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February 17, 2016

Mt Angel Abbey Water System
Attention Tom Reasoner
1 Abby Drive
St Benedictine, OR 97373

Dear Mr. Reasoner,

This is your last notice before formal enforcement of the Lead-Cooper Rule concerning Mt Angel Abby, Public Water System # 4190170.

Please respond to this letter in writing by March 17, 2016 with a proposed schedule for completing each task.

I wrote you a letter in January of 2015 concerning your Lead/Cooper testing done in 2013 for the water system known as Mt Angel Abby, Public Water System # 4190170. As you recall, four out of the five samples exceeded the maximum contamination level for lead. The system was notified the samples were elevated and the system was asked to request the initial samples be invalidated and new samples be submitted.

We have never received the request for invalidation to date, even though new samples were taken. I urged you to respond but unfortunately that didn't happen. In the letter dated January 26, 2015 I stated the actions that would be imposed on the system and will repeat it again here.

Since there was no formal request for invalidation, the Oregon Health Authority (OHA) Drinking Water Division will not accept the second set of samples taken October 9, 2013. Furthermore, OHA has changed your Lead and Copper testing.



Your current schedule for Lead and Copper starting January 2015 was as follows:

10 samples from the distribution system at six month intervals, this has been adjusted to extend for the next twelve months in 2016.

Please sample immediately and the second round will be in six months from the first.

If the request for invalidation had been received there would have been no further action than the simple resampling, which is no longer an option.

Therefore, the system is now required to also do the following:

1. Two rounds (one right away and one two weeks later) of water quality parameter testing (pH, alkalinity, and calcium, conductivity, and water temperature) from the treated sample tap at the well and at one location in the distribution system (such as a routine coliform sampling location). A calibratable, temperature-compensating, electrode-type pH meter must be used and calibrated before each reading. The pH must be done in the field since the pH is the measure of corrosiveness of the water.
2. Collect a Lead & Cooper sample directly from the well.
3. Since your system is a Community Water System and you must deliver a consumer notice of individual lead tap results to the occupants of the residences where the taps were tested. See OAR 333-061-0034(5)(e) for required content. Notice is due to the public within 30 days of being notified of an exceedance. A final copy of the notice, and a certification that the notice was distributed as required by the above OAR, is due to the county three months following the end of the monitoring period. *Note that the consumer notice is a requirement regardless of whether the lead and/or copper action levels were exceeded or not.*
4. Since the lead action level at the 90th percentile has been exceeded, Public Education (PE) must be disseminated to all customers, including notification that any customer who wants to have their water tested by a lab

can (although, the water system isn't required to collect and analyze the sample itself or pay for collecting or analyzing it).

<http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/Operations/Documents/publicnotices/LeadPubEdRequirements CW.doc> PE is due to the public within 60 days after the end of the monitoring period in which the exceedance occurred, but a copy must be submitted to the county for review before being delivered to customers. A final copy of the PE, and a certification that the PE was distributed as required by the above OAR, is due to the county three months following the end of the monitoring period. Public Education must be repeated yearly as long as the action level is exceeded at the 90th percentile.

5. Mt Angel Abbey must include the following information beginning immediately on or in each water bill as long as the action level is exceeded: *Mt. Angel Abby Water System found high levels of lead in drinking water in some homes. Lead can cause serious health problems. For more information please call {INSERT WATER SYSTEM CONTACT and PHONE NUMBER}.*

6. Mt Angel Abbey must report the following in their Consumer Confidence Report (CCR): the 90th percentile value of the most recent round of sampling, the number of sampling sites exceeding the action level, and the lead-specific information in OAR 333-061-0043(4)(c). *Note that the lead-specific information is required in all CCRs regardless of whether the lead and/or copper action levels were exceeded or not.*

7. OAR 333-061-0034(3) requires the water system to provide a written recommendation to Marion County identifying the approach the system will pursue to meet the requirements of the Lead and Copper Rule. Specifically, the written recommendation must identify the corrosion control treatment which the system believes constitutes optimal corrosion control for the system and include a plan for the installation of this treatment. The recommendation must be based on WQP test results, a desk top evaluation, a corrosion control study, or on analogous water systems, etc. You can determine the optimal corrosion control for your system using the WQP test results and the *EPA Revised Guidance Manual for Selecting Lead and Copper Control Strategies* or if you wish, you can ask the circuit rider, HBH Engineers, for assistance (this is what I recommended). The letter of recommendation must be submitted within 6 months of the end of the monitoring period in which the lead action level was exceeded.

8. OAR 333-061-0034(2)(b)(E) requires the water system have the appropriate corrosion control treatment installed within **24 months** after OHA-DWS approves your recommended optimal corrosion control treatment.

9. After OHA-DWS approves the treatment approach, Mt Angel Abbey must submit plans to OHA-DWS for review and approval before any corrosion control treatment is added to the system. Note: A plan review fee will be required.

Per OAR 333-061-0034(2)(e), systems can postpone installation of corrosion control treatment if the action levels for both lead and copper are met after two 6-month rounds at the standard number of monitoring locations which for Mt Angel Abbey is 10 sites. The first 10 samples should be collected sometime between January 1 and June 30, 2016 and the next set should be collected roughly 6 months after the first set and sometime between July 1 and December 31, 2016. If the action level for lead or copper is exceeded during either of these 6-month rounds, the system must recommence the corrosion control treatment installation process beginning where they left off.

Please understand Mt Angel Abbey cannot postpone the activities and deadline outlined in steps 1 through 7 above; these steps must be taken concurrently while the two 6-month rounds of lead and copper testing are completed.

Please feel free to call with any questions, 503-588-5126.

Sincerely,

A handwritten signature in black ink that reads "Carolyn Stegall REHS". The signature is written in a cursive style with a large initial 'C'.

Carolyn Stegall, REHS

CC. Brad K Daniels,
Enforcement and Rules Coordinator Oregon Drinking water Program