



4105 SE International Way
Suite 505
Milwaukie, OR 97222

T 503.387.3251
TRCcompanies.com

June 7, 2022

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

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

TRC Project: 462109

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, classroom sinks, restroom sinks, and eye wash stations. Any outlets that were broken or not in use at the time sampling was performed were documented as such and were not sampled.

Prior to conducting the water testing, flushing occurred at each outlet to be sampled 8 to 18 hours prior to the sampling event. A map of each school 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. During flushing, the water lines for each identified fixture within the building were purged by running each outlet for 1 minute. After flushing each outlet, the building was closed and locked until TRC returned to perform the water sampling the following morning.

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 the date the sample was collected followed by the school identification code, sample number, and fixtured identification description (Ex. 102-001-BF). Sampling at each water outlet was conducted 8 to 18 hours after flushing was completed, prior to being used. Water was sampled without touching the mouth of the container to the faucet filling the bottle to approximately one inch from the top. One sample was collected from each of the

cold water outlets being tested. The sample collected as a first draw sample, which 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. 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 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 nine (9) water fixtures prior to conducting the flushing and sampling activities. Sampling was conducted on October 1, 2021. Of the nine (9) first draw samples collected, three (3) had results above the action level of 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, and a copy of the sample location map can be found in Appendix B and photo logs provided in Appendix C.

Sample #	Location and Fixture Description	Analyte	Result	EPA Limit	FCSD Action Limit
102-001-BF	Girl's Locker Room Sink	Lead	23.2 ppb	20 ppb	>15 ppb
102-008-KF	Concession Area Sink	Lead	30.5 ppb	20 ppb	>15 ppb
102-009-DW	Girl's Locker Room Drinking Fountain	Lead	39.6 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.

Follow-up Samples Collected and Results

Three (3) of the total nine (9) 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 (3) previously elevated fixtures within this school building once the fixtures were replaced. Follow-up sampling was conducted on May 18, 2022. All three (3) samples were below the action level during the May 18th, 2022 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



Chloe Hudson
Industrial Hygienist



Ron Landolt
NW Region BSI Practice Manager

Appendix A – Analytical Results



Burlington, WA Corporate Laboratory (a)
1620 S Walnut St - Burlington, WA 98233 - 800.755.9295 • 360.757.1400

Bellingham, WA Microbiology (b)
805 Orchard Dr Ste 4 - Bellingham, WA 98225 - 360.715.1212

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

Corvallis, OR Microbiology/Chemistry (d)
1100 NE Circle Blvd, Ste 130 - Corvallis, OR 97330 - 541.753.4946

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

LEAD & COPPER RULE REPORT

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

Reference Number: **21-37443**

Project: 462109 - Falls City
Gymnasium Building 102

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

Analyst: bj
Date Received: 10/1/2021
Report Date: 10/8/2021
Approved By: anp
Authorized by:


Thanh B Phan
Lab Manager, Portland

Lab Number	Date Collected	Site / Location	EPA #	Analyte Name	Result	Units	AL	RL	METHOD	Lab	Comments
21_72130	10/1/2021	1012021-102-001-BF - Girl's Locker Room	1030	LEAD	23.2	ppb	15	1	200.8	4072	
21_72131	10/1/2021	1012021-102-002-DW - Boy's Locker Room	1030	LEAD	ND	ppb	15	1	200.8	4072	
21_72132	10/1/2021	1012021-102-003-BF - Boy's Locker Room	1030	LEAD	1.4	ppb	15	1	200.8	4072	
21_72133	10/1/2021	1012021-102-004-CF - Team Room	1030	LEAD	3.5	ppb	15	1	200.8	4072	
21_72134	10/1/2021	1012021-102-005-DW - Gym Entry	1030	LEAD	1.0	ppb	15	1	200.8	4072	
21_72135	10/1/2021	1012021-102-006-BF - Men's Restroom	1030	LEAD	3.6	ppb	15	1	200.8	4072	
21_72136	10/1/2021	1012021-102-007-BF - Women's Restroom	1030	LEAD	11.4	ppb	15	1	200.8	4072	
21_72137	10/1/2021	1012021-102-008-KF - Concession's	1030	LEAD	30.5	ppb	15	1	200.8	4072	
21_72138	10/1/2021	1012021-102-009-DW - Girl's Locker Room	1030	LEAD	39.6	ppb	15	1	200.8	4072	

NOTES:

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

AL Federal Action Levels are 0.015 mg/L (15 ppb) for Lead and 1.3 mg/L (1300 ppb) 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 Thanh B Phan at the above phone number.

