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February 28, 2017

Mr. John W. Gilbert  
Facilities Manager  
**Falls City School District #57**  
111 N. Main Street  
Falls City, OR 97344

*Via email to: [john.gilbert@fallscityschools.org](mailto:john.gilbert@fallscityschools.org)*

**RE: Lead Water Testing Report**  
**Falls City Gymnasium Building (Facility #102)**  
**111 N. Main Street**  
**Falls City, Oregon 97344**

**TRC Project: 262545**

Mr. Gilbert:

At your request, TRC Environmental Corporation (TRC) performed lead in water testing at the Falls City School District Gymnasium Building located at 111 N. Main Street, in Falls City, Oregon.

**Testing Procedures**

Water testing was performed following the United States Environmental Protection Agency (USEPA) guidance document "3Ts for Reducing Lead in Drinking Water in Schools: Revised Technical Guidance." The 3Ts document provides an action limit of 20 parts per billion (ppb) for lead.

Samples were collected from cold water outlets on the interior of the building(s), including drinking fountains, kitchen food preparation sinks, classroom sinks, restroom sinks, mechanical room sinks, faculty lounge sinks, office sinks, plumbed refrigerator water outlets and water bottle refill stations. Any outlets that were broken or not in use at the time sampling was performed were documented as such and were not sampled.

A map of each school building was annotated with the sample locations for each outlet and each sample number and location which were recorded on a Drinking Water Sample Data Sheet & Chain of Custody. Sampling for the District was conducted during the school week on Tuesday through Friday. Samples were collected using plastic 250 mL unpreserved bottles. The unpreserved bottles were preserved by the laboratory after receipt per the analytical method. During sample collection, each bottle was marked with a school identification code followed by the sample number (Ex. 102-01A, 102-01B). Water was sampled without touching the mouth of the container to the faucet filling the bottle to approximately one inch from the top.

Two samples were collected from each of the cold water outlets being tested. The first sample collected was the first draw sample (also called an A sample). The first draw sample is the first flow of water from the outlet into the bottle and represents the water standing in the fixture that would initially be consumed. The flush sample (also called a B sample) was collected into a new sample bottle 30 seconds after the water has been allowed to continuously flow from the outlet. The flush sample represents the water from the plumbing line behind the wall and outlet. Upon completion of a sampling event, the sample bottles were packaged and the Water Sample Data Sheet & Chain of Custody Record was signed and delivered with the samples to Edge Analytical, Inc., an independent third-party, accredited laboratory.

### **Laboratory and Analytical Method**

Analysis for lead was performed by Edge Analytical, Inc. an Oregon drinking water accredited laboratory, using the EPA Method 200.8 for analysis.

### **Samples Collected and Results**

The District identified a total of eight (8) water fixtures prior to conducting the flushing and sampling activities. Sampling was conducted on August 5, 2016. Of the eight (8) first draw samples collected, three (3) had results above the action level of greater than 15 parts per billion (ppb) for lead. The first draw results (A sample) which were at or greater than 15 ppb for lead are noted in the table below. A complete list of the analytical results noting all rooms and outlets sampled can be found in Appendix A.

<b>Sample #</b>	<b>Location and Fixture Description</b>	<b>Analyte</b>	<b>Result</b>	<b>EPA Limit</b>	<b>FCSD Action Limit</b>
102-1A	Girl's Locker Room Sink	Lead	210 ppb	20 ppb	>15 ppb
102-7A	Women's Restroom Sink	Lead	209 ppb	20 ppb	>15 ppb
102-8A	Concession Area Sink	Lead	93 ppb	20 ppb	>15 ppb

ppb = parts per billion  
EPA = Environmental Protection Agency  
FCSD = Falls City School District

### **Recommendations**

TRC recommended that the District suspend the use of the water at the three (3) fixtures listed in the table above and take action to lower the concentrations for lead to those fixtures by replacing the associated outlet and supply lines from the wall to the outlet. In the interim, as recommended by the USEPA short-term control measures such as flushing the piping in the system at the fixtures noted above, every morning before the facility opens, can be conducted to remove water that has been standing in the interior pipes and or fixtures. Additionally, TRC recommended that those fixtures be suspended from use until after the associated outlet, supply line from the wall to the outlet and any necessary plumbing lines are replaced. Once the replacements are made, TRC recommended the District have the water from the new outlets re-sampled for lead to determine if the outlet, supply line and plumbing line replacement (as applicable) has resolved the issue prior to allowing these faucets to be used without the short-term control measures noted above.

A copy of the sample location map can be found in Appendix B.

