231  
Hibbing (HB) Certification / Accreditation Numbers: EPA Lab ID MN01082 • Minnesota Department of Health 027-137-480 • North Dakota Department of Environmental Quality R-228

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**Report Date: October 25,2023**

**IEA - Rochester**  
**210 Woodlake Drive SE**  
**Rochester MN, 55904**

**Project:** Medford Public Schools  
**Project Number:** 202310867

**Date/Time Received**  
10/19/2023 10:45:00AM

**ANALYTICAL REPORT FOR SAMPLES**

Laboratory ID	Sample ID	Location	Matrix	Date/Time Sampled
B011034-01	101823MPS-01	Kitchen Middle Bay NW S	Water	10/18/2023 06:00
B011034-02	101823MPS-02	Kitchen Middle Bay SE S	Water	10/18/2023 06:00
B011034-03	101823MPS-03	Kitchen NW wall S	Water	10/18/2023 06:00
B011034-04	101823MPS-04	Kitchen NW wall Sprayer	Water	10/18/2023 06:00
B011034-05	101823MPS-05	Hallway outside of 151 BF	Water	10/18/2023 06:00
B011034-06	101823MPS-06	Hallway outside of 151 Rt WC	Water	10/18/2023 06:00
B011034-07	101823MPS-07	Hallway outside of 151 Lt WC	Water	10/18/2023 06:00
B011034-08	101823MPS-08	Room 152 S	Water	10/18/2023 06:00
B011034-09	101823MPS-09	Room 702 S	Water	10/18/2023 06:00
B011034-10	101823MPS-10	Hallway outside 825 Rt WC	Water	10/18/2023 06:00
B011034-11	101823MPS-11	Hallway outside 825 Lt WC	Water	10/18/2023 06:00
B011034-12	101823MPS-12	Room 826 S	Water	10/18/2023 06:00
B011034-13	101823MPS-13	Hallway outside 731 WC	Water	10/18/2023 06:00
B011034-14	101823MPS-14	Hallway outside 731 BF	Water	10/18/2023 06:00
B011034-15	101823MPS-15	Hallway outside 741 WC	Water	10/18/2023 06:00
B011034-16	101823MPS-16	Hallway outside 741 BF	Water	10/18/2023 06:00
B011034-17	101823MPS-17	Hallway outside 307 Lt WC	Water	10/18/2023 06:00
B011034-18	101823MPS-18	Hallway outside 307 RT WC	Water	10/18/2023 06:00
B011034-19	101823MPS-19	Hallway outside 307 RT BF	Water	10/18/2023 06:00
B011034-20	101823MPS-20	Room 412 S	Water	10/18/2023 06:00
B011034-21	101823MPS-21	Room 403 S	Water	10/18/2023 06:00
B011034-22	101823MPS-22	Hallway outside 506 RT WC	Water	10/18/2023 06:00
B011034-23	101823MPS-23	Hallway outside 506 Lt WC	Water	10/18/2023 06:00
B011034-24	101823MPS-24	Hallway outside 506 Rt BF	Water	10/18/2023 06:00
B011034-25	101823MPS-25	Room 407 S	Water	10/18/2023 06:00
B011034-26	101823MPS-26	Room 409 S	Water	10/18/2023 06:00
B011034-27	101823MPS-27	Room 411 S	Water	10/18/2023 06:00
B011034-28	101823MPS-28	Room 413 S	Water	10/18/2023 06:00

**Additional information:**

All samples will be retained for 30 days from date sampled, unless otherwise requested.  
Record retention policy is 5 years unless otherwise agreed to in writing.  
All calculations are performed using the raw data results.

**Laboratory Results**  
**October 25, 2023**

Lab Number	Analyte	Sample ID	Location	Result	Units	Sample RL	DF	Analysis Method	Analyzed	Batch	Analyte Qualifiers	Facility
B011034-01	Lead	101823MPS-01	Kitchen Middle Bay NW S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 11:46	BG08618		DL
B011034-02	Lead	101823MPS-02	Kitchen Middle Bay SE S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 11:48	BG08618		DL
B011034-03	Lead	101823MPS-03	Kitchen NW wall S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 11:50	BG08618		DL
B011034-04	Lead	101823MPS-04	Kitchen NW wall Sprayer	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 11:52	BG08618		DL
B011034-05	Lead	101823MPS-05	Hallway outside of 151 BF	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 11:55	BG08618		DL
B011034-06	Lead	101823MPS-06	Hallway outside of 151 Rt WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:01	BG08618		DL
B011034-07	Lead	101823MPS-07	Hallway outside of 151 Lt WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:04	BG08618		DL
B011034-08	Lead	101823MPS-08	Room 152 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:06	BG08618		DL
B011034-09	Lead	101823MPS-09	Room 702 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:10	BG08618		DL
B011034-10	Lead	101823MPS-10	Hallway outside 825 Rt WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:12	BG08618		DL
B011034-11	Lead	101823MPS-11	Hallway outside 825 Lt WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:15	BG08618		DL
B011034-12	Lead	101823MPS-12	Room 826 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:17	BG08618		DL
B011034-13	Lead	101823MPS-13	Hallway outside 731 WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:19	BG08618		DL
B011034-14	Lead	101823MPS-14	Hallway outside 731 BF	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:21	BG08618		DL
B011034-15	Lead	101823MPS-15	Hallway outside 741 WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:28	BG08618		DL
B011034-16	Lead	101823MPS-16	Hallway outside 741 BF	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:30	BG08618		DL
B011034-17	Lead	101823MPS-17	Hallway outside 307 Lt WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:33	BG08618		DL
B011034-18	Lead	101823MPS-18	Hallway outside 307 RT WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:35	BG08618		DL
B011034-19	Lead	101823MPS-19	Hallway outside 307 RT BF	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:42	BG08618		DL
B011034-20	Lead	101823MPS-20	Room 412 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:44	BG08618		DL
B011034-21	Lead	101823MPS-21	Room 403 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:46	BG08618		DL
B011034-22	Lead	101823MPS-22	Hallway outside 506 RT WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:48	BG08618		DL
B011034-23	Lead	101823MPS-23	Hallway outside 506 Lt WC	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:55	BG08618		DL

