

September 24, 2025

SHAWNA GRANT
NINETY-ONE ELEM SD 91
1130 S IVY STREET
CANBY, OR 97013

RE: Lead Action Level Exceedance at NINETY-ONE ELEM SD 91, OR4193718

Dear SHAWNA GRANT,

Recent samples exceeded the action level of 0.015 mg/L for lead. Due to the health effects associated with exposure to lead, you must complete the actions specified in this letter as soon as possible and no later than the dates identified.

1. Immediately issue public notice and submit a copy by 10/05/2025;
2. Report two rounds of water quality parameters (WQPs) measured in distribution by 11/05/2025;
3. Report two rounds of water quality parameters (WQPs) measured at each entry point by 11/05/2025;
4. Distribute Public Education. Certification that it was completed must be reported by 12/10/2025;
5. Report lead and copper samples from each entry point by 3/31/2026;
6. Submit a written recommendation to comply with lead and copper rule by 3/31/2026;
7. Submit plans for corrosion control treatment by 9/30/2027;
8. Install approved corrosion control treatment by 3/31/2028;

These steps are described in more detail below:

1. Issue a public notice to all customers within 24 hours and submit a copy by 10/05/2025. A copy of the public notice template is enclosed. Methods to submit a copy of the public notice are provided in the letter.
2. 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. Report these results no later than 11/05/2025. [OAR 333-061-0036(10)(f)(E) and (F)]

3. 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. Report these results no later than 11/05/2025. [OAR 333-061-0036(10)(f)(E) and (F)]
4. 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 12/10/2025. PE must be redistributed annually as long as the 90th percentile lead action level is exceeded. [OAR 333-061-0034(5)]
5. Collect and report no later than 3/31/2026 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)]
6. 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 3/31/2026. [OAR 333-061-0034(3)]
7. Submit the construction plans for the corrosion control treatment no later than 9/30/2027. For more information about submitting plans and the required forms, please see 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)]
8. The approved corrosion control treatment must be installed no later than 3/31/2028. [OAR 333-061-0034(2)(b)(E)]

In lieu of installing chemical corrosion control treatment, Non-Transient Non-Community (NTNC) water systems that have ownership over all taps 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 [PRP due date]. Note: If not effective, installation of corrosion control treatment will still be required by date above. Contact your regulating agency staff (contact information at the end of this letter) by 11/05/2025 if interested in pursuing this option.

800 NE Oregon Street, #640, Portland, OR 97232 | Voice: 971-673-0405

Fax: 971-673-0694 | All relay calls accepted | www.healthoregon.org/dws

Note: You can postpone installation of corrosion control treatment if two consecutive 6-month lead and copper rounds are collected prior to installation and results are at or below both action levels. 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 the date listed above. Contact your regulating agency staff (contact information at the end of this letter) by 11/05/2025 to inform them of your interest in pursuing this option.

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 12/31/2025. 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@odhsoha.oregon.gov
- Mail the report to: Water Quality Reports
P.O. Box 14450
Portland, OR 97293-0450

The rules for controlling lead and copper are extensive and 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

Enclosure: Public notice template

Cc: Keith Male, DWS
Joel Ferguson, CLACKAMAS CO HEALTH DEPT

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