

Tina Kotek, Governor

November 19, 2024

Adam Loveless (adam@affordablehousingsource.com)

Spar Tree MHP
26052 SE Eagle Creek Rd
Eagle Creek, OR 97022

Sent by email only.

Re: Corrosion Control – PR#129-2023
Spar Tree MHP – PWS # 01264
Final Approval

Dear Adam:

On November 18, 2024, our office received confirmation that the above project was completed according to the plans submitted and conditions set forth in the May 28, 2024 conditional approval letter.

This verification completes the plan review requirements. Final approval is issued at this time, and the corrosion control injection system using soda ash is approved for use.

Note:

- 1) To demonstrate the corrosion control treatment is effective, the water quality parameters and two 6-month lead and copper tap demonstration rounds of sampling will need to be completed as described on the following page.
- 2) Once this “demonstration sampling” is completed, OHA/DWS (Keith Male) will establish a minimum entry point and distribution system pH for the water system that will have to be measured and met on an ongoing basis.
- 3) A reduction in lead and copper tap sampling may be possible based on the results of either the first two 6-month demonstration rounds of sampling or subsequent 6-month demonstration rounds, depending upon results as sampling progresses

Water quality parameter sampling and two 6-month demonstration rounds of lead and copper tap sampling will need to be completed as follows:

1) Water Quality Parameter Monitoring (pH and alkalinity)

pH and alkalinity will need to be sampled as follows:

- a. **Test method:** pH needs to be measured using a calibratable pH probe that compensates for water temperature. Alkalinity may be measured on-site using an approved test method (the unit you submitted/purchased). Alkalinity may also be sent to an ORELAP approved lab such as the lab used for coliform or nitrate sampling.
- b. **Entry point sampling (every 14 days)** – Sample the entry point (post treatment) every 14 days for pH on an on-going basis.
- c. **Distribution sampling (2 sets w/each lead and copper tap sampling event)** – Take 2 sets of pH and alkalinity samples from 1 location in the distribution system (e.g., a coliform sample site) at the same time as lead and copper tap sampling (e.g., every 6-months during demonstration rounds and with lead and copper tap sampling every 1- or 3-years as required on an on-going basis).

The sets should be spaced 2 weeks apart (e.g., sample the first set when the first lead and copper tap sample is pulled and the second set 2 weeks later).

2) Lead and copper tap sampling (5 tap sample sites)

Complete two rounds of lead and copper tap sampling at 5 sample sites (along with the sets of distribution pH and alkalinity described above) as follows:

- a. **1st round** – to be completed prior to June 30, 2025
- b. **2nd round** – to be completed between July 1st and December 31, 2025.

The data table (**Table 1**) on the following page may be used help track the demonstration round sampling. **Templates for required consumer notification** of lead and copper tap sample results are online at the links below:

- **Consumer Notification Templates for Community Systems (C)**
- When samples **exceed** lead AL at C: [Fillable MS Word](#)



- When samples are **below** lead AL at C:  [Fillable MS Word](#)
- **Certification Form:** Submit to DWS when consumer notification has been completed:
 [Fillable MS Word](#)

Table 1. Required sampling to demonstrate compliance following Final Approval

What Parameter	Where	When	Purpose	Enter 90 th percentile lead and copper and individual pH and alkalinity sample dates and results		
Lead and Copper (Round 1)	5 tap sample sites	Round 1 – within 2 months of Final Approval	Demonstrate corrosion control	Round 1 Date: _____ Lead = _____ mg/l Copper = _____ mg/l		
Lead and Copper (Round 2)	5 tap sample sites	Round 2 – 6 months after round 1 sampling	Demonstrate corrosion control	Round 2 Date: _____ Lead = _____ mg/l Copper = _____ mg/l		
pH & Alkalinity (EP-A)	Entry Point A or “EP-A” (prior to first useable tap).	Every 14 days following Final Approval	Results along with lead and copper tap sampling will be used to establish a minimum pH that will have to be maintained at the entry point	EP-A Results		
				Date	pH	Alk
pH & Alkalinity (DIST-A)	Distribution system – select either 1 lead or copper tap sample site or 1 coliform sample site representative of the water quality in distribution system in the school	Take 1st sample on the day of each round of lead and copper tap sampling. Take a 2nd sample – within 14 days of the 1 st sample.	Results along with lead and copper tap sampling will be used to establish a minimum pH that will have to be maintained in the distribution system. Taken with lead and copper rounds 1 & 2:			
				(26 results needed)		
				Distribution Results		
				Date pH Alk		

	(document the sample site “e.g., Unit #14”		Taken w/Round 1 =>			
			14 days later =>			
			Taken w/Round 2 =>			
			14 days later =>			

Table 2. Sampling anticipated following the demonstration sampling in Table 1

What Parameter	Where	When	Purpose	Results
Lead and Copper	5 tap sample locations	Every 1 or 3 years (depending upon results of 6-month demonstration rounds)	Reduced Monitoring	Year 1 Sample Date: _____ Lead = ____ppb Copper = ____mg/l
				Year 2 Sample Date: _____ Lead = ____ppb Copper = ____mg/l
				Year 3 Sample Date: _____ Lead = ____ppb Copper = ____mg/l
pH at EP-A	Same site as EP-A pH sampling in Table 1	Every 14 days (on-going requirement)	Results must be above the required minimum pH	Report the results by the 10 th of the following month every month using the “Entry Point” form (provided later)
pH in the Distribution system	Same site as DIST-A pH sampling in Table 1	1 st sample during lead and copper tap sampling and 2 nd sample within 14 days of 1 st sample	Results must be above the required minimum distribution pH	Report results by the 10 th of the following month using the “Distribution” form (provided later)

Minimum Water pH requirements and reported pH results will be viewable online here:

<https://yourwater.oregon.gov/lcr.php?pwsno=01264>

Lead and copper 90th percentile results are viewable online here:

<https://yourwater.oregon.gov/leadcopper.php?pwsno=01264>

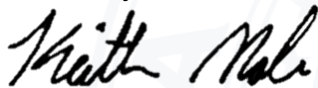
Once minimum water quality parameters are established, you will begin reduced monitoring (or routine monitoring, depending upon results) using new monthly reporting forms (due in our office by the 10th of each month).

However, if you would like to use these forms during demonstration rounds, they are available on our website at the links below:

- Reporting Form for Water System Entry Point [Fillable MS Word](#) or [PDF](#)
- Reporting Form for Water System Distribution [Fillable MS Word](#) or [PDF](#)
- [Monitoring and Reporting Form Instructions](#)

If you have any questions, please feel free to email me at keith.male@oha.oregon.gov 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