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September 13, 2021

STEVE PENNINGTON  
GARDEN VALLEY WATER ASSOCIATION  
58475 LITTLE CREEK DRIVE  
COQUILLE, OR 97423

**RE: Lead Action Level Exceedance**  
GARDEN VALLEY WATER ASSOCIATION (PWS OR4100214)

Dear STEVE PENNINGTON:

Tap water samples at the GARDEN VALLEY WATER ASSOCIATION water system recently exceeded the action level of 0.015 mg/L for lead. As a result, you must complete the actions specified in this letter as soon as possible and no later than the dates identified.

- Add lead information to water bill starting with next bill sent out.
- Immediately distribute Public Education. Certification that it was completed must be reported by 12/10/2021;
- Written review of corrosion control treatment and corrections by 12/31/2021;
- Lead and copper samples from each entry point by 3/31/2022;
- Collect WQP and demonstration tap samples in the next two 6-month monitoring periods reported by 7/10/2022 and 1/10/2023 respectively

These steps are further described as follows:

1. OAR 333-061-0034(5)(c)(B)(v) requires you to provide the following informational statement on or in each water bill (beginning with the next bill) and 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)}”. Remember to replace the information in all CAPS with the appropriate information for your system.
2. OAR 333-061-0034(5)(c)(B) requires that a lead public education (PE) brochure must be distributed to all customers by 11/30/2021. 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 Drinking Water Services (DWS) by 12/10/2021. Note: the PE must be distributed to all customers annually as long as the 90<sup>th</sup> percentile lead action level is exceeded.

3. Immediately investigate whether there is a problem with the existing corrosion control treatment system and repair any problems found. Notify the regulatory agency in writing by 12/31/2021 whether a problem was found with the corrosion control treatment system and how it was corrected, or what changes will be made to ensure action levels will not be exceeded in the future.
4. OAR 333-061-0036(10)(g)(A) requires you to 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. This sampling must be reported by 3/31/2022.
5. Conduct two 6-month rounds of lead and copper tap monitoring at 5 sample sites. The first round must be collected between [1/1/2022 and 6/30/2022] and the results reported to DWS by 7/10/2022. The second round must be collected between 7/1/2022 and 12/31/2022 and reported to DWS by 1/10/2023.
6. Two rounds of water quality parameters (WQP) collected from the distribution system at a routine coliform sample site with each round of tap samples. These WQP samples must be collected 2 weeks apart and include pH and alkalinity. The pH should be analyzed directly in the field. The first two rounds must be reported to DWS by 7/10/2022 and the second two rounds must be reported to DWS by 1/10/2023.
7. Continue measuring WQPs 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).

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.

Finally, a couple of requirements that apply to all systems regardless of test results:

- You must notify those drinking the water at each location of the test results within 30 days of receiving them from the lab. A representative copy of the notice and certification of distribution must be submitted by 12/31/2021. The notification must also include the maximum contaminant level goal and the action level for lead with the definitions for these two terms, an explanation of the health effects of lead, a list of steps consumers can take to reduce exposure to lead in drinking water and contact information for your water utility.
- Consumer Confidence Report (CCR) must include the 90<sup>th</sup> 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).

The lead and copper regulations are extensive and can be complicated. Please contact Kent Downs at (541) 214-4786 for assistance. Thank you for your prompt attention to these requirements.

Sincerely,

Oregon Health Authority, Drinking Water Services

Cc: Kent Downs, DWS