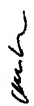





WATER SAMPLE CHAIN OF CUSTODY FORM

Client: Falls City School District		Project Number: 462109		21-37443 72130 - 72138		Sampling Technician(s): Chloe Hudson	
Project Name: Falls City Gymnasium Building - Drinking Water Testing Falls City School District 57		School Info: Falls City Gymnasium Building 102		Requested TAT: Standard			
MICROBIAL SAMPLE INFORMATION							
Sample Date / Time	Sample Identification	Fixture ID	Sample Location	Volume / Area Collected	Laboratory Analysis Requested		
10/01/2021 / 7:27 am	1012021-102-001-BF	102-001-BF	Girl's Locker Room	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:30 am	1012021-102-002-DW	102-002-DW	Boy's Locker Room	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:30 am	1012021-102-003-BF	102-003-BF	Boy's Locker Room	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:32 am	1012021-102-004-CF	102-004-CF	Team Room	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:33 am	1012021-102-005-DW	102-005-DW	Gym Entry	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:35 am	1012021-102-006-BF	102-006-BF	Men's Restroom	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:35 am	1012021-102-007-BF	102-007-BF	Women's Restroom	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:36 am	1012021-102-008-KF	102-008-KF	Concession's	500	EPA 200.5 / EPA 200.8		
10/01/2021 / 7:27 am	1012021-102-009-DW	102-009-DW	Girl's Locker Room	500	EPA 200.5 / EPA 200.8		
Special Instruction to Laboratory: 10 Day TAT							
CHAIN OF CUSTODY INFORMATION AND LABORATORY INFORMATION							
Relinquished By:		Date and Time		Received By:		Date and Time	

