



# Linn County Department of Health Services

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www.co.linn.or.us/health

*"Working together to promote the health and well-being of all Linn County residents."*

April 3, 2018

Mr. Joe Anthony  
Weslinn Water Company  
PO Box 131  
Brownsville, OR 97327

**RE: Copper Action Level Exceedance and Treatment at Weslinn Water Company,  
PWS #41-00230**

Dear Mr. Anthony:

Thank you for conducting the water quality parameter monitoring last summer as well as the recent aeration study. Based on those findings, we are approving raising pH by the aeration method of corrosion control treatment that Weslinn Water Company previously recommended per Oregon Administrative Rule (OAR) 333-061-0034(2)(b).

Flowchart 2a in *"Optimal Corrosion Control Treatment Evaluation Technical Recommendations for Primacy Agencies and Public Water Systems"* (USEPA, 2016) outlines treatment options for Weslinn's water quality conditions – that is, when the exceedance is for copper only (not lead), the pH is <7.2, and DIC >35 mg/L. It is interesting that the flowchart in the 2016 manual does not list aeration as optimal treatment. In the previous version of this EPA manual, Flowchart 2a includes aeration for these water quality conditions. Weslinn's recent "bench test" indicates aeration is effective at raising pH for these conditions. Additionally, the current (USEPA, 2016) Flowchart 2a for the DIC range of 5 to 35 mg/L includes aeration as a recommended treatment, as well as a footnote *"May be most appropriate at higher end of DIC range"* which supports the observation of Weslinn's bench test. Westlinn's DIC is 36-37, so barely over the 35 mg/L threshold in the flowchart. Thus, it appears aeration is an appropriate treatment for Weslinn's conditions. Weslinn may need to reconsider other appropriate treatment if the action levels for lead or copper continue to be exceeded after aeration is installed.

Weslinn's next actions and schedule to comply with the Lead and Copper Rule are listed below:

Administration Office 541-967-3888 Fax: 541-924-6904 fmoore@co.linn.or.us	Alcohol & Drug Treatment 541-967-3819 Fax: 541-967-7259 thowell@co.linn.or.us	Developmental Disabilities 541-967-3890 Fax: 541-924-6905 jsneddon@co.linn.or.us	Environmental Health 541-967-3821 Fax: 541-924-6904 rpartilo@co.linn.or.us	Mental Health 541-967-3866 Fax: 541-928-3020 tnoble@co.linn.or.us	Public Health 541-967-3888 Fax: 541-926-2102 pcozier@co.linn.or.us
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1. The water supplier must submit the specific plans and a review fee to OHA-Drinking Water Services (DWS) no later than **December 1, 2018**, for plan review and approval before treatment is added (OAR 333-061-0060).
2. The designated corrosion control treatment (i.e. aeration) needs to be installed no later than **December 1, 2019** (OAR 333-061-0034(2)(b)).

The Plan Review process (#1 above) requires that new or modified system components comply with public water system regulations. Our plan review website is <http://healthoregon.org/pwsplanreview>. There is a plan review information “packet” on that webpage specifically for adding Corrosion Control Treatment. Plan review staff may be reached at: (971)673-0408, [dws.planreview@dhsoha.state.or.us](mailto:dws.planreview@dhsoha.state.or.us), or by mail at:

Attn: Plan Review  
OHA Drinking Water Services  
800 NE Oregon St, Ste 640  
Portland, OR 97232-2162.

Jay MacPherson, a plan review engineer with which you have already corresponded, may also answer specific questions about the plan review process. You may reach him at 541/726-2587 x 57, or [james.r.macpherson@dhsoha.state.or.us](mailto:james.r.macpherson@dhsoha.state.or.us).

Once the corrosion control treatment has been installed, Weslinn will need to begin monitoring the pH at the entry point to the distribution system, recording this amount at least every two weeks on a form that OHA-DWS provides, and submitting it each month. More information on monitoring and reporting will be provided at that time.

If you have any questions or concerns, please contact me at (541) 967-3821 ext. 2098.

Sincerely,



Alyson Reynolds, REHS  
Linn County Environmental Health Program

CC: DWS Master Water System File

Enclosure:

EPA Flowchart 2a: Selecting Treatment for Copper Exceedance Only with pH < 7.2