

KELSAY

Environmental Consulting

September 29th, 2022

Mr. Ryan Johnson
Gladstone School District
17789 Webster Road
Gladstone, OR 97027

RE: Lead Water Sampling – Gladstone School District

At your request, during the summer of 2022, Kelsay Environmental collected drinking water samples for the analysis of lead at the five Gladstone School District facilities. The facilities were: Gladstone High School, Kraxberger Middle School, John Wetten Elementary, Gladstone Center for Children and Families and the District office.

The sampling locations for each facility pipe entering the facility; water fountains and sinks that can be used for drinking water. All sources for potable water and that would be anticipated to be used for drinking water were tested throughout the facilities.

Sampling Procedures

All sampling was conducted according to the Environmental Protection Agency's (EPA) Lead and Copper Rule. Revisions to the rule made effective December 2021 have been observed in this water sampling. Action level for lead is 15 ppb. The testing protocol is used by public water suppliers for lead and is designed to identify system wide problems that include:

If lead results for the sample are greater than 15ppb the facility is required to perform a remedy or remove the fixture from service.

Laboratory analysis was conducted by Alexin Analytical, ORELAP Accredited Lab#: OR-100013, in accordance with the National Environmental Laboratory Accreditation Program standards.

Results Summary

Kraxberger Middle School

Sampling at the site was conducted on June 4th, 2022, with two follow ups on June 11th and June 16th. A total of 75 fixtures were sampled in total from Kraxberger Middle School.

Laboratory results indicate a total of 11 water sources are above the action level for Lead (15 ppb). These 11 water sources include 2 Bubblers (Room 35 West end North Hall [Decommissioned] & Cafeteria South Central Wall) and 9 Sinks (Room 4 West Side, Room 10 West Wall, Hallway North of Small Courtyard, Kitchen Center Sprayer, Kitchen NE End Right Sink, Kitchen NE End Left Sink, Cafeteria South Central Wall and Room 32 East End South Wall).

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These areas were retested on September 2nd and only the Classroom Faucets in Classrooms 24 and 26 were above the 15 ppb level.

Kraxberger Water Sample Exceedances

DATE	SAMPLE NUMBER	FAUCET TYPE	LOCATION	LEAD EPA MCL: 15 ppb
6/4/2022	19310300 - 013SF	Sink	Library office, W wall	55
6/4/2022	19310300 - 023CF	Classroom Faucet	Classroom 24	99
6/4/2022	19310300 - 025CF	Classroom Faucet	Classroom 26	20
6/4/2022	19310300 - 033BF	Bathroom Faucet	Bathroom, N of room 22	51
6/4/2022	19310300 - 037BF	Bathroom Faucet	Bathroom Girls, N of room 9	38
6/4/2022	19310300 - 038CF	Classroom Faucet	Classroom 13, East Wall	32
6/4/2022	19310300 - 040CF	Classroom Faucet	Classroom 15, East Wall	18
6/4/2022	19310300 - 041DW	Bubbler	Classroom 15, East Wall	25
6/4/2022	19310300 - 045DW	Bubbler	Classroom 14, West Wall	17
6/4/2022	19310300 - 046CF	Classroom Faucet	Classroom 14, West Wall	42
6/4/2022	19310300 - 051CF	Classroom Faucet	Classroom 10, NW	47

Mr. Johnson

Re: Water testing at Gladstone School District

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Gladstone High School

Sampling at the site was conducted on June 4th, 2022 with a follow up on June 11th. A total of 114 fixtures were sampled in total from Gladstone High School.

Laboratory results indicate a total of 1 water sources are above the action level for Lead (15 ppb). This water source is 1 Sink located in Room J102 NE. In addition, two fixtures test at 15ppb. The ODE guidance documents consider 15 ppb as the threshold level and require action at that level.

Gladstone High School Water Sample Exceedances

DATE	SAMPLE NUMBER	FAUCET TYPE	LOCATION	LEAD EPA MCL: 15 ppb
6/11/2022	19310400 - 003SF	Staff Faucet	Room J102, NE	16
6/11/2022	19310400 - 016DW	Bubbler	Main Gym, SE	15
6/11/2022	19310400 - 092CF	Classroom Faucet	West of Room B106	15

District Office

Sampling at the site was conducted on June 11th, 2022. A total of 4 Fixtures were sampled.

Laboratory results indicate all drinking water fountains and sinks are below the EPA action level for Lead (15 ppb) and no further testing in these locations are required according to EPA regulations at this time.

Gladstone Center for Family and Children

Sampling at the site was conducted on June 4th, 2022, with two follow ups on June 11th and June 16th. A total of 60 fixtures were sampled in total from GCCF.

