



Benton County Health Department

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Person-Centered Behavioral & Physical Health Care Public Health & Prevention Regulatory and Population Health Health Management Services

October 4, 2012

Kim Patten
Corvallis School District 509 J
P.O. Box 3509J
Corvallis, Oregon 97339

RE: Nitrate MCL (Maximum Contaminate Level) violation for Fairplay Elementary dba Corvallis Waldorf School

Kim,

Thank you for meeting with me September 24, 2012 to discuss the Nitrate MCL violation that occurred at Fairplay Elementary. The original quarterly sample taken on September 14, 2012 was 11.5 ppm. The confirmation sample taken on September 18, 2012 was 10.8 ppm. The average of these two samples is 11.1 ppm. The MCL level for Nitrate is 10.0 ppm. As you are aware, this water system has tested for levels above 50% of the MCL for years and has been on a quarterly testing schedule from as early as 1985. The water system has never officially broken the MCL until now. Here is a review of our discussion for remediation of nitrates at Fairplay Elementary:

1. You were required to submit a public notice for the MCL violation. Your notice was reviewed, approved and sent to Oregon Health Authority Drinking Water Program on September 21, 2012. You stated that correspondence with parents was through e-mail and that the notice was also posted at the school. Thank you for completing this in a timely manner. We confirmed that drinking water fountains have been removed for some time and that bottled water for drinking is provided. Quarterly sampling for nitrates will need to continue until remediation is completed.
2. You stated that the school has been sold to the Corvallis Waldorf School and that the sale will be finalized on June 30, 2013. We discussed the urgency to complete remediation for nitrate as well as the ongoing lead and copper issue. Some plumbing fixture replacement has occurred for the lead and copper issue. Orthophosphate is injected to control pipe corrosion and has been occurring for years. The school district must submit two six month samples rounds with results below the action level of .015 ppm lead and 1.35 ppm copper. Once this occurs, a future sampling schedule will be determined for lead and copper testing based on those results. We discussed having this complete prior to the sale.
3. We discussed possible remediation methods to reduce Nitrate levels:
 - Drilling a new source that tested for reduced or no detectable levels of nitrates.
 - The possibility of drilling a new source that tested for reduced levels of nitrates and blending that water with the existing source.
 - As a temporary measure, blending from a secondary storage tank with water from another approved source that had no detectable levels of nitrates.

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- Drilling the existing source into a deeper aquifer if a geologist determined one exists and was tested to have reduced or no detectable nitrate levels.

You stated that none these options made good business sense for the school district due to the sale of the property.

4. We discussed the option of utilizing the Circuit Rider Program to provide insight on methods of remediation. We reviewed installing a Reverse Osmosis Unit. A unit was removed from Inavale Elementary School in 2011 that belongs to the Corvallis 509 J School District. The system is in storage and available. This would need to be done so it would not interfere with the orthophosphate injection that is used for controlling pipe corrosion for the lead and copper issue. This installation would need to be reviewed and approved by the Drinking Water Program. The plan review process could begin for the installation RO unit without utilizing the circuit rider program.
5. You agreed to have a corrective action plan in place within the next 90 days which would be on or about the first week of January 2013. You agreed to have the remediation completed before the sale of the property on June 30, 2013.
6. Paul Jennison is the staff person designated as having direct responsible charge of the water system. Paul is on vacation for the next four weeks. You stated that you and Tim Truitt will begin preliminary steps in Paul's absence.

Thank you for efforts to mitigate these water related health issues.

Sincerely,



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Drinking Water Program
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Cc: Oregon Health Authority Drinking Water Program
Betsy Parry DWP Region 2 Springfield office