PUBLIC HEALTH DIVISION
Center for Health Protection, Drinking Water Services
Kate Brown, Governor

Oregon Health Authority

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October 5, 2017

Gean Oschner
Old Sheep Ranch Water Association
P.S. Box 1016
Langlois, OR 97450

RE: Copper Action Level Exceedance at Old Sheep Ranch Water Assn, PWS #05860

Dear Ms. Oschner:

There are a couple matters related to lead and copper and corrosion control at your water system that we need to address: one related to an unresolved copper exceedance, and the other concerns alkalinity data we are requiring of all water systems using soda ash. Please contact me or Kent Downs if any of this information is unclear.

1. The tap water samples at the Old Sheep Ranch water system exceeded the action level of 1.3 mg/L for copper at two locations in 2015. No sample invalidation and re-sampling occurred during that monitoring period. As a result, you must:
   - Conduct two 6-month rounds of lead and copper tap monitoring at 5 sample sites. The first round must be collected in the first half of 2018, 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. These results will determine whether the lead and copper sampling schedule may be reduced again.
   - Check the enclosed handout to see if your existing lead and copper sampling locations meet the criteria, or if any locations need to be changed. The EPA has clarified that we can no longer invalidate samples because a tap was not in regular use, so be sure to review the locations and change any if needed before conducting these rounds of lead and copper monitoring.
   - Meanwhile, continue to measure/record the pH as usual at least every 2 weeks at the entry point. If the minimum pH is not met, make necessary adjustments and monitor it daily until required minimum levels are consistently met.

   If the action level for lead or copper continues to be exceeded during the 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.

2. Our program is currently collecting alkalinity data for those water systems using soda ash as part of their corrosion control treatment. You would have received a letter requesting this data with your next scheduled round of lead and copper testing anyway, so best to do it now with your upcoming monitoring rounds.

   Soda ash affects alkalinity, which is the capacity of water to neutralize acid. Establishing and maintaining minimum water quality parameters (WQP) for optimal corrosion control is a requirement of the lead and copper rule, OAR 333-061-0036(2)(c)(F)(iii). Though a pH minimum value was established in the past, a minimum alkalinity value was not. Together with the pH and other physical parameters of your water, the alkalinity levels in your water system affect the ability of your chemical corrosion control treatment system to prevent lead and copper release. In order to set this minimum value for alkalinity, we need alkalinity data collected during lead and copper tap sampling.

   Please sample for alkalinity in addition to pH during your upcoming regulatory rounds of lead and copper tap monitoring as follows:
   - For each 6-month sampling period, collect two rounds of pH and alkalinity data (also known as water quality parameters, or WQP) approximately two weeks apart. Each round will include one sample from the Entry Point (EP) to the distribution system (representing treated water), and at least one sample from the distribution system representative of normal distribution water quality, such as at a coliform sampling site.
   - The second round of alkalinity sampling should ideally be collected during the week of lead and copper tap sampling at the same sample locations as the first round, EP and distribution.

To present this another way:

<u>January 1st – June 30th, 2018</u>:

Sample pH and alkalinity at Entry point and distribution; once approximately two weeks *before* and once *during* the week of lead and copper monitoring. (Total of 4 results - 2 at EP and a minimum of 2 from distribution at different times). Report these results by 7/10/18.

<u>July 1st – December 31st, 2018</u>:

Same as above - sample pH and alkalinity at both the EP and in the distribution two weeks apart (total of 4 results), including one set collected during the week of lead and copper monitoring. Report these results by 1/10/19.

The pH should be analyzed directly in the field. Alkalinity monitoring may be conducted using either an EPA-approved field method (such as the titration method)

or through an accredited laboratory. Please send the alkalinity data directly to your regulator, Kent Downs (see contact info below), not to the state data management unit.

Finally, the following requirements for lead and copper monitoring apply to all systems:

- Notification to sampled locations:
  - Within 30 days of receiving the lead and copper test results from the lab, you must notify those drinking the water of the lead and copper test results for their specific location (not the pH or alkalinity). This notification must 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.
  - Within 90 days of receiving results, also submit a representative copy of this notice and a "certification of distribution" to Drinking Water Services.

  Templates for the consumer notification and certification of distribution may be found under the "Lead and Copper" heading on our website here: http://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/MONITORING/Pages/monitoring.aspx. Which version of the consumer notification you use will depend on the lead and copper results.

- Consumer Confidence Report (CCR): Include in the 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).

The lead and copper regulations are extensive and can be complicated. Please contact Kent Downs with Curry Community Health at 541-425-1607 for assistance, or me at (541) 726-2587 ext. 30. Thank you for your prompt attention to these requirements.

Sincerely,

Betsy Parry, R.E.H.S.
Oregon Health Authority, Drinking Water Services

Cc: Brad Daniels, DWS
Kent Downs, Environmental Health, Curry Community Health

Enclosures:
Certification of Notice to Individual Consumers
Lead and Copper Sample Selection Site Criteria