



Sampling and Analysis Plan

District Drinking Water Lead Sampling

Franklin County R-II School District

Project Number #923446

PREPARED FOR

Franklin County R-II School District
3128 Hwy Y New Haven, MO 63068

Kathy Oetterer
Superintendent/Principal

PREPARED BY

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To Whom it May Concern:

The following Sampling and Analysis Plan has been developed in compliance with the State of Missouri Senate Bill Number 681, also known as the "Get the Lead Out of District Drinking Water Act" and herein referred to as SB681. This plan is developed to comply with section SB681 section 160.011 part 4 (b).

This plan will be made available to students, parents and faculty via the district website. Although this plan is intended to provide the framework for sampling, analysis, communication and reporting, modifications to this plan may be made due to field considerations and additional information if made available.

If you have any questions, please contact your local administrator at:

Email: koetterer@fcr2.org or Phone: 573-237-2414

Respectfully,

Kathy Oetterer

Superintendent

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1.0 Introduction

This plan has been developed in accordance with the requirements set forth in Senate Bill 681 "Get the Lead Out of Districts Act" herein referred to as SB681.

This plan will be utilized by the following District, herein referred to as "the District" to comply with the requirements of SB681:

District Name:	Frankling County R-II School District
District Address:	3128 Hwy Y New Haven, MO 63068
District Administrator:	Kathy Oetterrer

2.0 Inventory

The initial step to completing drinking water sampling for lead in the district is to complete an inventory of the building to determine the plumbing composition, construction dates, number of potential drinking water sources, and types of sources.

The District's facilities staff will complete a tour of the building identifying sources that could potentially be utilized for drinking water by students and faculty. The following sources will be included in the inventory:

- Drinking fountains with single bubbler,
- Drinking fountain with multiple bubblers,
- Drinking fountains with a bubbler and bottle filler,
- Breakroom sinks,
- Built-in or wall mounted sinks in classrooms,
- Exterior spigots,
- Ice machines,
- Hot drink machines,
- Kitchen sinks for food preparation,
- Kitchen pot fillers,
- Kitchen sinks for hand washing,
- Kitchen sinks used for pot and utensil cleaning, and
- Dishwashing equipment (sprayers included).

Based in a review by district staff, the following represents and inventory of the sources to be sampled by district staff:

- Three water fountains with Bottle Fillers
- One kitchen prep sink
- One kitchen wash basin
- One dishwasher

- One ice machine

3.0 Sampling

3.1 Determination

Once a complete inventory of potential drinking water sources is made, sources will be photographed, and a determination will be made on if a source will be included for sampling. For the purposes of this plan, the District will sample all of the sources within the building with the exception of Janitorial Closet Sinks and Bathroom Sinks.

3.2 Sample Labeling

Sample labeling is an important part of the investigation and can assist with sample to source correlation and follow up remediation or additional sampling. In order to ensure all samples are labeled in a consistent manner, the following sample identification scheme has been developed.

Sample identification scheme will consist of a 3-part sample ID using the following information:

- Part 1: A Unique project identifier as noted by the project number referenced in the document. The project number for this sampling event is 923446. Additionally, a unique three letter identifier will be placed after the project number in the sample ID.
- Part 2: A source type identifier consisting of three letters. The following source identifiers will be used for this project:
 - Drinking Fountain Bubbler: 'DFB'
 - Drinking Fountain Bottle Filler: 'DFF'
 - Sink: 'SNK'
 - Exterior or interior water spigot: 'SPG'
 - Ice Machine: 'ICE'
 - Hand Sink: 'HSK'
 - Hot Drink Machine: 'HDM'
 - Additional identifier as deemed necessary.
- Part 3: Sequential numbering scheme. This will consist of three sequential numbers that will be used for all samples based on the order of sampling starting at 001. For instance, the first sample will have the number 001 and the 100th sample will be 100.

Examples:

An example of a unique sample identifier for a drinking fountain bubbler that was the first sample collected in the sampling event would be: '446-DFB-001'.

An example of a unique identifier for a sink that was the 15th sample collected in the sampling event would be: '446-SNK-015'.

Sample identification numbers will be recorded on all sampling forms and will be written in permanent marker on the exterior of the sample container along with the date and time the sample was collected.

3.3 Sample Collection

Sampling will be completed from sources identified for sampling and not excluded using methodology based on the 3T's document. All samples will be collected as 'First Draw' samples which is defined in SB681 as: "*A two-hundred-fifty-milliliter sample immediately collected from a drinking water outlet that has been turned on after a stagnation period of at least eight hours*".

In the 3Ts documentation, recommended stagnation periods are between 8 and 18 hours. In order to prevent concentrations resulting from excessive stagnation periods, sources will be flushed at least 18 hours prior to sampling by allowing the taps to run for approximately 30 seconds. This will only be done for sources that are regularly used during normal District operations. If a source would normally not be used in a less than 18-hour interval, that source will be sampled without flushing.

