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October 28, 2019

JEFF THIESSEN ELMIRA HIGH/ELEMENTARY 88834 TERRITORIAL RD ELMIRA, OR 97437

RE: Copper Action Level Exceedance ELMIRA HIGH/ELEMENTARY (PWS OR4191805)

Dear JEFF THIESSEN:

Tap water samples at the ELMIRA HIGH/ELEMENTARY water system recently exceeded the action level of 1.3 mg/L for copper. As a result, you must complete the actions specified in this letter as soon as possible and no later than the dates identified.

- Written review of corrosion control treatment and corrections by 12/31/2019;
- Lead and copper samples from each entry point by 12/31/2019;
- Collect WQP and demonstration tap samples in the next two 6-month monitoring periods reported by 7/10/2020 and 1/10/2021 respectively

These steps are further described as follows:

- 1. 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 12/31/2019 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.
- 2. 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 and therefore should be flushed long enough so that you are capturing source water. This sampling must be reported by 12/31/2019.
- 3. Conduct two 6-month rounds of lead and copper tap monitoring at 20 sample sites. The first round must be collected between 1/1/2020 and 6/30/2020 and the results reported to DWS by 7/10/2020. The second round must be collected between 7/1/2020 and 12/31/2020 and reported to DWS by 1/10/2021.

- 4. 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 7/10/2020 and the second two rounds must be reported to DWS by 1/10/2021.
- 5. Restart measuring and reporting 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). These WQP reports are due monthly by the 10th for the previous month.

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.

As a reminder, 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 12/31/2019. 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.

The lead and copper regulations are extensive and can be complicated. Please contact Amy Bleekman at 541-682-3955 for assistance. Thank you for your prompt attention to these requirements.

Sincerely,

Oregon Health Authority, Drinking Water Services

Cc: Jay MacPherson, DWS Amy Bleekman, Lane County