

LEAD-IN-WATER RETEST REPORT

March 4th, 2023

EIS Job No. 2022080

Prepared For:

**Reedsport School District
C/O Michael Schoppe
100 Ranch Rd.
Reedsport, OR 97467
Douglas County**

Prepared By:

**Environmental Inspection Services
Matthew C. Spear, Environmental Professional
430 N First St.
Carlton, OR 97111
Cell: (503) 944-9818
E-mail: charles_a_spear@yahoo.com**



Bus: 503.678.5063 | Cell: 503.680.6398

11981 Fargo Road, NE, Aurora, OR 97002

www.environmentalinspectionsservices.net



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1.0 EXECUTIVE SUMMARY

Lead-in-Water Retest Report

March 4th, 2023

Sampling Location(s):

(Reedsport District Office)
100 Ranch Rd.
Reedsport, OR 97467
Douglas County

(Highland Elementary School)
2605 Longwood Dr.
Reedsport, OR 97467
Douglas County

(Reedsport Community Charter School)
2260 Longwood Dr.
Reedsport, OR 97467
Douglas County

Reedsport School District
C/O Michael Schoppe

Dear Mr. Michael Schoppe,

Environmental Inspection Services conducted a comprehensive lead-in-water retest episode at the subject Reedsport School District (RSD) buildings on Friday, February 17th, 2023. The drinking water samples were received by Alexin Analytical Laboratory on Monday, February 20th, 2023, and analytical test results were reported to EIS on Friday, March 3rd. Twelve elevated-lead in-drinking water considerations were noted for the initial tested faucets and fountains of the subject building. No elevated levels were found at any faucets during this retest with a 30-second flush time.

The EPA Maximum Contaminant Limit (MCL) for lead in public drinking water Systems is 15 parts per billion (ppb). The EPA action limit of 15 parts per billion (ppb) was utilized as the action limit for this water sampling and retesting episode. This retest of the drinking water at potential points of consumption episode was conducted immediately following a 30-second flush, per step 2 of module 5 of EPAs "3Ts for Reducing Lead in Drinking Water in Schools and Childcare Facilities".

Sample NO.	Location	Lead Concentration (PPB)
20010000 – 001BF22B	Men bathroom by entry	1
20010000 – 003SF22B	Staff room by mech room	2
20010000 – 006SF22B	Work room in Head Start	2
20010000 – 013KF22B	Head start kitchen under window (see map)	1 (recommended to replace, not required)
20010200 - 020BF22B	Staff bathroom by kitchen	5
20010200 – 050CF22B	Classroom 22	2
20010200 – 059CF22B	Classroom 17	4
20010200 - 073CF22B	Classroom 29	7
20010100 - 084BF22B	Bathroom Under Stage	3
20010100 - 097BF22B	Girls Locker Bathroom	2
20010100 - 103DW22B	Team Room	N/A (Disconnected)
20010100 - 113CF22B	Classroom (See Map)	ND

A unique sample location code was assigned for each drinking water outlet sample. The attached alphanumeric sequence code was assigned for each sample. Example - the sampling code for sample No. 003 was as follows:
 19000000-003BF22B - (A Water sample collected from district 1900, Building No. 0000, sample No. 098, bathroom faucet (BF), the year 2022, re-test: B.)

In the opinion of EIS, we recommend that all fixtures that were initially tested over the 15-ppb action limit be replaced or immediately disconnected, despite the favorable retested results. Thank you for this opportunity to be of service. If there are questions concerning the lead-in-water analytical test results, contact EIS at (503) 680-6398.