Lab Number	Analyte	Sample ID	Location	Result	Units	Sample RL	DF	Analysis Method	Analyzed	Batch	Analyte Qualifiers	Facility
<b>Metals</b>												
B011034-24	Lead	101823MPS-24	Hallway outside 506 Rt BF	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 12:57	BG08618		DL
B011034-25	Lead	101823MPS-25	Room 407 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 13:00	BG08618		DL
B011034-26	Lead	101823MPS-26	Room 409 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 13:02	BG08618		DL
B011034-27	Lead	101823MPS-27	Room 411 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 13:04	BG08618		DL
B011034-28	Lead	101823MPS-28	Room 413 S	< 2.00	ug/L	2.00	1	EPA 200.8	10/23/23 13:06	BG08618		DL



**Metals - Quality Control**

Analyte	Result	Units	Qualifiers	Sample RL	DF	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
<b>Batch BG08618 - EPA 200.8</b>											
<b>Blank (BG08618-BLK1)</b>											
Prepared & Analyzed: 10/23/2023											
<b>Lead</b>	< 2.00	ug/L		2.00	1						
<b>Blank (BG08618-BLK2)</b>											
Prepared & Analyzed: 10/23/2023											
<b>Lead</b>	< 2.00	ug/L		2.00	1						
<b>Blank (BG08618-BLK3)</b>											
Prepared & Analyzed: 10/23/2023											
<b>Lead</b>	< 2.00	ug/L		2.00	1						
<b>LCS (BG08618-BS1)</b>											
Prepared & Analyzed: 10/23/2023											
<b>Lead</b>	50.3	ug/L		2.00	1	50.0		101	85-115		
<b>LCS (BG08618-BS2)</b>											
Prepared & Analyzed: 10/23/2023											
<b>Lead</b>	50.4	ug/L		2.00	1	50.0		101	85-115		
<b>LCS (BG08618-BS3)</b>											
Prepared & Analyzed: 10/23/2023											
<b>Lead</b>	48.9	ug/L		2.00	1	50.0		98	85-115		
<b>Matrix Spike (BG08618-MS2)</b>											
Prepared & Analyzed: 10/23/2023											
Source: B011034-08											
<b>Lead</b>	53.9	ug/L		2.00	1	50.0	0.74	106	70-130		
<b>Matrix Spike (BG08618-MS3)</b>											
Prepared & Analyzed: 10/23/2023											
Source: B011034-18											
<b>Lead</b>	51.8	ug/L		2.00	1	50.0	0.21	103	70-130		
<b>Matrix Spike (BG08618-MS4)</b>											
Prepared & Analyzed: 10/23/2023											
Source: B011034-28											
<b>Lead</b>	52.5	ug/L		2.00	1	50.0	0.24	104	70-130		
<b>Matrix Spike Dup (BG08618-MSD3)</b>											
Prepared & Analyzed: 10/23/2023											
Source: B011034-18											
<b>Lead</b>	52.2	ug/L		2.00	1	50.0	0.21	104	70-130	0.6	20

**Qualifiers and Definitions**

<b>Item</b>	<b>Definition</b>
RL	Reporting Limit (Corrected for dilution factor when applicable due to sample preparation variation.)
MDL	Method Detection Limit (Corrected for sample preparation variation.)
DF	Dilution Factor
DL	Indicates test performed by RMB Environmental Laboratories - Detroit Lakes



B011034

Ref 2



9201 West Broadway North, Suite 600  
Brooklyn Park, MN 55445  
763.315.7900  
1.800.233.9513

### Chain of Custody

Client Name		Medford Public Schools		Building Name		Medford Public Schools		Analytical Lab		RMB					
Contact Name		Emma Squires-Sperling		Angie Radel		Project #		202310867		Project Name		2023 Lead in Water Testing			
Phone #		763-315-7900		IEA Fax #		763-315-7927		Written Sample Results To		lab@nasafey.com					
Other Information															
Sampled By		Tom Talcott		Date		###/##/##		Time		6:00 AM		Date & Time			
Reviewed By				Date				Time							
Shipped By		RMB Pickup		Date				Time				Notes			
Received By				Date				Time				Temperature			
Lab Number		Sample Number		Sample Location		Sample Type		Date Sampled		Volume/ Bottle Type		Analysis Required		Comments & Observations	
18		101823MPS-28		Room 413 S		Water		10/18/2023		250mL unpreserved		Lead			
		101823MPS-29				Soil		10/18/2023		250mL unpreserved		Lead			
		101823MPS-30				Other		10/18/2023		250mL unpreserved		Lead			
		101823MPS-31				Water		10/18/2023		250mL unpreserved		Lead			
		101823MPS-32				Soil		10/18/2023		250mL unpreserved		Lead			
		101823MPS-33				Other		10/18/2023		250mL unpreserved		Lead			
		101823MPS-34				Water		10/18/2023		250mL unpreserved		Lead			
		101823MPS-35				Soil		10/18/2023		250mL unpreserved		Lead			
		101823MPS-36				Other		10/18/2023		250mL unpreserved		Lead			
						Water				250mL unpreserved		Lead			
						Soil				250mL unpreserved		Lead			
						Other				250mL unpreserved		Lead			