



West Linn – Wilsonville Schools

To: Tim Woodley, Director of Operations May 4, 2017
From: Pat McGough, Facilities Manager
Subject: Drinking Water Lead and Copper Testing Plan and Protocols

In April 2016, the Governor directed the Oregon Health Authority (OHA) and the Oregon Department of Education (ODE) to review existing programs for reducing student exposure to lead in drinking water and create a plan to address the problem of lead in school water. Currently, no law requires school districts to perform testing for lead on municipal-supplied water systems, however, the plan has recommended that all districts develop protocols for testing and report test records to OHA. The District will follow this recommendation and will implement protocols to meet this request. While no Administrative Rules currently exist, OAR 333-061-0036 governs Sampling and Analytical Requirements for public water systems and will be used for guidance in developing these testing protocols for the District. The District currently is governed by these rules for lead and copper testing at sites where drinking water is supplied by wells: Athey Creek Middle School, Stafford Primary School and the Administration Building. These sites will be tested in the same manner as municipal-supplied sites. Separate well lead and copper testing protocols for public water systems will adhere to OAR 333-061-0036 requirements.

Sites to be tested:

All schools will be tested for elevated levels of lead and copper. All site locations (taps) within each school where water can be drawn for consumption will be tested. These include sinks, bubblers (drinking fixtures usually attached to classroom sinks), drinking fountains and bottle filling stations. Taps that will not be tested include multi-station (Bradley) hand washing sinks for restrooms, exterior hose bibs and custodial closets.

Testing Protocols:

All samples will be taken as “first draw”. Following EPA recommendations, first draw is defined as samples taken for lead and copper that shall have stood motionless in the plumbing system of each sampling site/tap between 8-18 hours. All plumbing lines will be flushed at least eight hours before and no more than 18 hours the day prior to the sampling date. Sample bottles will be 250 ml in size and will be provided by an OHA-accredited drinking water laboratory. Samples submitted to laboratories for analysis shall be clearly identified and shall include the name of the water system (school site), sampling date and time, sample location identifying the sample tap, the name of the person collecting the sample and be labeled as special samples. Samples will be drawn by trained District personnel and immediately



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delivered to the OHA-accredited drinking water laboratory. A “Chain of Custody” record sheet must accompany all test samples with appropriate signatures. Testing information will be recorded for reporting.

Action Level:

The U.S. EPA "3 T's Revised Technical Guidance" mandates removal of access to water taps at 20 parts per billion (ppb). The District will use the EPA action limit of 20 ppb as the threshold.

Reporting:

Once samples are collected and analyzed, the OHA-accredited drinking water laboratory will forward the results to the District Operations Department. Reports will be sent to the OHA Drinking Water Services. Test results that exceed the action level for lead or copper will also be sent to the Clackamas County Public Health Department. Test results will be available on the District website.

Mitigation:

Should any test result exceed the Action Limit for Lead (0.02 mg/L-20 ppb) or Copper (1.35 mg/L), District personnel will immediately turn off the water to the fixture. A second sample may be drawn to confirm laboratory results. The EPA recommendation for second samples allows the fixture to be run for 30 seconds prior to collection. Should the second test results confirm elevated levels of lead or copper, replacement of the fixture is warranted. Any test site location/tap will be immediately replaced and retested. Retesting will follow the same protocols specified above. A notification letter to the school staff and community will be sent as soon as results are verified. Bottled water will be supplied if necessary. Should this response fail to reduce the levels below the action level of 20 ppb, the specific fixture will be permanently removed until a complete plumbing replacement project can eliminate the source.

Retesting:

The District will retest all site locations (taps) within each school where water can be drawn for consumption every five (5) years. Each fiscal year, 20% of taps in the District will be tested. Performed annually, this cycle will ensure that every tap is tested within a five-year period.