Respectfully submitted,
 Matthew C. Spear
 Environmental Professional



APPENDIXES

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APPENDIX 1.0

LEAD ANALYTICAL TEST RESULTS



**Professional
Laboratory
Services**

13035 SW Pacific Hwy
Tigard, OR 97223
Tel.: (503) 639-9311 Fax: (503) 684-1588

ANALYSIS REPORT

Reported: 03/03/2023
Received: 02/21/2023
Sampled By: Matthew C. Spear
Work Order: 3052022

**C
L
I
E
N
T**
Environmental Inspection Services
Attn: Matthew Spear
430 N. 1st Street
Carlton OR, 97111
Phone: (503) 680-6398

Project: RSD LIW Retest
Project # : -
Sample Type : Grab

Sampling Location: Reedsport District Office

Lab Number

	Code	Method	Result	Units	MRL	EPA MCL*	Analysis Date/ Time
3052022-01	Sample Name: 20010000-001 BF22B Sampled: 2/17/23 10:45 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	1	ppb	1	15 ppb	03/02/23 16:01
3052022-02	Sample Name: 20010000-003 SF22B Sampled: 2/17/23 10:45 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	2	ppb	1	15 ppb	03/02/23 16:01
3052022-03	Sample Name: 20010000-006 SF22B Sampled: 2/17/23 10:45 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	2	ppb	1	15 ppb	03/02/23 16:01
3052022-04	Sample Name: 20010000-013 KF22B Sampled: 2/17/23 10:45 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	1	ppb	1	15 ppb	03/02/23 16:01

ND = None detected at the MRL **MRL** = Minimum Reporting Limit **MCL** = Maximum Contamination Limit

†All procedures for this analysis are in accordance with NELAP standards.

* The EPA MCL for Lead in Public Drinking Water Systems is 15 ppb; this is a maximum contamination level for lead in samples, this is not an acceptance level for health based exposure.

Note: Please make sure to send your results to the appropriate agency; Alexin Analytical does not forward these results to any program or person other than the above listed client. It is your responsibility to make sure these results get sent to whichever agency, city, or organization has requested them if these results are for compliance purposes.

Approved by: 
Adriana Gonzalez-Gray
Laboratory Director



**Professional
Laboratory
Services**

13035 SW Pacific Hwy
Tigard, OR 97223
Tel.: (503) 639-9311 Fax: (503) 684-1588

ANALYSIS REPORT

Reported: 03/03/2023
Received: 02/21/2023
Sampled By: Matthew C. Spear
Work Order: 3052024

C Environmental Inspection Services
L Attn: Matthew Spear
I 430 N. 1st Street
E Carlton OR, 97111
N
T Phone: (503) 680-6398

Project: RSD LIW Retest
Project # : -
Sample Type : Grab

Sampling Location: Highland Elementary School

Lab Number

	Code	Method	Result	Units	MRL	EPA MCL*	Analysis Date/ Time
3052024-01	Sample Name: 20010200-020 BF22B Sampled: 2/17/23 12:00 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	5	ppb	1	15 ppb	03/02/23 16:01
3052024-02	Sample Name: 20010200-050 CF22B Sampled: 2/17/23 12:00 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	2	ppb	1	15 ppb	03/02/23 16:01
3052024-03	Sample Name: 20010200-059 CF22B Sampled: 2/17/23 12:00 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	4	ppb	1	15 ppb	03/02/23 16:01
3052024-04	Sample Name: 20010200-073 CF22B Sampled: 2/17/23 12:00 Sample Composition: Raw Single						Matrix: Drinking Water
†Lead	1030	EPA 200.9	7	ppb	1	15 ppb	03/02/23 16:01

ND = None detected at the MRL **MRL** = Minimum Reporting Limit **MCL** = Maximum Contamination Limit

†All procedures for this analysis are in accordance with NELAP standards.

