

November 1, 2024

Shanna Myers, PE  
Professional Engineer  
Conсор Engineers, LLC  
Via email: shanna.myers@consoreng.com

**Re: Corrosion Control Installation (PR#133-2024)  
JLR (PWS ID#94431)  
Conditional Approval**

Dear Shanna:

Thank you for your submittal to the Oregon Health Authority's Drinking Water Services (DWS) of plan review information for the corrosion control project for JLR. On September 30, 2024, our office received a project diagram, plans and specs, and sample results. A plan review fee of \$825 was received on September 27, 2024. A Corrosion Control Assessment memo was submitted in March 2023.

The project includes installation of sodium hydroxide and associated equipment for the purpose of corrosion control. The water system exceeded the copper action level in September 2022.

Based on the water quality parameters, EPA's guidance indicates that orthophosphate is the recommended treatment method. Due to potential phosphate limits, the water system is opting to raise the pH using sodium hydroxide. This approach is acceptable to DWS as long as the results from sampling post-installation of treatment are below the action level. If the water system still exceeds the action level for copper despite the increase in pH, then DWS may require installation of orthophosphate.

According to the March 2023 memo, the water system intends to increase the entry point pH to 8.0 for six months and then sample to determine if adjustments must be made. Additional sampling requirements are noted on the second page of this letter.

**The plans are approved with the following condition:**

- The water system's operation and maintenance manual must be updated to include

the operation and maintenance of the sodium hydroxide equipment.

**Until we receive verification that the conditions have been met and final approval has been issued, the facility 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 condition was met should reference Plan Review #133-2024 and can be emailed to me at [Carrie.L.Gentry@oha.oregon.gov](mailto:Carrie.L.Gentry@oha.oregon.gov)

In addition to the above condition, note that following installation of the equipment and DWS issuing final approval of this project:

- 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).
- Two demonstration rounds of lead and copper tap samples at 10 sites will also be needed in the first 12 months following construction and final approval.
- 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 call me at (971) 201-9794.

Sincerely,



Carrie Gentry, PE  
Regional Engineer  
OHA-Drinking Water Services  
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cc: Joshua Teamus, REHS, Oregon Department of Agriculture  
Sarah Schwab, REHS, Oregon Department of Agriculture  
Darryl Hensley, JLR, [dhensley@brucepac.com](mailto:dhensley@brucepac.com)