### **Follow-up Samples Collected and Results**

Three of the total eight water fixtures were determined to be above the action level at the time sampling was conducted and are represented in the table above. The District elected not to analyze the B samples, and instead proceeded directly to replacing the fixtures at these locations. TRC performed follow-up sampling of the three previously elevated fixtures within this school building once the fixtures were replaced. Follow-up sampling was conducted on November 18, 2016 and January 20, 2017. All three samples remained above the action level during the sampling event in November; however, it was reported that these fixtures were most likely not used once they were replaced. District facilities personnel tagged these fixtures as not in use, but proceeded to utilize them the week prior to the sampling in January in order to mimic regular use. The fixtures were then allowed to set unused for 8-18 hours prior to sample collection on January 20, 2017. The samples for both fixtures were below the action level during the January 20<sup>th</sup> sampling event.

### **Conclusions**

Based on the fixture replacement activities completed by District and follow-up sample results indicating all sample locations at this facility being below the action level, TRC offers no further recommendations at this time.

TRC appreciates the opportunity to provide you with environmental consulting services. We look forward to working with you on future endeavors. If you have any questions or comments concerning this report, please call TRC at (503) 387-3251.

Sincerely,  
TRC Environmental Corporation



Jason Stone  
Industrial Hygienist



Ron Landolt  
NW Region BSI Practice Manager

## Appendix A – Analytical Results



**Portland, OR** *Microbiology/Chemistry (c)*  
9150 SW Pioneer Ct Ste W - Wilsonville, OR 97070 - 503.682.7802

**Corvallis, OR** *Microbiology/Chemistry (d)*  
540 SW Third Street - Corvallis, OR 97333 - 541.753.4946

**Bend, OR** *Microbiology (e)*  
20332 Empire Blvd Ste 4 - Bend, OR 97701 - 541.639.8425

Client Name: TRC - Milwaukie  
4120 SE International Way  
Suite A110  
Milwaukie, OR 97222

Reference Number: **16-19594**

Project: 102 - Gym Building

System Name:  
System ID Number:  
DWP Source Number:  
Multiple Sources:  
Sample Type:  
Sample Purpose: Investigative or Other  
County:

Analyst: bj  
Date Received: 8/5/2016  
Report Date: 8/12/2016  
Approved By: ljh  
Authorized by:

Chandph

Thanh B Phan  
Lab Manager, Portland

[illegible]

RL (Reporting Level): indicates the minimum reporting level.

AL: Federal Action Levels are 0.015 mg/L for Lead and 1.3 mg/L for Copper under the Lead and Copper Rule for public water systems. A blank MCL value indicates a level is not currently established.

ND (Not Detected): indicates that the compound was not detected above the Reporting Level (RL).

These test results meet all the requirements of NELAP, unless otherwise stated in writing, and relate only to these samples. If you have any questions concerning this report contact Lawrence J Henderson at the above phone number.

Project #: 262545  
School Name (#): 102-Gym Building

47589 - 47596

Sampled By: Ron Landolt

Date of Flush: 8/4/16 Date of Sampling: 8/5/16

[illegible]





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Client Name: TRC - Milwaukie  
4120 SE International Way  
Suite A110  
Milwaukie, OR 97222

Project: 262545-Phase 2 Falls City  
S.D.- Gymnasium Bldg

System Name:  
System ID Number:  
DWP Source Number:  
Multiple Sources:  
Sample Type:  
Sample Purpose: Investigative or Other  
County:

Analyst: mvp  
Date Received: 11/18/2016  
Report Date: 11/23/2016  
Approved By: bj  
Authorized by:

Champh

Thanh B Phan  
Lab Manager, Portland



Sampled By: Kevin Lovellett  
Date of Flush: 11/17/16 Date of Sampling: 11/17/16

[illegible]





**Portland, OR *Microbiology/Chemistry (c)***  
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**Corvallis, OR *Microbiology/Chemistry (d)***  
540 SW Third Street - Corvallis, OR 97333 - 541.753.4946

**Bend, OR *Microbiology (e)***  
20332 Empire Blvd Ste 4 - Bend, OR 97701 - 541.639.8425

Client Name: TRC - Milwaukie  
4120 SE International Way  
Suite A110  
Milwaukie, OR 97222

Reference Number: **17-01354**

Project: 262545- Falls City SD -  
Gymnasium, Phase 3

System Name:  
System ID Number:  
DWP Source Number:  
Multiple Sources:  
Sample Type:  
Sample Purpose: Investigative or Other  
County:

Analyst: bj  
Date Received: 1/20/2017  
Report Date: 1/24/2017  
Approved By: anp  
Authorized by:

Colin P O'Dwyer  
Chemist/Microbiologist

NOTES:

RL (Reporting Level): indicates the minimum reporting level.