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Approved by: 
Adriana Gonzalez-Gray
Laboratory Director



**Professional
Laboratory
Services**

13035 SW Pacific Hwy
Tigard, OR 97223
Tel.: (503) 639-9311 Fax: (503) 684-1588

ANALYSIS REPORT

Reported: 03/03/2023
Received: 02/21/2023
Sampled By: Matthew C. Spear
Work Order: 3052025

C Environmental Inspection Services
L Attn: Matthew Spear
I 430 N. 1st Street
E Carlton OR, 97111
N
T Phone: (503) 680-6398

Project: RSD LIW Retest
Project # : -
Sample Type : Grab

Sampling Location: Reedsport Community Charter School

Lab Number

	Code	Method	Result	Units	MRL	EPA MCL*	Analysis Date/ Time
3052025-01	Sample Name: 20010100-084 BF22B						Matrix: Drinking Water
	Sampled: 2/17/23 15:00 Sample Composition: Raw Single						
†Lead	1030	EPA 200.9	3	ppb	1	15 ppb	03/02/23 16:01
3052025-02	Sample Name: 20010100-097 BF22B						Matrix: Drinking Water
	Sampled: 2/17/23 15:00 Sample Composition: Raw Single						
†Lead	1030	EPA 200.9	2	ppb	1	15 ppb	03/02/23 16:01
3052025-03	Sample Name: 20010100-113 CF22B						Matrix: Drinking Water
	Sampled: 2/17/23 15:00 Sample Composition: Raw Single						
†Lead	1030	EPA 200.9	ND	ppb	1	15 ppb	03/02/23 16:01

ND = None detected at the MRL **MRL** = Minimum Reporting Limit **MCL** = Maximum Contamination Limit

†All procedures for this analysis are in accordance with NELAP standards.

* The EPA MCL for Lead in Public Drinking Water Systems is 15 ppb; this is a maximum contamination level for lead in samples, this is not an acceptance level for health based exposure.

Note: Please make sure to send your results to the appropriate agency; Alexin Analytical does not forward these results to any program or person other than the above listed client. It is your responsibility to make sure these results get sent to whichever agency, city, or organization has requested them if these results are for compliance purposes.

Approved by: _____


Adriana Gonzalez-Gray
Laboratory Director

APPENDIX 2.0

SAMPLE TABLE

CLIENT	PROJECT	PROJECTNUM	LabName	SAMPLENAME	LABSAMPID
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010000-001 BF22B	3052022-01
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010000-003 SF22B	3052022-02
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010000-006 SF22B	3052022-03
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010000-013 KF22B	3052022-04

CLIENT	PROJECT	PROJECTNUM	LabName	SAMPLENAME	LABSAMPID
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010200-020 BF22B	3052024-01
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010200-050 CF22B	3052024-02
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010200-059 CF22B	3052024-03
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010200-073 CF22B	3052024-04

CLIENT	PROJECT	PROJECTNUM	LabName	SAMPLENAME	LABSAMPID
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010100-084 BF22B	3052025-01
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010100-097 BF22B	3052025-02
Environmental Inspection Services	Lead School	-	Alexin Analytical Laboratories, Inc.	20010100-113 CF22B	3052025-03

APPENDIX 3.0

SAMPLE LOCATIONS

OREGON ADMINISTRATIVE RULES
OREGON HEALTH AUTHORITY, PUBLIC HEALTH DIVISION
CHAPTER 333

DIVISION 61

DRINKING WATER

333-061-0400

Reducing Lead in School Drinking Water

- (1) For the purposes of this rule, the following definitions apply:
 - (a) "School" means a school district, education service district, or public charter school.
 - (b) "Tap":
 - (A) Means any plumbing fixture in a building or on property owned or leased by a school where students or staff are present on a regular basis and where water is used for drinking or food preparation.
 - (B) Does not include any of the following classes of plumbing fixtures:
 - (i) Shower heads;
 - (ii) Pipes used to convey water to systems for building heat;
 - (iii) Dedicated eye wash stations and emergency showers;
 - (iv) Fixtures in areas with no student access used exclusively for building sanitation purposes by staff;
 - (v) Fixtures used exclusively for irrigation, unless it is reasonable to believe that students or staff will use water from that fixture for drinking; and
 - (vi) Fixtures in science and technical education classrooms that provide education to grades 6 through 12 exclusively where the fixtures:
 - (I) Have signs indicating they are not sources of drinking water; and
 - (II) Are not intended to be used for drinking or food preparation as part of the curriculum.
- (2) Initial testing.
 - (a) Schools must test for lead in the water from each tap at least once between January 1, 2016 and June 30, 2020, or prior to occupancy for taps added after these dates. Initial testing does not need to be repeated if:
 - (A) Testing was conducted and mitigation completed before November 1, 2018 according to EPA's *3Ts for Reducing Lead in Drinking Water in Schools, Revised Technical Guidance from October 2006*, adopted by reference; or