Edge 10/4/21 0820

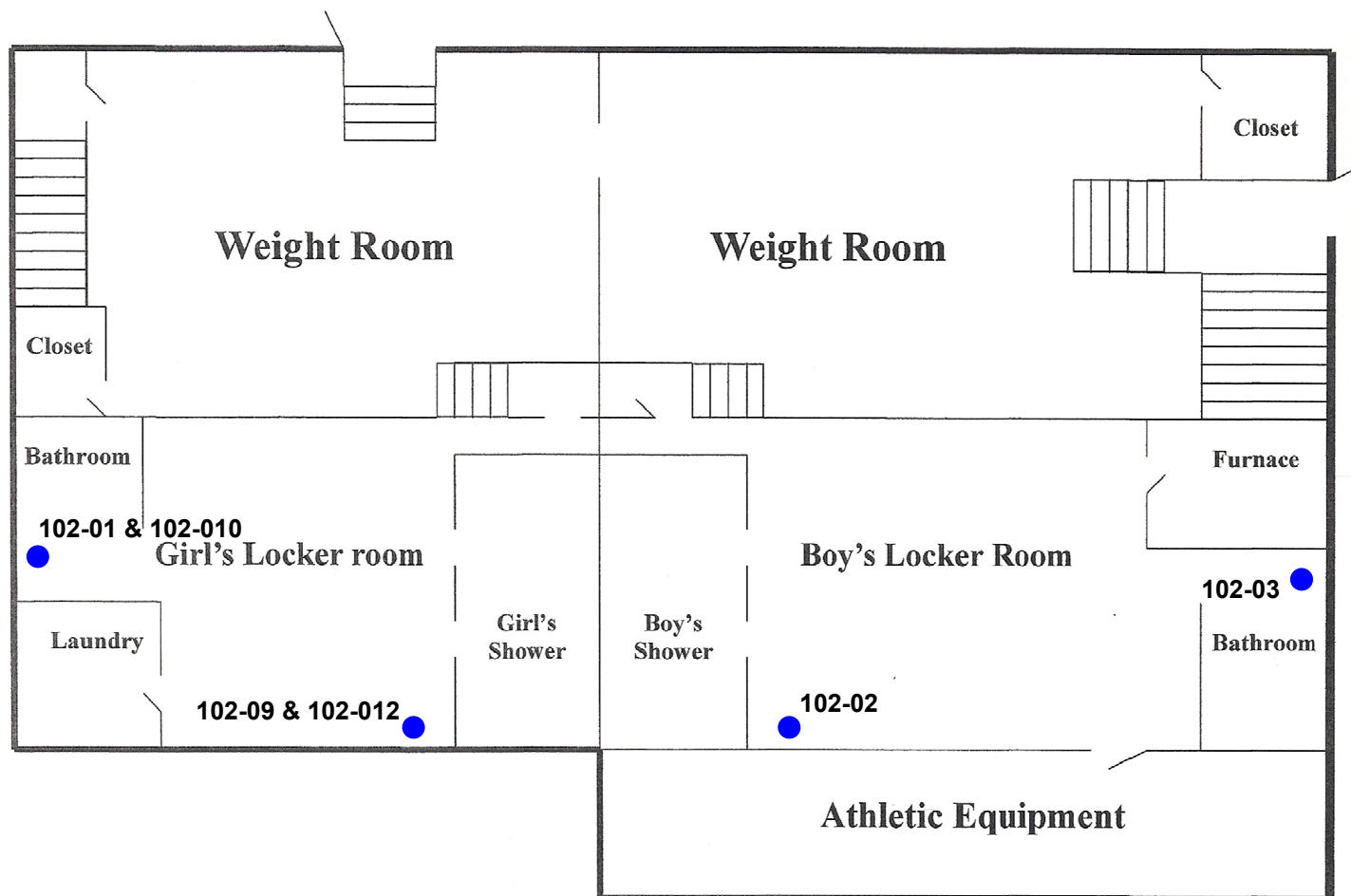
VO 20.5

1. (Print): Chloe Hudson			Amnd	10-1-21 1050
		10/01/2021 7:37 am America/Los Angeles		
			17.1°C	
I. (Sign): 				
II. (Print):				
(Sign):				
Email Results to: randolf@trccompanies.com	Lab Comments:			

 <p>4105 SE International Way 505 Milwaukee OR 97222</p>		<h1 style="text-align: center;">WATER SAMPLE CHAIN OF CUSTODY FORM</h1>			
Client: Falls City School District		Project Number: 462109		Sampling Technician(s): Chloe Hudson	
Project Name: Falls City Gymnasium Building - Drinking Water Testing Falls City School District 57		School Info: Falls City Gymnasium Building 102		Requested TAT: Standard	
MICROBIAL SAMPLE INFORMATION					
Sample Date / Time	Sample Identification	Fixture ID	Sample Location	Volume / Area Collected	Laboratory Analysis Requested
05/18/2022 / 7:13 am	102-010BF22A	102-010BF	Girl's Locker Room (102-01 Resampling)	500	EPA 200.5 / EPA 200.8
05/18/2022 / 7:08 am	102-011KF22A	102-011KF	Concession's (102-08 Resampling)	500	EPA 200.5 / EPA 200.8
05/18/2022 / 7:14 am	102-012DW22A	102-012DW	Girl's Locker Room (102-09 Resampling)	500	EPA 200.5 / EPA 200.8
Special Instruction to Laboratory: 10 Day TAT					
CHAIN OF CUSTODY INFORMATION AND LABORATORY INFORMATION					
Relinquished By:		Date and Time		Received By:	
1. (Print): Chloe Hudson		5/18/22 10/01/2022 7:37 am America/Los_Angeles		 5/18/22 0930	
(Sign):  II. (Print):				18°C	
(Sign):					
Email Results to: rlandolt@trccompanies.com		Lab Comments:			

Appendix B – Sample Location Map(s)