AL: Federal Action Levels are 0.015 mg/L for Lead and 1.3 mg/L for Copper under the Lead and Copper Rule for public water systems. A blank MCL value indicates a level is not currently established.

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# DRINKING WATER SAMPLE DATA SHEET & CHAIN OF CUSTODY RECORD

17-01354

3150-3152

Project #: 262545, Phase 3  
School Name (#): Falls City S.D. - Gymnasium

Sampled By: Ken Landolt  
Date of Flush: \_\_\_\_\_

Date of Sampling: 1/20/77



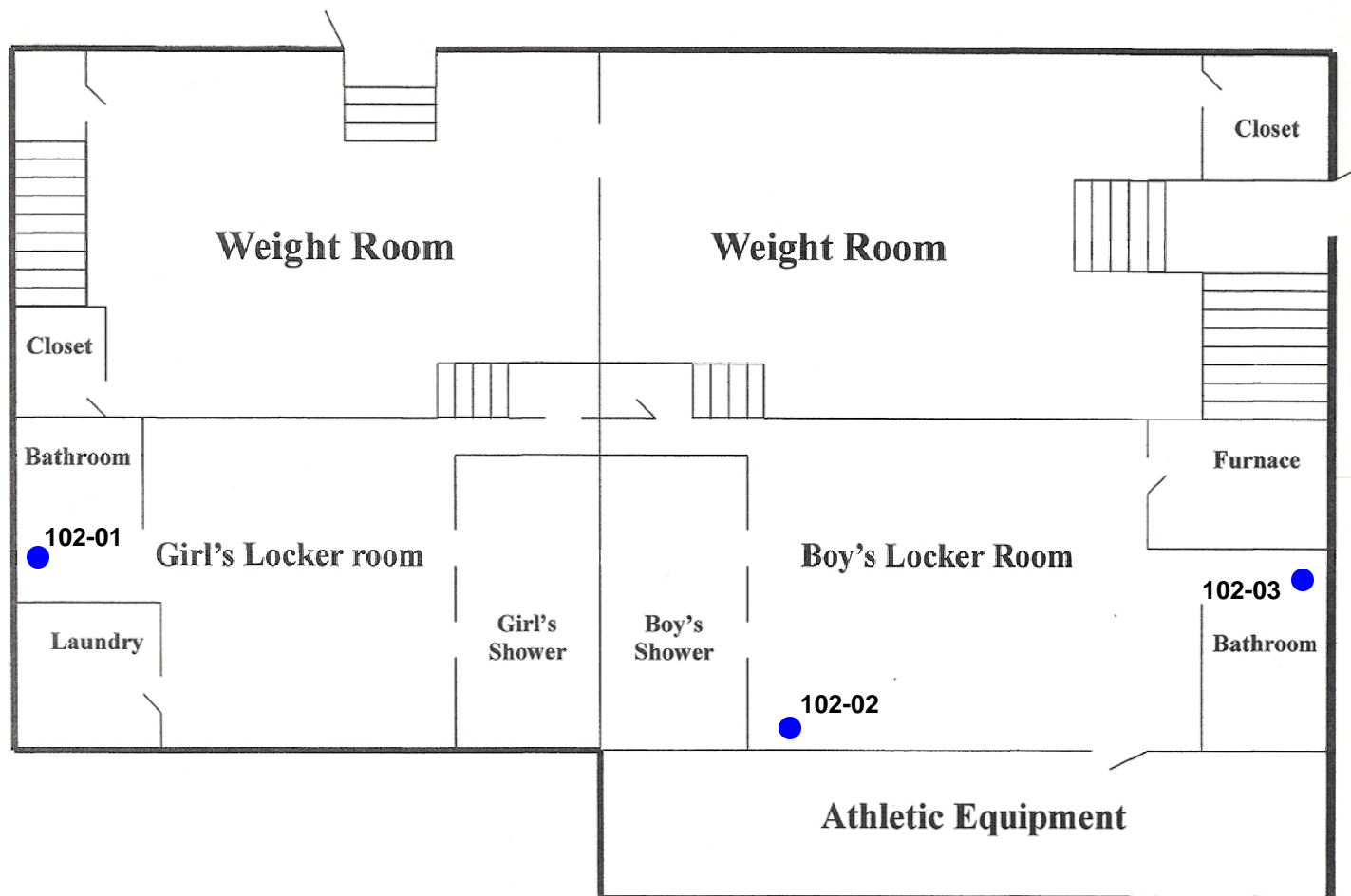
Date of Sampling: 1/20/17

[illegible]

TRC Environmental Corp. - 4120 SE International Way, Suite A110, Milwaukie, OR 97222 Phone: (503) 387-3251 Fax: (503) 908-1318