- (B) Testing was conducted and mitigation completed on or after November 1, 2018 according to EPA's *3Ts for Reducing Lead in Drinking Water in Schools and Childcare Facilities, October 2018*, adopted by reference.
- (b) Samples must be collected "first draw," before any water is used from that tap on the day it is tested.
- (3) On-going testing. Schools must collect a first draw sample as described in subsection (2)(b) of this rule and EPA's *3Ts for Reducing Lead in Drinking Water in Schools and Childcare Facilities, October 2018*, from each tap at least once every six years starting on July 1, 2020 according to OAR 581-022-2223, unless the following exemption applies:
 - (a) The tap was installed after January 4, 2014 and meets the lead-free standard of no more than 0.25 percent lead by weight and the piping feeding the tap is a material other than copper or was installed after January 4, 2014 and the solder and flux meets the lead-free standard of no more than 0.2 percent lead; and
 - (b) The tap was tested as required in section (2) and no more than 1 part per billion (ppb) of lead was detected.
- (4) All samples must be collected using cold water and must meet the following criteria:
 - (a) Sample bottles must be 250 milliliters (mL) in volume.
 - (b) Sample bottles must be assigned a unique identification number and the following information about the sample must be recorded:
 - (A) The date and time of sample collection;
 - (B) The name of the person that collected the sample; and
 - (C) The location or a description of the tap from which the sample is collected.
 - (c) Samples must be collected on a day when school was in session the previous day.
 - (d) Samples must be analyzed by a laboratory accredited for lead analysis in drinking water by the Oregon Laboratory Accreditation Program according to OAR chapter 333, division 64.
- (5) If a test result from a sample shows 15 or more parts per billion (ppb) of lead:
 - (a) A school must prevent access to the tap as soon as possible after receiving the sample test result and in no case more than 48 hours after receiving the test results; and
 - (b) A school must prevent access to the tap until testing and mitigation is completed according to section (6) of this rule; or
 - (c) If the tap is primarily used for sanitation purposes, such as restroom sinks, access may continue as long as clear signage is posted to notify people that the tap is not to be used for drinking or food preparation until mitigation is complete. Mitigation must be completed within 30 days unless an alternate schedule is approved by the Department of Education.
- (6) Following receipt of results that show a tap has 15 or more ppb of lead, a school must:

- (a) Collect a flushed sample from that tap. This sample must meet all the criteria specified in section (4) of this rule and be collected after water has flowed from the tap for 30 seconds as described in Step 2 of Module 5 of EPA's *3Ts for Reducing Lead in Drinking Water in Schools and Childcare Facilities, October 2018*; and
 - (b) Complete an appropriate permanent mitigation in accordance with Module 6 of EPA's *3Ts for Reducing Lead in Drinking Water in Schools and Childcare Facilities, October 2018*; and
 - (c) Test the tap after mitigation is complete, demonstrating lead is less than 15 ppb before access to the tap is resumed. A first-draw sample as described in subsection (2)(b) must be collected and analyzed.
- (7) All test results must be made available as specified in ORS 332.334.

Stat. Auth.: Oregon Laws 2017, Chapter 700

Stats. Implemented: ORS 332.331, Oregon Laws 2017, Chapter 700