



October 28, 2019

CHERYL GOODSON  
RENAISSANCE PUBLIC ACADEMY  
PO BOX 208  
MOLALLA, OR 97038

**RE: Lead and Copper Action Level Exceedance  
RENAISSANCE PUBLIC ACADEMY (PWS OR4193717)**

Dear CHERYL GOODSON:

Tap water samples at the RENAISSANCE PUBLIC ACADEMY water system recently exceeded the action levels of 0.015 mg/L for lead and 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.

- Immediately distribute Public Education. Certification that it was completed must be reported by 3/10/2020;
- Written review of corrosion control treatment and corrections by 3/31/2020;
- Lead and copper samples from each entry point by 3/31/2020;
- 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. Since the lead action level was exceeded, OAR 333-061-0034(5)(c)(D) requires that a lead public education (PE) brochure must be distributed to all persons served by the water system and post in a common area by 2/29/2020. 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 3/10/2020. Note: the PE must be redistributed annually as long as the 90<sup>th</sup> percentile lead action level is exceeded.
2. 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 3/31/2020 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.

3. 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 3/31/2020.
4. Conduct two 6-month rounds of lead and copper tap monitoring at 10 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.
5. 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.
6. 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.

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 3/31/2020. 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 Joel Ferguson at 503-742-5367 for assistance. Thank you for your prompt attention to these requirements.

Sincerely,

Oregon Health Authority, Drinking Water Services

Cc: James Nusrala, DWS  
Joel Ferguson, Clackamas County