## Appendix B – Sample Location Map(s)

# Gym: Lower Floor



## LEGEND

● — Drinking Water Sample Location

## ASBESTOS SURVEY REPORT SAMPLE LOCATION MAP

FALLS CITY SCHOOL DISTRICT – LIBRARY/SCIENCE BUILDING  
111 NORTH MAIN STREET  
FALLS CITY, OREGON 97344

TRC Project No.: 262545

Figure: 1

Drawn by: MC

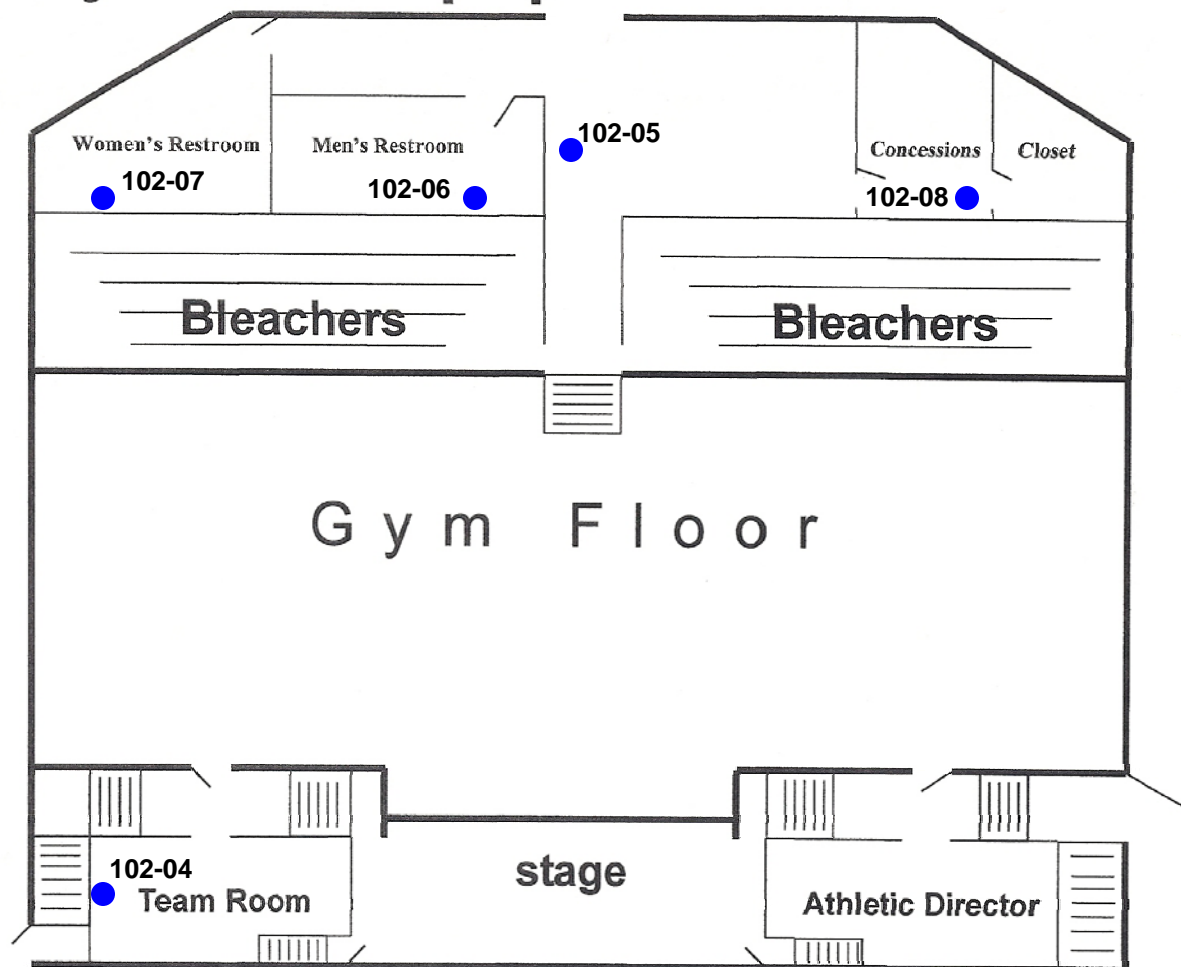
Checked by: RL

Date: 2/28/17



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# Gym: Upper Floor



## LEGEND

● — Drinking Water Sample Location

## ASBESTOS SURVEY REPORT SAMPLE LOCATION MAP

FALLS CITY SCHOOL DISTRICT – LIBRARY/SCIENCE BUILDING  
111 NORTH MAIN STREET  
FALLS CITY, OREGON 97344

TRC Project No.: 262545

Figure: 2

Drawn by: MC

Checked by: RL

Date: 2/28/17



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