



September 12, 2014

Eddyville Charter School  
ATTN: Dennis Schultz, Principal  
#1 Eddyville School Road  
Eddyville, OR 97343

RE: Compliance with the Lead and Copper Rule at the Eddyville Charter School  
Public Water System (PWS #41-92040)

Dear Mr. Schultz:

As you are aware, the Eddyville School's sampling results for lead and copper have exceeded the action levels during sampling on several occasions, as displayed in bold below. The action level set by the Environmental Protection Agency for lead is 0.0155 mg/L; copper is 1.35 mg/L. The school has been out of compliance with these drinking water standards for years.

Action Levels: Lead = 0.0155 mg/l Copper = 1.35 mg/l

**Lead and Copper 90th Percentile Summary Results**

Sample Date	Date Received	Sample Count	Duration	Lead (mg/l)	Copper (mg/l)
Mar 12, 2014 - Mar 12, 2014	Mar 21, 2014	12	6M	<b>0.0314</b>	<b>1.4000</b>
Aug 06, 2013 - Aug 06, 2013	Aug 19, 2013	19	6M	<b>0.0191</b>	0.7700
Feb 26, 2013 - Mar 04, 2013	Mar 08, 2013	10	6M	<b>0.0231</b>	0.9600
Sep 21, 2011 - Sep 21, 2011	Oct 12, 2011	5	3Y	<b>0.0216</b>	1.1550
Jun 17, 2008 - Jun 17, 2008	Jul 02, 2007	5	3Y	0.0000	0.0000
Sep 23, 2004 - Sep 23, 2004	Oct 26, 2004	5	3Y	0.0035	0.4800
Jan 01, 2001 - Feb 07, 2001	Apr 02, 2001	5	YR	0.0057	0.0650
Jul 01, 2000 - Jul 19, 2000	Aug 30, 2000	10	6M	0.0035	0.1070
Jan 01, 2000 - Jan 05, 2000	Jan 27, 2000	10	6M	<b>0.0569</b>	<b>2.4000</b>
Jan 01, 1999 - Mar 03, 1999	Mar 29, 1999	5	YR	<b>0.0278</b>	<b>1.5900</b>
Jul 01, 1998 - Jul 24, 1998	Oct 05, 1998	10	6M	0.0052	0.0930
Jul 01, 1994 - Nov 15, 1994	Dec 05, 1994	10	6M	<b>0.0450</b>	<b>1.4800</b>

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In order for the Eddyville Charter School to comply with the Lead and Copper Rule, the following must be completed:

1. Oregon Administrative Rules (OAR) 333-061-0034(5) requires that the water system deliver public education materials to their customers within 60 days of being notified by the laboratory that the action level has been exceeded. Our records show that these materials were issued to the public in July 2013, but they must be re-issued if the lead level remains out of compliance. The water system is now overdue in re-issuing the public education notice. I provided those requirements and the EPA template materials for this notice to Landon Lightle in July, 2014. If these public education materials have been redistributed, please provide Drinking Water Services (DWS) with a copy, as required.
2. With the assistance of the state's Circuit Rider HBH, water quality parameter testing was conducted in November 2012 (as required per OAR 333-061-0036(2)(d)(F)). Following the analysis of those results, HBH recommended in a 12/11/12 memo that the school install corrosion control treatment consisting of: a) caustic soda to raise the water's pH, and b) adding blended phosphates to sequester metals. The water's natural pH at the school is quite low. Caustic soda is needed to raise the pH enough so that the blended phosphates can be effective at sequestering the metals in the lines. The recommended treatment will also protect the students in case an occasional upset in the distribution system again allows water to shift over from the old, "undeleted" plumbing lines. HBH's 2012 recommendation provided a preliminary list of the equipment needed and budget for the recommended treatment.
3. OAR 333-061-0034(3) requires that the water system provide a written recommendation identifying the approach the system will pursue to meet the intent of the Lead and Copper Rule. In 2013, the school pursued plumbing replacement as a means to reduce the lead and copper in the drinking water (per the Lead Contamination Control Act, LCCA). Subsequent testing results, however, continued to exceed the action levels for lead and copper.


The water system's letter of recommendation is due no later than six months after the end of the last lead and copper monitoring period, so that would be December 31, 2014. The letter must include a plan and timeline for the installation of one or more corrosion control treatments which the system believes will constitute optimal corrosion control for the system. The school's plan must be based on a desk top evaluation, corrosion control

study, WQP test results, analogous water systems, etc. The school may base its plan on the HBH corrosion control study and recommendations.

4. After DWS approves the intended treatment approach, contact Julie Wray in Portland at (971) 673-0408 or [dws.planreview@state.or.us](mailto:dws.planreview@state.or.us) to begin the plan review process before any changes are made to the system. Rather than the generic one, the DWS engineers are developing a version of Plan Review instructions just for the addition of corrosion control treatment; I have enclosed that draft handout which should be very helpful, though you should be aware it is only draft.
5. OAR 333-061-0034(2)(b)(E) requires the water system to have the appropriate corrosion control treatment installed within 24 months after OHA Drinking Water Services approves optimal corrosion control treatment.

The Lead and Copper Rule is extensive and can be complicated. Please don't hesitate to contact me for assistance or with questions at (541) 726-2587 ext. 30 or email [betsy.l.parry@state.or.us](mailto:betsy.l.parry@state.or.us). Thank you for your continued cooperation.

Sincerely,

  
Betsy Parry, R.E.H.S.  
Drinking Water Services  
Oregon Health Authority

Enclosures –

Plan Review Instructions for adding Corrosion Control Treatment at Public Water Systems (Draft)

CC: Landon Lightle, Eddyville Charter School  
**OHA Drinking Water Services, Portland Office**  
Casey Lyon, Springfield DWS Office  
Amy Chapman, Lincoln County  
Rob Henry, HBH Engineering