## **Public Health Division**

## Center for Health Protection, Drinking Water Services



Tina Kotek, Governor

December 17, 2025

Jeanne Snow Canby Regency MHP 10038 S New Era Road Canby, OR 97013

Re: Chemical Change - Corrosion Control Treatment (PR#153-2022)
Canby Regency (PWS ID#00163)
Conditional Approval

Dear Jeanne:

Thank you for your submittal to the Oregon Health Authority's Drinking Water Services (DWS) of plan review information for the Corrosion Control Treatment Change for Canby Regency. On December 15, 2025, our office received a plan review request with water quality data and a plan review fee of \$248.

The project includes changing from soda ash to caustic soda using the existing corrosion control infrastructure. The existing soda ash treatment provided inconsistent pH levels that did not meet the minimum required level. The initial target pH for corrosion control is 7.2.

The plans are approved subject to the following conditions:

 All chemicals in contact with potable water must meet NSF Standard 60. Please submit documentation showing that the 25% caustic soda solution is NSF Standard 60 certified.

In addition, I have the following comments/recommendations:

• The written Operation & Maintenance Manual must be updated with the change to caustic soda and any procedural changes associated with that chemical change.

Until we receive verification that the conditions have been met and final approval has been issued, the corrosion control treatment is not approved for use. Upon completion of the project, the engineer must verify in writing that construction was completed according to the submitted plans. If substantial changes are made, a set of

as-built drawings must be submitted. Documentation demonstrating how the above conditions were met should reference Plan Review #155-2025 and can be emailed to me at <a href="mailto:keith.male@oha.oregon.gov">keith.male@oha.oregon.gov</a>.

In addition to the above condition, note that the change in corrosion control treatment will require:

- Increased sampling for water quality parameters (pH and alkalinity) will need to be sampled at both the entry point and in the distribution system (i.e., other locations throughout the facility).
- The system must conduct lead and copper tap monitoring during two consecutive six-month periods no later than 12 months after the deadline for installing treatment. During each six-month period, 10 samples are required.
- Both water quality parameter measurements and lead and copper tap monitoring must be conducted within the same two-week period so that DWS can evaluate the effectiveness of the corrosion control treatment.
- Once this increased monitoring is complete, a minimum pH will be established for both the entry point and distribution system.
- Sampling for pH will be ongoing and needs to be reported monthly.
- Reductions in lead and copper tap sampling is also possible, depending upon the results of the increased demonstration testing rounds.

If you have any questions, please feel free to email me at <a href="keith.male@oha.oregon.gov">keith.male@oha.oregon.gov</a> or call me at 503-939-1322.

Sincerely,

Keith Male, PE Regional Engineer

**Drinking Water Services** 

cc: Julie Wray, DWS

Joel Ferguson, REHS, Clackamas County Health Department Phillip Merril, Contract Operator Lynelle Davis, Regency of Georgia, Inc.