

To: Milwaukee Public Schools

Attention: Interim Superintendent and School Board

Date: February 5, 2025

From: Michael Totoraitis, PhD, Commissioner of Health, City of Milwaukee Health Department

Dear Interim Superintendent Galvan and members of the MPS School Board,

The City of Milwaukee Health Department (MHD) has identified dangerous levels of lead contamination in multiple Milwaukee Public Schools (MPS) buildings. These findings, uncovered through separate case investigations by our Childhood Lead Poisoning Prevention Program (CLPPP), in consultation with the Wisconsin Department of Health Services (DHS), confirm lead hazards inside MPS buildings that exceed state safety standards. Failure to act swiftly and effectively will place children at serious risk of lead poisoning, developmental delays, and other possible health complications. In this letter, MHD outlines its timeline of discoveries, its summarized findings, and priority recommendations for MPS's corrective action.

Summary of Lead Hazard Findings

In January 2025, MHD conducted lead risk assessments at multiple MPS locations in response to concerns raised by parents during elevated blood lead level (EBLL) investigations. Testing methods included visual inspections, XRF (X-ray fluorescence) testing, dust wipe sampling, soil sampling, and water sampling.

The results revealed widespread high lead dust wipe levels exceeding [DHS 163.15](#) standards for lead dust hazards on floors and sills that must be immediately addressed.

Below is a summary of findings by school:

Golda Meir School

- **Inspection Type**
Lead Risk Assessment (Visual, Water Testing, XRF, Dust Wipes, Soil Samples)
- **Results**
Lead dust levels in multiple areas exceed safety standards, confirming widespread lead hazards throughout the school.
 - **Ground floor**
The mean lead dust level on the ground floor is **67.5 µg/ft²**, exceeding the safety threshold of 10 µg/ft², meaning all floors are considered hazardous.
 - **Windowsills**
The mean lead dust level is **1417.9 µg/ft²**, far surpassing the safety threshold of 100 µg/ft², confirming all windowsills as hazardous.
- Even in areas where MPS attempted lead stabilization, hazards remain.
 - **Bathroom Wall**
Previously identified as the child's exposure source, tested at **200 µg/ft²** on adjacent floors, indicating inadequate cleaning protocols and persistent lead dust hazards.
- Additional high-risk areas where lead dust can transfer through routine contact include:
 - **Storage rooms**
 - **Specials needs classrooms**

- **Teacher lounges**

- **Teacher's Lounge Findings**

Windowsill lead dust measured **3200 µg/ft²**, and floor lead dust measured **21 µg/ft²**, both exceeding safety levels.

A full lead risk assessment is complete, aside from pending water samples, and will be made available soon.

Action Needed

- Immediate stabilization of all paint surfaces, thorough clearance-level cleaning, and implementation of a Lead Paint Management Plan to ensure ongoing compliance.
 - Upon completion of the lead risk assessment, MHD will be issuing corrective orders.
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Kagel Elementary School

- **Inspection Type**

Lead Risk Assessment (Visual, Water Testing, XRF, Dust Wipes, Soil Samples)

- **Results**

Presence of deteriorated lead paint and high lead dust wipe levels, exceeding safety thresholds.

- **Ground floor windowsill**

Measured **1600 µg/ft²**, exceeding the DHS 163 safety threshold of 100 µg/ft² for sills.

- **Storage Room Floor**

Measured **340 µg/ft²**, exceeding the DHS 163 safety threshold of 10 µg/ft² for floors.

- A full lead risk assessment is still being finalized, including water sample results, and will be made available soon.

Action Needed

- Same as Golda Meir – immediate stabilization of all painted surfaces, clearance-level cleaning, and implementation of a Lead Paint Management Plan.
 - Upon completion of the lead risk assessment, MHD will be issuing a corrective order.
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Milwaukee Chinese Immersion School

- **Inspection Type**

Visual Inspection Only (*Note: Most of the building was constructed post-1978, with extensive renovations in pre-1978 areas per MPS records*).

- **Results**

No lead hazards identified.

- **Action Needed**
Continue maintenance of painted surfaces in compliance with a Lead Paint Management Plan.
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Maryland Avenue Montessori

- **Inspection Type**
Preliminary Inspection (Visual, Dust Wipes)
 - **Results**
Strong potential presence of deteriorated lead paint; dust wipe sample results are pending.
 - **Action Needed**
Stabilization of all painted surfaces, clearance-level cleaning, and implementation of a Lead Paint Management Plan.
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Priority Recommendations for MPS

After extensive testing and review, **MHD has determined that MPS must immediately and significantly improve its detection, monitoring, and control of lead hazards.** The following immediate steps must be taken to prevent exposing children to harmful levels of lead:

- **Revise and Strengthen MPS's Lead Management Plan**
 - MPS must consult with DHS and MHD to enhance its plan and ensure it meets or exceeds compliance with state and federal statutes, while minimizing risk to students and faculty.
(Wisconsin Administrative Code DHS 163 is designed to protect children from hazardous lead exposure during building renovation or lead hazard reduction activities.)
 - Establish clear, phased timelines for immediate lead remediation and long-term preventative strategies based on risk level.