4.0 Record Keeping

Proper record keeping is critical to ensuring all sampling information is properly recorded, maintained, and made available for the completion of follow up reporting to the Missouri Department of Health and Senior Services (DHSS). The District will maintain the following records related to sampling:

- A copy of field sampling forms for samples collected.
- Photographs of each source location and sources sampled.
- A copy of the chain-of-custody for samples shipped.

Copies of the above documentation will be shared with the District's consultant assisting with this project. Following sampling, the District will maintain the following records to ensure proper reporting to DHSS and for reimbursement records, if available:

- A copy of the sampling report received from the District's consultant after all samples have been analyzed and sample collection information has been uploaded.
- Records for all expenditures related to sampling and remediation. Records include the following:
 - Consultant and Contractor invoices,

- Employee time log and costs for coordination and sampling,
- Cost for purchases of remediation equipment including filters, replacement faucets, replacement bubblers, etc. (NOTE: Bottled water is not eligible for reimbursement),
- Employee time logs and costs for remediation efforts, and
- Administrative time and costs for completing sampling and remediation.

5.0 Key Personnel

The following individuals represent key personnel involved in this important project and their unique roles and responsibilities. Responsibilities may vary from those listed below.

Contact	Title	Organization	Contact Information
Kathy Oetterer	Superintendent	Franklin County R-II School District	Phone: 573-237-2414 Email: koetterer@fcr2.org
Kevin Heriford	Director EH&S	OCCU-TEC, Inc	kheriford@occutec.com
Coy King	Environmental Specialist	Missouri DHSS	Not provided

6.0 Teaching and Communication Plan

6.1 Teaching Plan

In order to provide students and staff with the appropriate information regarding lead in drinking water, the District will send an email outlining the health effects of lead and directing staff to this plan located on the District's website. If the District elects to exclude certain sources from sampling due to source type or the District's opinion regarding the viability of the source as a drinking water source, the District will label all outlets excluded in accordance with 3.0 of this plan. The District will then provide communication instructing teachers and staff on the restrictions for use of these sources and provide information for instructing students regarding proper sources to utilize for drinking.

6.2 Communication Plan

Communication is an important part of completing the sampling and remediation efforts in accordance with SB681. In accordance with 160.011 Part 4(b), districts are required to "Develop a plan for testing each outlet inventoried" and "make such plan available to the public". This plan is intended to satisfy the requirement of Section 160.011 Part 4(b). The sampling plan will be made available on the District's website at the following web address:

<https://www.fcr2.org/>

In accordance with 160.011 Part 4(2)(a) districts are required to “within two weeks after receiving test results, make all testing results and any lead remediation plans available on the District’s website.” In accordance with 160.011 part 4(7)(a), If testing indicates sample results above 5 parts per billion (ppb), the District shall “contact parents and staff via written notification within seven business days after receiving the test results.” The notification will be made via email and include the following:

- The test results and a summary that explains the results.
- A description of any remedial steps taken.
- A description of general health effects of lead contamination and community specific resources. The following websites have information on the health effects of lead:
 - <https://www.epa.gov/lead/what-are-some-health-effects-lead>
 - <https://www.cdc.gov/nceh/lead/prevention/health-effects.htm>
 - <https://health.mo.gov/living/environment/lead/>

7.0 Additional Sampling and Remediation

7.1 Remediation

Remediation to correct elevated concentrations of lead above 5 ppb and prevent additional exposure to students or staff will be completed. Initial remediation will consist of removing the source from service and ensuring that adequate safe drinking water is made available for students and staff.

If testing indicated elevated concentrations entering the building from the main service line, filtration will be installed at the point when the line enters the building to reduce concentrations.

7.2 Retesting and Flush Sampling

After removing the source from service, the fixture will be replaced with a new Lead-safe fixture. Following replacement, follow up sampling will be completed to determine if the remediation was successful. If elevated concentrations persist, flush sampling will be completed to determine if concentrations are a result of lead lines. If it is determined that lead lines within the building are resulting in elevated concentrations, end-of-line filters will be installed to reduce concentrations below 5 ppb.

Once all sources have been remediated, testing will be completed to ensure sources are below 5 ppb. In accordance with SB681, Districts are required to complete annual testing if initial testing indicates results exceeding 5 ppb. If

testing indicates sample results for all samples collected are below 5 ppb, sampling will be completed every five years.

7.3 Documentation and Reporting

7.3.1 Sample Report Documentation

In order to maintain accurate record keeping in compliance with SB681 requirements, the District will maintain records of all activities completed under this plan in a central location for access. The following reports and documentation related to sampling/remediation will be maintained under this plan:

- Sampling Plan.
- Sampling reports and analytical documentation.
- Remedial activities completed.
- Follow up sampling reports.
- Annual and five-year sampling reports.

Reports and sampling documentation will be kept at the following location:

3128 Hwy Y, New Haven, MO 63068

Additionally, electronic copies of all documentation will be stored at the following web address for review:

<https://www.fcr2.org/>

8.0 Signature(s)

The district is committed to providing a safe and healthy environment for education in our community. If you have any questions, please reach out to district representatives. Thank you and have a great day.

Respectfully,

Ms. Kathy

Superintendent