



February 8, 2016

Carl Patenode
City of Drain
P.O. Box 158
Drain, OR 97435

Re: **Compliance with Lead and Copper Rule
City of Drain (PWS #00260)**

Dear Carl Patenode:

As you are aware, the City of Drain PWS #4100260 exceeded the lead action level during sampling conducted August 27, 2015 – September 17, 2015. Unfortunately, the 90th percentile result of the 10 samples was 0.0224 mg/L for lead. The lead action level as set by the Environmental Protection Agency is 0.0155 mg/L (copper is 1.35 mg/L). In order for the City of Drain to comply with the Lead and Copper Rule, the following must be completed:

1. Oregon Administrative Rules (OAR) 333-061-0034(5) requires the water system to deliver public education materials to their customers within 60 days of being notified by the laboratory that the lead action level was exceeded.
2. OAR 333-061-0034(5)(e) requires the water system to provide a notice of individual lead tap results to the occupants of the residences where the tap was tested, including those who do not receive water bills, within 30 days after the system learns of the tap monitoring results. This notice should also include an explanation of the health effects of lead, list steps consumers can take to reduce exposure to lead in drinking water, contact information for the water utility, the maximum contaminant level goal and the action level for lead and the definitions for these two terms.
3. OAR 333-061-0036(2)(c)(F) requires the water system to collect two rounds of water quality parameter (WQP) testing including pH, alkalinity, calcium, conductivity, and water temperature. Each round of WQP testing should be collected from two locations within the distribution system and at the entry point to the distribution. The first round should be conducted right away and the second round should be conducted 2 weeks from the first round. The two samples within the distribution must be representative of water quality throughout the distribution, such as at sites on your

coliform sampling plan. I recommend you also sample raw water alkalinity.

4. OAR 333-061-0036(2)(c)(G) requires the water system to collect one lead and copper sample at the entry point to the distribution system. This sample should be flushed long enough so that you are capturing source water.
5. OAR 333-061-0034(3) requires the water system to provide a written recommendation to me identifying the approach the system will pursue to meet the intent of the Lead and Copper Rule. The letter must include a plan for the installation of one or more corrosion control treatments, or the modification of the existing corrosion control treatment, which the system believes constitutes optimal corrosion control for the system. The letter must be based on a desk top evaluation, corrosion control study, WQP test results, analogous water systems, etc. If you wish, you can use the WQP test results with the attached EPA Revised Guidance Manual for Selecting Lead and Copper Control Strategies and/or you can ask the circuit rider program, HBH Engineers, for assistance. I can also assist you with the Guidance Manual once you conduct your WQP testing. The letter of recommendation must be submitted to me within 6 months of exceeding the lead action level, which is March 17, 2016 and I will use the WQP results and the above guidance manual to review it.
6. OAR 333-061-0034(2)(b)(E) requires the water system to have the appropriate corrosion control treatment installed within 24 months after the OHA Drinking Water Services (DWS) specifies optimal corrosion control treatment.
7. After I approve the treatment approach, we will begin the plan review process before any changes are made to the system.

The Lead and Copper Rule is extensive and can be complicated. If you have any questions or concerns, or would like this report in an alternate format, please contact me at (541) 726-2587 x29 or by email at rebecca.a.templin@state.or.us. Your cooperation is appreciated.

Sincerely,



Rebecca Templin, P.E.
Regional Engineer

cc: Julie Wray, DWS Portland