



October 21, 2021

NESTUCCA VALLEY ELEMENTARY SCHOOL  
BILL WILKSON  
34660 PARKWAY DRIVE  
CLOVERDALE, OR 97112

**RE: Lead and Copper Action Level Exceedance at OR4190595**

Dear BILL WILKSON:

NESTUCCA VALLEY ELEMENTARY SCHOOL recently exceeded the action levels of 0.015 mg/L for lead and 1.3 mg/L for copper. Due to the health effects associated with exposure to lead and copper, you must complete the actions specified in this letter as soon as possible and no later than the dates identified.

- Two rounds of water quality parameters (WQPs) in distribution by 12/03/2021;
- Two rounds of water quality parameters (WQPs) from each entry point by 12/03/2021;
- Immediately distribute Public Education. Certification that it was completed must be reported by 3/10/2022;
- Lead and copper samples from each entry point by 06/30/2022;
- Written recommendation to comply with lead and copper rule by 06/30/2022;
- Submit plans for corrosion control treatment by 12/31/2023;
- Approved corrosion control treatment by 6/30/2024;

These steps are further described as follows:

1. Collect 2 rounds of distribution water quality parameters (WQP) that includes temperature and pH (measured at time of collection), alkalinity, conductivity, and calcium. These can be collected from a coliform sample location. The first round should be collected as soon as possible and the second round two weeks later. Submit these results no later than 12/03/2021. [OAR 333-061-0036(10)(f)(E) and (F)]
2. Collect two rounds of source water quality parameters (WQP) from each entry point to the distribution that includes the same items listed above. The first round should be collected as soon as possible and the second round two weeks later. Submit these results no later than 12/03/2021. [OAR 333-061-0036(10)(f)(E) and (F)]

3. Immediately issue lead public education (PE) brochure to all persons served by the water system and post in a common area. The PE brochure must be submitted to the regulatory agency prior to being sent out. Certification that PE was distributed must be submitted no later than 3/10/2022. PE must be redistributed annually as long as the 90<sup>th</sup> percentile lead action level is exceeded. [OAR 333-061-0034(5)]
4. Collect and submit no later than 6/30/2022 a lead and copper sample from each entry point. These results are needed as soon as possible as they are considered in the next step. [OAR 333-061-0036(10)(g)(A)]
5. Using the sample results above, provide a written recommendation to the regulatory agency identifying how you will ensure Lead and Copper are below the action level. You can determine the optimal corrosion control for your system using consultation with regulating agency staff (contact information at the end of this letter) or if eligible, you can also ask the circuit rider for assistance. The letter of recommendation must be submitted to the regulatory agency no later than 6/30/2022. [OAR 333-061-0034(3)]
6. Submit the construction plans for the corrosion control treatment no later than 12/31/2023. For more information about submitting plans and the required forms, please see [www.healthoregon.org/pwsplanreview/](http://www.healthoregon.org/pwsplanreview/). Be sure to include the required fees with your plan submission. Note: plans must be submitted and approved before treatment is installed. [OAR 333-061-0060 (1) & (3)]
7. The approved corrosion control treatment must be installed no later than 6/30/2024. [OAR 333-061-0034(2)(b)(E)]

As a reminder, you must notify those drinking the water at each location of the lead 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 3/31/2022. 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.

You need to submit the above documentation to Drinking Water Services no later than the due dates listed above in one of the following ways:

- Fax the report to (971) 673-0694  
For faxed data, please include a cover sheet with the number of pages including the cover, your name, and your phone number.
- Email the report to: [dwp.dmce@state.or.us](mailto:dwp.dmce@state.or.us)

- Mail the report to: Water Quality Reports  
P.O. Box 14350  
Portland, OR 97293-0350

The Lead and Copper Rule is extensive and can be complicated. Please contact Jaime Craig/Allison Bonato/June Hemmingway at (503) 842-0909 for assistance. Thank you for your prompt attention to these requirements.

Sincerely,  
Oregon Health Authority, Drinking Water Services

Cc: Evan Hofeld, DWS  
Jaime Craig/Allison Bonato/June Hemmingway, TILLAMOOK COUNTY



December 14, 2021

NESTUCCA VALLEY ELEMENTARY SCHOOL  
BILL WILKSON  
PO BOX 99  
CLOVERDALE, OR 97112

**RE: Lead and Copper Action Level Exceedance at OR4190595**

Dear Mr. Wilkson:

Nestucca Valley Elementary School recently exceeded the action levels of 0.015 mg/L for lead and 1.3 mg/L for copper. A letter was sent out from our office dated October 21, 2021. The [steps outlined in the October 21, 2021 letter](#) will still need to be followed and are summarized here, *with two additional options described below*:

1. Two rounds of water quality parameters (WQPs) in distribution by 12/03/2021;
2. Two rounds of water quality parameters (WQPs) from each entry point by 12/03/2021 – **completed 12/2/2021**;
3. Immediately distribute Public Education. Certification that it was completed must be reported by 3/10/2022 – **completed 10/28/21**;
4. Lead and copper samples from each entry point by 06/30/2022;
5. Written recommendation to comply with lead and copper rule by 06/30/2022. ***If one of the two options (A. or B.) described below is successfully completed, corrosion control treatment may not be needed***;
6. Submit plans for corrosion control treatment if needed by 12/31/2023;
7. Approved corrosion control treatment or otherwise deemed to be in compliance by 6/30/2024;

**This follow-up letter is to clarify that two additional options are available but must be completed within the timeline stated above.**

- A. Additional plumbing and/or plumbing fixtures may be replaced and re-sampled to demonstrate they are below the lead and copper action levels; or
- B. Completing at least two rounds of lead and copper tap sampling from the same 10 sites sampled six months apart (e.g., 1/1/2022 – 6/30/2022 for the first round and 7/1/2022 – 12/31/2022 for the second round) demonstrates levels are less than both the lead and copper action levels.

These two options are discussed in greater detail as follows:

- A. In lieu of installing chemical corrosion control treatment, you have the option to implement a plumbing replacement program (PRP) which includes identifying and sampling all representative sample locations, replacing fixtures and/or plumbing at sites that exceed the lead or copper action level. Resampling at all sites that performed replacements is required to determine if the replacement was effective. **PRP must be completed by January 1, 2023. Note: If not effective, installation of corrosion control treatment will still be required by June 30, 2024.**
  
- B. Systems can postpone installation of corrosion control treatment if two consecutive 6-month lead and copper rounds are collected prior to the installation deadline and results are at or below both action levels. **Note: If the action level for either lead or copper is exceeded during either of these 6-month rounds, the system must complete installation of the corrosion control treatment by June 30, 2024.**

Please contact Jaime Craig at (503) 842-0909 by January 1, 2022 if interested in pursuing either of these two options.

As a reminder, you must notify those drinking the water at each location of the lead test results within 30 days of receiving them from the lab. A representative copy of the notice and certification of distribution must also be submitted to our office. 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. You can submit this documentation to Drinking Water Services via fax at (971) 673-0694 (include a cover sheet with the number of pages, your name, and phone number) or via e-mail to [dwp.dmce@dhsoha.state.or.us](mailto:dwp.dmce@dhsoha.state.or.us)

Thank you for your prompt attention to these requirements.

Sincerely,  
Oregon Health Authority, Drinking Water Services

Cc: Evan Hofeld, DWS  
Jaime Craig, Tillamook County