- **Prioritize High-Risk Facilities for Testing and Remediation**

MPS must prioritize inspecting facilities based on:

- **Year of construction pre-1978**
Building constructed prior to before 1978 may contain lead-based paint and associated hazards. Note that due to voluntary reductions in lead paint concentration, buildings constructed prior to 1950 are potentially more hazardous than buildings constructed between 1951 – 1978. Furthermore, if MPS is notified of an elevated blood lead level case, immediate priority should go to the child's school, especially if it was built before 1900.
 - + **Assume lead paint unless otherwise verified**
In all schools built pre-1978, unless a lead inspection risk assessment or renovation work has verified that a surface is lead free, then MPS should assume surfaces as a leaded surface.
- **Regularly attended by children under age 6**
Per the definition of child occupied facility per DHS 163.03(12). Children under 6 are at increased risk of lead poisoning and its effects due to a combination of biophysiological factors (such as their size

and metabolic rate) and behavioral characteristics (including play habits and hand-to-mouth behavior).

- **Poor condition**
Facilities with a previous record of deterioration, especially peeling or chipping paint, may expose children to hazardous lead dust and must be considered highest priority.
- **Fully Abate and/or Control Identified Lead Hazards Based on MHD Inspection Results**
 - Any confirmed lead hazards must be immediately addressed through state certified lead abatement or renovations workers.
- **Review and update cleaning and lead dust prevention protocols**
 - Increase cleaning frequency for all horizontal surfaces within a child's reach (e.g., floors, sills, bookshelves).
 - Employ more effective methods – such as HEPA-vacuuming and wet cleaning with disposable wipes – to prevent the spread of lead dust.
- **Review existing DHS lead safe certifications and identify training needs among staff**
 - Consult with DHS Lead and Asbestos staff to ensure MPS has the appropriate company and individual certifications to identify existing lead hazards and conduct lead-safe work. These certifications may include:
 - Lead company certification
 - Lead Safe Renovator, Lead Abatement Worker, Lead Abatement Supervisor
 - Lead Risk Assessor
 - MPS's state certification as a lead-free company appears to have expired at the end of 2022. MPS should renew this as soon as possible in order to address hazards in state defined child-occupied facilities.
 - MPS does have a number of staff certified as lead safe renovators, but it appears it only has two lead risk assessors. The number of lead risk assessors on staff should be increased to enhance MPS's ability to detect lead hazards. MPS should consider staffing a number of lead risk assessors based on the number of buildings constructed pre-1978.
- **Consider lead hazards from non-paint sources**
 - MPS has its own water testing and filtration plan. MHD recommends that MPS revisits this plan to ensure it is updated and followed through.
 - MHD did observe in some schools that signage can be improved on utility sinks as they may have leaded pipes and faucets. Signage should warn of potential lead hazards that may be present in the water.
 - MHD has taken water samples from MPS schools, as shared earlier, and will report back when results are processed.
- **Proactively mitigate risks to students with developmental disorders**
 - Both the academic research and MHD practice indicate that children with pervasive developmental disorders are at an increased risk of lead poisoning. For instance, children with autism may exhibit

pica behaviors that increase the risk of ingesting lead-contaminated dust, while nutritional deficiencies can increase lead uptake in the body.

- While state statutes relevant to lead poisoning do not specifically reference children with special needs, it's important to recognize that these vulnerabilities can extend beyond the age of six.
- Subject matter experts must evaluate the facility maintenance and cleaning protocols to ensure they effectively address the needs of these students.

MPS's Responsibility and Legal Obligations

Under Wisconsin Administrative Code DHS 163 and [254](#), it is the responsibility of the building owner—in this case, MPS—to ensure all facilities are safe from hazardous lead exposure.

MHD does not routinely inspect schools unless a lead hazard concern is reported through an elevated blood lead level (EBLL) case investigation. Due to the confirmation of lead hazards in select MPS facilities, MHD will continue monitoring and anticipates prompt corrective action from MPS leadership.

Next Steps and Accountability

Given the scope of elevated lead hazards found in MPS facilities, it is the responsibility of MPS to take immediate action to remediate these dangers and ensure a safe environment for students and staff.

Failure to act promptly not only jeopardizes children's health but could also result in state or local enforcement measures.

The situation warrants a detailed action plan

- The timeline for remediation of each affected school
- Recommended edits to the district's Lead Management Plan
- Verification that remediation efforts have been completed

MHD remains available for further consultation and technical assistance. We expect a formal response from MPS outlining its action plan within 30 days of receiving this letter, no later than Friday, March 21, 2025.

Sincerely,



Michael Totoraitis, PhD
Commissioner of Health
City of Milwaukee Health Department