Gym: Lower Floor



LEGEND

● — Drinking Water Sample Location

LEAD WATER TESTING SURVEY REPORT SAMPLE LOCATION MAP

FALLS CITY SCHOOL DISTRICT – GYMNASIUM BUILDING
111 NORTH MAIN STREET
FALLS CITY, OREGON 97344

TRC Project No.: 462109

Figure: 1

Drawn by: CH

Checked by: RL

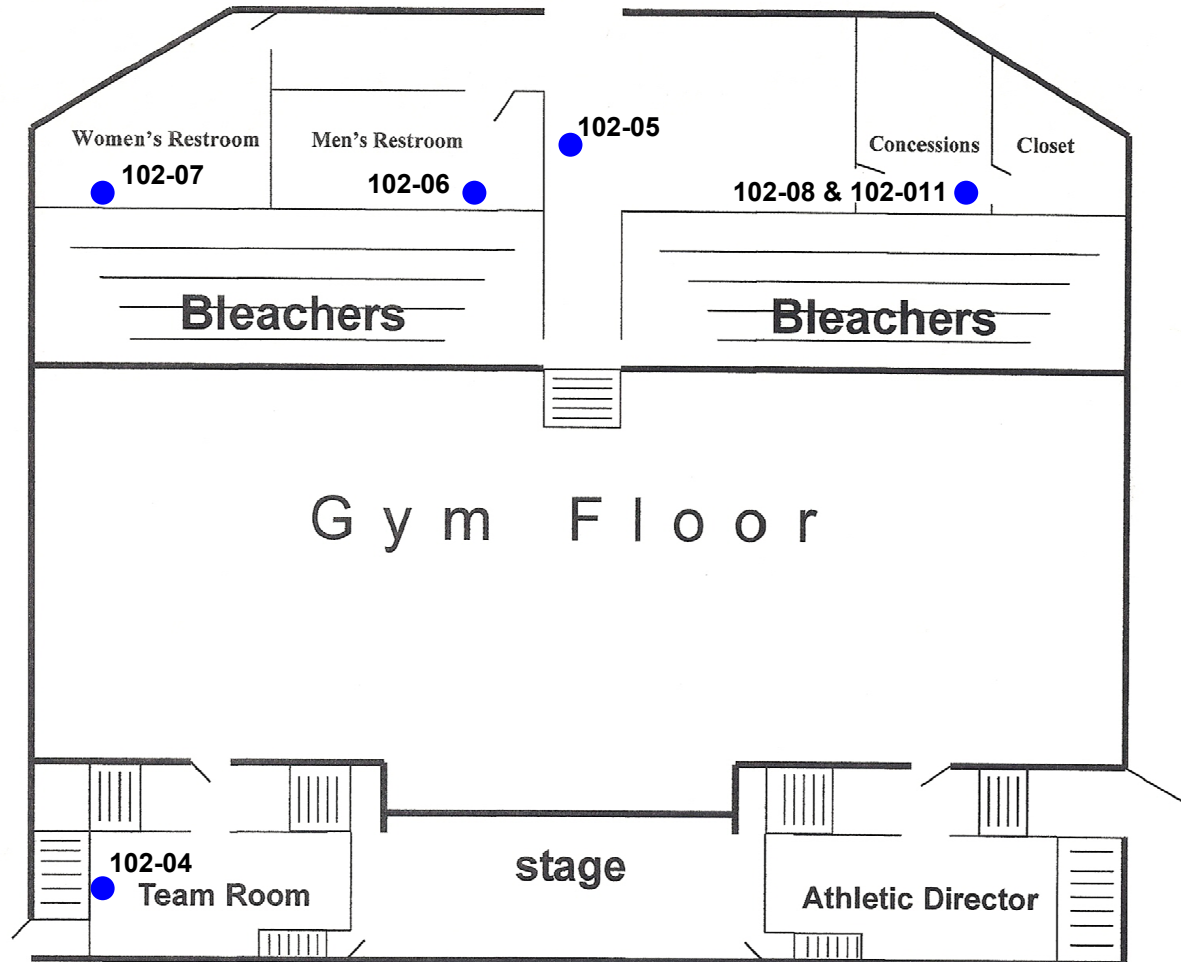
Date: June 2022



4105 SE International Way, Suite 505
Milwaukie, Oregon 97222

Phone: (503) 387-3251 Fax: (503) 908-1318

Gym: Upper Floor



LEGEND

● — Drinking Water Sample Location

LEAD WATER TESTING SURVEY REPORT SAMPLE LOCATION MAP

FALLS CITY SCHOOL DISTRICT – GYMNASIUM BUILDING
111 NORTH MAIN STREET
FALLS CITY, OREGON 97344

TRC Project No.: 462109

Figure: 2

Drawn by: CH

Checked by: RL

Date: June 2022



4105 SE International Way, Suite 505
Milwaukie, Oregon 97222

Phone: (503) 387-3251 Fax: (503) 908-1318

Appendix C – Photo Pages

FALLS CITY GYMNASIUM BUILDING – DRINKING WATER TESTING
111 NORTH MAIN STREET, FALLS CITY, OR 97344

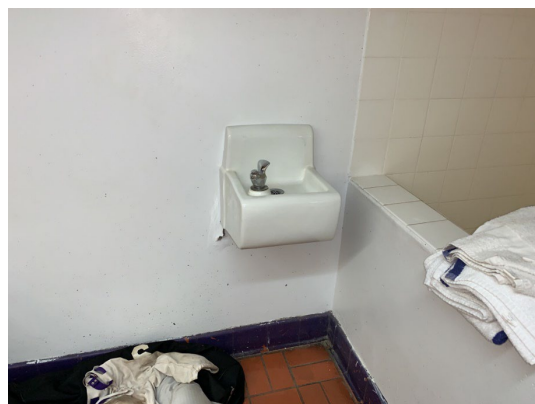
Institution Name: Falls City School District
Building ID Number: 102



Sample Date: 10/01/21
Sample Time: 07:27:00
Fixture Code: BF
Fixture ID: 102-001-BF
Sample ID: 1012021-102-001-BF
Result Above Reporting Limit (ppb): Yes
Result (ppb): 23.2
Above Action Level: Yes



