



October 17, 2022

DARRYL HENSLEY
JLR
PO BOX 588
WOODBURN, OR 97071

RE: Copper Action Level Exceedance at OR4194431

Dear DARRYL HENSLEY:

JLR recently exceeded the action level of 1.3 mg/L for copper. Due to the health effects associated with exposure to 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 11/28/2022;
- Two rounds of water quality parameters (WQPs) from each entry point by 11/28/2022;
- Lead and copper samples from each entry point by 3/31/2023;
- Written recommendation to comply with lead and copper rule by 3/31/2023;
- Submit plans for corrosion control treatment by 9/30/2024;
- Approved corrosion control treatment by 3/31/2025;

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 11/28/2022. [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 11/28/2022. [OAR 333-061-0036(10)(f)(E) and (F)]
3. Collect and submit no later than 3/31/2023 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)]

4. 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 3/31/2023. [OAR 333-061-0034(3)]
5. Submit the construction plans for the corrosion control treatment no later than 9/30/2024. 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)]
6. The approved corrosion control treatment must be installed no later than 3/31/2025. [OAR 333-061-0034(2)(b)(E)]
7. 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 10/10/2023. 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 11/28/2022 if interested in pursuing this option.

Note: Systems 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 11/28/2022 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 12/31/2022. 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@dhsosha.oregon.gov
- 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 Joshua Teamus at 541-968-9500 for assistance. Thank you for your prompt attention to these requirements.

Sincerely,
Oregon Health Authority, Drinking Water Services

Cc: Carrie Gentry, DWS
Joshua Teamus, DEPT OF AGRICULTURE