



April 24, 2023

DUSTIN THORSON
PAE LIVING BUILDING
620 SW 5TH AVENUE, SUITE 1100
PORTLAND, OR 97204

RE: Copper Action Level Exceedance at OR4195690

Dear DUSTIN THORSON:

PAE LIVING BUILDING 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 05/30/2023;
- Two rounds of water quality parameters (WQPs) before treatment from each active entry point by 05/30/2023;
- Lead and copper samples from each active entry point after treatment by 12/31/2023;
- Collect WQP and demonstration tap samples in the next two 6-month monitoring periods reported by 01/10/2024 and 07/10/2024 respectively

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 05/30/2023. [OAR 333-061-0036(10)(f)(E) and (F)]
2. Collect two rounds of source water quality parameters (WQP) before treatment from each active 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 05/30/2023. [OAR 333-061-0036(10)(f)(E) and (F)]
3. Collect and submit no later than 12/31/2023 a lead and copper sample from each active entry point after treatment. These results are needed as soon as possible to ensure proper treatment is occurring. [OAR 333-061-0036(10)(g)(A)]

4. Conduct two additional 6-month rounds of lead and copper tap monitoring at 5 sample sites. The first round must be collected between 7/1/2023 and 12/31/2023 and the results reported to DWS by 1/10/2024. The second round must be collected between 1/1/2024 and 6/30/2024 and reported to DWS by 7/10/2024.
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 1/10/2024 and the second two rounds must be reported to DWS by 7/10/2024.
6. 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 07/10/2024. Note: If not effective, alteration of the corrosion control treatment would be required. Contact your regulating agency staff (contact information at the end of this letter) by 05/30/2023 if interested 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 9/30/2023. 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 14350

Portland, OR 97293-0350

The Lead and Copper Rule is extensive and can be complicated. Please contact Carrie Gentry at 971-201-9764 for assistance. Thank you for your prompt attention to these requirements.

Sincerely,
Oregon Health Authority, Drinking Water Services

Cc: Carrie Gentry, DWS