Sample Date: 10/01/21
Sample Time: 07:30:00
Fixture Code: DW
Fixture ID: 102-002-DW
Sample ID: 1012021-102-002-DW
Result Above Reporting Limit (ppb): No
Result (ppb): ND
Above Action Level: No



FALLS CITY GYMNASIUM BUILDING – DRINKING WATER TESTING
111 NORTH MAIN STREET, FALLS CITY, OR 97344

Sample Date: 10/01/21
Sample Time: 07:30:00
Fixture Code: BF
Fixture ID: 102-003-BF
Sample ID: 1012021-102-003-BF
Result Above Reporting Limit (ppb): Yes
Result (ppb): 1.4
Above Action Level: No



Sample Date: 10/01/21
Sample Time: 07:32:00
Fixture Code: CF
Fixture ID: 102-004-CF
Sample ID: 1012021-102-004-CF
Result Above Reporting Limit (ppb): Yes
Result (ppb): 3.5
Above Action Level: No



Sample Date: 10/01/21
Sample Time: 07:33:00
Fixture Code: DW
Fixture ID: 102-005-DW
Sample ID: 1012021-102-005-DW
Result Above Reporting Limit (ppb): Yes
Result (ppb): 1.0
Above Action Level: No



FALLS CITY GYMNASIUM BUILDING – DRINKING WATER TESTING
111 NORTH MAIN STREET, FALLS CITY, OR 97344

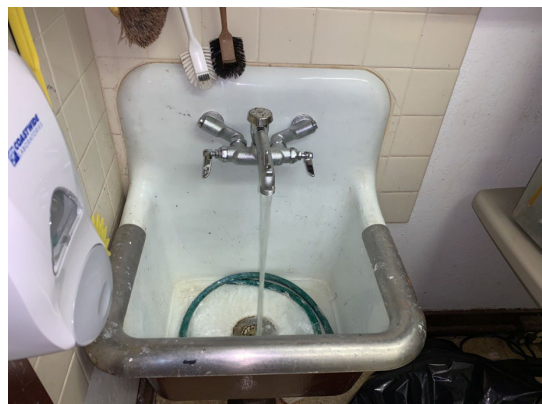
Sample Date: 10/01/21
Sample Time: 07:35:00
Fixture Code: BF
Fixture ID: 102-006-BF
Sample ID: 1012021-102-006-BF
Result Above Reporting Limit (ppb): Yes
Result (ppb): 3.6
Above Action Level: No



Sample Date: 10/01/21
Sample Time: 07:35:00
Fixture Code: BF
Fixture ID: 102-007-BF
Sample ID: 1012021-102-007-BF
Result Above Reporting Limit (ppb): Yes
Result (ppb): 11.4
Above Action Level: No



Sample Date: 10/01/21
Sample Time: 07:36:00
Fixture Code: KF
Fixture ID: 102-008-KF
Sample ID: 1012021-102-008-KF
Result Above Reporting Limit (ppb): Yes
Result (ppb): 30.5
Above Action Level: Yes



FALLS CITY GYMNASIUM BUILDING – DRINKING WATER TESTING
111 NORTH MAIN STREET, FALLS CITY, OR 97344

Sample Date: 10/01/21
Sample Time: 07:27:00
Fixture Code: DW
Fixture ID: 102-009-DW
Sample ID: 1012021-102-009-DW
Result Above Reporting Limit (ppb): Yes
Result (ppb): 39.6
Above Action Level: Yes



Sample Date: 05/18/22
Sample Time: 07:13:00
Fixture Code: BF
Fixture ID: 102-010BF
Sample ID: 102-010BF22A (follow-up sample)
Result Above Reporting Limit (ppb): Yes
Result (ppb): 9.8
Above Action Level: No



Sample Date: 05/18/22
Sample Time: 07:08:00
Fixture Code: KF
Fixture ID: 102-011KF
Sample ID: 102-011KF22A (follow-up sample)
Result Above Reporting Limit (ppb): Yes
Result (ppb): 6.5
Above Action Level: No



FALLS CITY GYMNASIUM BUILDING – DRINKING WATER TESTING
111 NORTH MAIN STREET, FALLS CITY, OR 97344

Sample Date: 05/18/22
Sample Time: 07:14:00
Fixture Code: DW
Fixture ID: 102-012DW
Sample ID: 102-012DW22A (follow-up sample)
Result Above Reporting Limit (ppb): No
Result (ppb): ND
Above Action Level: No

