



PUBLIC HEALTH DIVISION
Center for Health Protection, Drinking Water Services

Kate Brown, Governor

Oregon
Health
Authority

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<http://healthoregon.org/dwp>

November 23, 2015

Hal Jensen
PO Box 27
Timber, OR 97144

**Re: NOTICE OF VIOLATION
Unresolved Water System Survey Significant Deficiencies/Rule Violations
TIMBER WATER ASSOCIATION, PWS# 4100898**

Dear Hal:

A water system survey was completed for Timber Water Association on May 29, 2015 identifying significant deficiencies and rule violations to be corrected. A letter and copy of the survey report were mailed to your attention on June 4, 2015. Oregon Administrative Rule (OAR) 333-061-0076(6)(a) and OAR 333-061-0040(1)(k) requires water systems that use surface water sources respond in writing within 45 days of receiving the survey report with a corrective action plan describing how and when the deficiencies/violations will be corrected. A copy of the original survey letter is enclosed for your reference.

Timber Water Association was to complete corrective action by July 23, 2015 or have an Authority-approved corrective action plan with a reasonable timeframe to complete the corrective actions. To date, this information has not been received for the following three unresolved significant deficiencies:

1. Membrane direct integrity testing (pressure decay test or PDT) not being done daily as required.
2. Actions required in response to Sept. 2014 copper exceedance not completed as required.
3. Cross-connection annual summary report not submitted as required.

As a result, Timber Water Association is in violation and is now subject to formal enforcement which could include the assessment of civil penalties and public notification to all persons served by the water system. In order to return to compliance and avoid formal enforcement action, your corrective action plan to the water system survey report **must be received and approved by December 23, 2015.**

Please contact me by phone at 971-673-0410 or via email at gregg.c.baird@state.or.us if you have questions or comments.

I appreciate your immediate attention to this matter.

Sincerely,

Gregg Baird, REHS
Oregon Health Authority, Drinking Water Services

Enclosure: Survey cover letter dated 6/4/15

cc: Brad Daniels, Enforcement Officer, OHA-DWS



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June 4, 2015

Hal Jensen
Timber Water Association
PO Box 27
Timber, OR 97144

Dear Hal,

Thank you for your time and assistance in conducting a Water System Survey at **Timber Water Association** on **May 29, 2015**. The main purpose of the survey is to evaluate the entire water system in terms of supplying safe drinking water to the public. I have enclosed a copy of the report for your records. Please let me know if any corrections need to be made.

The first page of the report lists significant deficiencies and rule violations in the system that will have to be corrected as soon as possible. **You must submit a written corrective action plan describing how and when the deficiencies/violations will be corrected by July 23, 2015.** Once the deficiencies are corrected, you will need to send written verification that they have been corrected and the dates of correction.

The significant deficiencies and rule violations noted are as follows:

1. **Membrane direct integrity testing (pressure decay test or PDT) not being done daily as required.** System is currently not doing daily PDT due to hockey puck valves that leak (every time a PDT is attempted, the valves leak and the plant shuts down). Per operator, system has located suitable replacement valves but needs to obtain and install them. This must be done as soon as possible and daily PDT resumed.
2. **Reservoir roof/hatch not watertight.** The large redwood reservoir roof and hatch is in extreme disrepair and need to be replaced. Per operator, the system plans to replace the tank this summer. Prior to constructing a new reservoir, plans must be submitted to this office for review and approval. For more information about plan review, see our website at <http://www.healthoregon.org/pwsplanreview>.
3. **Actions required in response to Sept. 2014 copper exceedance not completed as required.** Due to the September 2014 Copper action level exceedance, the system is required to take several steps including, 1) monitor water quality parameters at the entry point and in the distribution system, 2) test the source for lead & copper, and 3) submit information to OHA-DWS on which treatment option will be installed for corrosion control. The deadline to complete these activities was 3/31/15. System must still complete these activities as well as monitor for lead & copper at 10 sites every 6 months beginning 1/1/15. For more information on these requirements, refer to letter I sent specifically regarding this issue dated 12/15/14 (see attached).
4. **Backflow prevention devices not tested annually.** Need to test the backflow prevention device at the Fire Station if it has not been tested yet this year and continue testing annually thereafter.
5. **Cross-connection annual summary report not submitted as required.** Need to submit the cross-connection annual summary report to OHA-DWS.
6. **No written protocols for undercertified operators.** These protocols are needed for all treatment plant operators that do not hold at least a Water Treatment 1 certification and all distribution system operators that do not hold at least a Water Distribution 1 certification. The protocols should explain

I need to know how and when these will be resolved

*Note:
Refer to
new
letter
dated
11/23/15
regarding
this
issue -*

what the undercertified operator can/cannot do without consulting the DRC and must be signed by both the undercertified operator and the DRC.

In addition, I have the following comments and recommendations:

1. Primary calibration standards are expired for both benchtop and online turbidimeters. Obtain valid calibration standards for both turbidimeters.
2. System needs to verify that the membrane PDT is at least 16.3 psig and the controller must be programmed such that a pressure decay rate of 0.20 psig/min or greater signals a failure of the PDT.
3. Provisions must be made for periodic calibration/verification of the membrane pressure sensors used in completing the PDT. A way to accomplish this is to obtain a factory calibrated pressure sensor that can be used to periodically check the accuracy of the sensors in use.
4. Continue updating and organizing the Operations & Maintenance Manual, including adding the broken fiber repair procedure to it.
5. Review and update the Emergency Response Plan as needed, especially emergency contacts and phone numbers.
6. A summary of Timber's chemical monitoring requirements can be found on page 12 and also on our Data Online website here: <https://yourwater.oregon.gov/scheduleschems.php?pwsno=00898> . Coliform sampling schedules can be found here: <https://yourwater.oregon.gov/schedulescoliform.php?pwsno=00898> .
7. Rotate monthly coliform sampling location according to your coliform sampling plan (currently only using Post Office site). If your lab collects your monthly coliform samples for you, provide your coliform sampling plan to the lab and ask them to follow it.
8. Recommend doing IOC testing since it has more than 9 years since the last test.
9. Reminder about testing due in 2015: Nitrate, VOCs, TTHMs/HAA5s (in July each year at 29595 NW TIMBER RD), Lead/Copper at 10 sites (June & December).
10. As a reminder, LT2 round 2 source water monitoring begins for your system in 2017. You must begin monitoring your source water for *E. coli* every two weeks for a year starting in October 2017. The due date to submit your monitoring plan is 7/1/17 (Note: you will get a reminder letter from me about this around April 2017).

If you have any questions or concerns, or would like this in an alternate format, please contact me at (971) 673-0410 or gregg.c.baird@state.or.us . Your cooperation is appreciated.

Sincerely,

Gregg Baird, REHS
Oregon Health Authority
Drinking Water Services

Encl: Copper Action Level Exceedance letter dated 12/15/14

cc: Jeremy Long/Ashley Davis, Washington County Environmental Health