Laboratory results indicate a total of 3 water sources are above the action level for Lead (15 ppb). These 3 water sources include 3 Bubblers from K6, East of head start 9 and Head Start 10. In addition, two faucets from rooms K5 and the Kitchen tested positive table below details area and levels.

GCCF Water Sample Exceedances

DATE	SAMPLE NUMBER	FAUCET TYPE	LOCATION	LEAD EPA MCL: 15 ppb
6/11/2022	19310500 - 022DW	Classroom Faucet	K5, Center	22
6/11/2022	19310500 - 025DW	Bubbler	K6, center	70
6/11/2022	19310500 - 032KF	Kitchen Faucet	Kitchen South Wall West	23
6/11/2022	19310500 - 055DW	Bubbler	East of Head Start 9, Center	33
6/11/2022	19310500 - 058DW	Bubbler	Head Start 10 Center	36

Gladstone Health Clinic

Sampling at the site was conducted on June 16th. A total of 24 fixtures were sampled in total from GCCF.

Laboratory results indicate a total of 8 water sources are above the action level for Lead (15 ppb). These 13 water sources include 3 Classroom Faucets in rooms B115 and B112, 5 Exam Sinks in Rooms A104, A103, A102 and A108 and are tabled below.

Gladstone Clinic Water Sample Exceedances

DATE	SAMPLE NUMBER	FAUCET TYPE	LOCATION	LEAD EPA MCL: 15 ppb
6/16/2022	19310501 - 006CF	Classroom Faucet	B115 Classroom Faucet, E	17
6/16/2022	19310501 - 007CF	Classroom Faucet	B115 Classroom Faucet, W	22
6/16/2022	19310501 - 011CF	Classroom Faucet	B112 Classroom Faucet, W Wall, S	24
6/16/2022	19310501 - 014OT	Other	A104 Exam Sink	28
6/16/2022	19310501 - 015OT	Other	A103 Exam Sink	32
6/16/2022	19310501 - 016OT	Other	A102 Exam Sink	15
6/16/2022	19310501 - 021OT	Other	A108 Exam Sink, W Wall, S	32
6/16/2022	19310501 - 022OT	Other	A108 Exam Sink, W Wall, N	30

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John Wetten Elementary

Sampling at the site was conducted on June 4th, 2022, with one follow up on June 16th. A total of 107 fixtures were sampled in total from John Wetten Elementary.

Laboratory results indicate a total of 2 water sources are above the action level for Lead (15 ppb). These water sources include 2 Bubblers (Room 33 West End South Wall & Room 24 SW Corner).

John Wetten Water Sample Exceedances

DATE	SAMPLE NUMBER	FAUCET TYPE	LOCATION	LEAD EPA MCL: 15 ppb
6/4/2022	19310200 - 021DW	Bubbler	Room 9, W wall	28
6/4/2022	19310200 - 023DW	Bubbler	Room 10, W wall	55
6/4/2022	19310200 - 024CF	Classroom Faucet	Room 10, W wall	18
6/4/2022	19310200 -049DW	Bubbler	Room 33, West End, South Wall	20
6/4/2022	19310200 - 073DW	Bubbler	Room 24, SW Corner	51

Recommendations

Systemic water throughout the school was indicated below the action level for lead and copper at all sites. Follow up draws were in all cases were below the action level. All sites should have continued sampling.

1. Fixtures testing high for lead on can have one of the following actions.
 - a. Remove fixtures from use by turning off at supply.
 - b. Retest fixtures and see what the results turn as the fixtures may not have been being used and the water tested high due to a long stagnation period in the fixture. Retesting may also be desirable to assess potential systemic lead. However with the randomness of the exceedances in the buildings it is unlikely to be systemic.
2. If fixtures are to be retained, they should be sampled on a yearly basis. This will ensure that further degradation has not caused them to have high levels of lead/copper, regardless of daily flushing.
3. Random yearly sampling of fixtures to ensure degradation of the fixture has not caused them to have high levels of lead.

Limitations

It should be noted that when a moisture intrusion/mold remediation study is conducted, the findings and conclusions are limited to the tests and observations associated with that study. Conditions may exist beyond the scope of this investigation, which present health concerns. The findings and conclusions of this report are not scientific certainties, but rather, probabilities based on professional judgment concerning the significance of the data gathered during the course of the investigation.

Please find the attached tables, lab results and chain of custody for Kraxberger Middle School. Should you have questions or need anything further please call me at 864-710-7166.

Sincerely,



Brad Kelsay
Project Manager
Kelsay Environmental

Attached: Sampling Table Results Tables
Laboratory Results and Chain of Custody