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August 30, 2017

Greg Benthin
101 Sorbin Avenue West
Gates, OR 97346

**RE: Lead Action Level Exceedance
City of Gates, PWS ID# 4100317**

Dear Greg:

City of Gates is a system with corrosion control treatment that recently exceeded the 90th percentile action level for lead. The action level set by the Environmental Protection Agency is 0.015 mg/L for lead and the level at Gates was 0.0222 mg/L. As a result, Gates must respond by taking certain actions within the appropriate timeframes. In order to comply with the Lead and Copper Rule, the Oregon Health Authority - Drinking Water Services (OHA-DWS) requires the following steps to be completed:

1. Since the lead action level was exceeded, OAR 333-061-0034(5) requires that a lead public education (PE) brochure must be distributed to all customers within 60 days of the end of the monitoring period in which the lead action level was exceeded (**due by 11/30/17**). The PE brochure should be reviewed and approved by the regulatory agency prior to being sent out to customers. A final copy of the PE and a certification that the PE was distributed as required must be sent to the regulatory agency within 70 days of the end of the monitoring period in which the lead action level was exceeded (**due by 12/10/17**). Note: the PE must be distributed to all customers annually as long as the 90th percentile lead action level is exceeded.
2. Immediately investigate whether there is a problem with the existing corrosion control treatment system. If a problem is found, repair the treatment system. Notify the regulatory agency in writing **by 12/31/17** whether a problem was found with the corrosion control treatment system and how it was corrected, or what changes will be made to ensure lead levels will not be exceeded in the future.
3. Conduct two 6-month rounds of lead and copper tap monitoring at 10 sites. The first round must be collected between 1/1/18 and 6/30/18 and the results reported

to DWS **by 7/10/18**. The second round must be collected between 7/1/18 and 12/31/18 and reported to DWS **by 1/10/19**.

4. Two rounds of water quality parameters (WQP) testing that includes pH and alkalinity must be collected with each 6-month round of lead and copper tap sampling from the distribution system at a routine coliform sample site. The pH should be analyzed directly in the field with a calibratable, temperature-compensating, electrode-type pH meter that is calibrated before each reading. The first two rounds must be collected between 1/1/18 and 6/30/18 and the results reported to DWS **by 7/10/18**. The second two rounds must be collected between 7/1/18 and 12/31/18 and reported to DWS **by 1/10/19**.
5. Continue measuring WQPs including pH and alkalinity at least every 2 weeks at the entry point. If minimum entry point WQPs are not being met, monitor WQPs daily until required minimum levels are consistently met. If the minimum entry point WQPs were being met when the lead action level exceedance occurred, minimums may need to be reevaluated and adjusted (for example, minimum pH raised).
6. Since the lead action level was exceeded, OAR 333-061-0034(5)(c)(B)(v) requires Community water systems to provide the following informational statement on or in each water bill (beginning with the next bill) no less often than quarterly and as long as the lead action level is exceeded: “[PWS NAME] found high levels of lead in drinking water in some homes. Lead can cause serious health problems. For more information please call {PWS CONTACT and PHONE NUMBER or PWS WEBSITE (if applicable)}”.
7. Community water systems are required to provide a notice of individual lead tap results to the occupants of residences where the taps were tested, including those that do not receive water bills, within 30 days of receiving the results. See OAR 333-061-0034(5)(e) for required notice content. A copy of the notice and a certification that the notice was distributed as required by the above OAR is due to the regulatory agency within three months following the end of the monitoring period (**due by 12/31/17**). Note: the consumer notice is a requirement regardless of whether the lead and/or copper action levels were exceeded or not.
8. Collect a water sample at the entry point to the distribution system and have it analyzed for lead and copper. This sample will be used to determine the source water lead and copper contribution and therefore should be flushed long enough so

that you are capturing source water. This sampling must be done within 6 months of the end of the monitoring period in which the lead action level was exceeded **(due by 3/31/18)**.

9. Community water systems must report the following in their Consumer Confidence Report (CCR): the 90th percentile value of the most recent round of sampling, the number of sample sites exceeding the action level, and the lead-specific information in OAR 333-061-0043(4)(c). Note: the lead-specific information is required in all CCRs regardless of whether the lead and/or copper action levels were exceeded or not.

If the action level for lead or copper continues to be exceeded during 6-month rounds of monitoring, the water supplier may be required to reassess if the current corrosion control treatment system is adequate or whether a different chemical treatment option should be considered.

The Lead and Copper Rule is extensive and can be complicated. Please contact your drinking water program regulatory contact for assistance. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregg Baird". The signature is stylized with a large, sweeping flourish at the end.

Gregg Baird, REHS
Oregon Health Authority, Drinking Water Services

Cc: DMCE