

October 16, 2014

Eugene Kazemier  
Camp Attitude Oregon, Inc.  
PO Box 207  
Foster, OR 97345

RE: Notice of Non-Compliance regarding the Camp Attitude Public Water System

Mr. Kazemier,

Our records indicate that Camp Attitude Oregon, Inc. (Camp Attitude) owns and operates the Camp Attitude water system located at 45829 Santiam Hwy in Linn County, Oregon. Therefore, Camp Attitude is a water supplier as defined in Oregon Revised Statute (ORS) [448.115\(12\)](#) and Oregon Administrative Rule (OAR) [333-061-0020\(207\)](#), and has specific responsibilities as defined in OAR [333-061-0025](#).

Camp Attitude is a transient non-community public water system, identified by public water system ID #41-95229, which serves approximately 120 people, and is subject to regulation under ORS 448.115 to 448.290 and OAR [333-061-0005](#) through [333-061-0272](#).

The Oregon Health Authority, Public Health Division, Center for Health Protection, Drinking Water Services (DWS) has reviewed the operation of the Camp Attitude water system. This review has found that Camp Attitude is not in compliance with the following Oregon administrative rules, and is therefore not meeting its responsibilities as a water supplier as prescribed by the Oregon Drinking Water Quality Act (ORS 448.115 to ORS 448.290) and rules.

#### DESCRIPTION OF RULE VIOLATIONS

- Violation No. 1: OAR [333-061-0030\(4\)](#) specifies that the number of total coliform-positive samples shall not exceed one sample in any month at water systems where less than forty samples are collected for coliform bacteria. Coliform sampling results reported for the Camp Attitude water system indicate that more than two samples

were total-coliform-positive for the months of July 2013 and July 2014 as shown below:

- Five samples in July 2013;
- One sample in August 2013;
- One sample in March 2014; and
- Five samples in July 2014.

This exceeds the maximum contaminant level (MCL) for coliform bacteria and constitutes two violations of OAR 333-061-0030(4).

Additionally, samples collected in July 2013 indicated the presence of *E. Coli* bacteria. Fecal coliforms and *E. Coli* are bacteria whose presence indicates that the water may be contaminated with human or animal wastes. Microbes in these wastes can cause short-term effects, such as diarrhea, cramps, nausea, headaches, or other symptoms. They may pose a special health risk for infants, young children, some of the elderly, and people with severely compromised immune systems (OAR [333-061-0097](#)).

- Violation No. 2: OAR 333-061-0025 requires water suppliers to take all reasonable precautions to assure that the water delivered to water users does not exceed maximum contaminant levels and is free of public health hazards. The presence of coliform bacteria in samples collected at the Camp Attitude water system as described in Violation no. 1, combined with the failure to collect samples as required as described in Violation No. 2 indicates that Camp Attitude has not taken all the reasonable precautions to ensure that water does not exceed the MCL for coliform bacteria and that the Camp Attitude water system is free from public health hazards. This constitutes a violation of OAR 333-061-0025.
- Violation No. 3: [OAR 333-061-0036\(6\)\(a\)](#) requires water suppliers to sample for coliform bacteria at public water systems, but Camp Attitude did not report coliform sampling results to DWS as required by the rule for the following monitoring periods:
  - September 2013;
  - April 2014; and
  - August 2014.

This constitutes three violations of OAR 333-061-0036(6).

## ACTIONS REQUIRED TO ACHIEVE COMPLIANCE

Due to rule violations identified above, Camp Attitude is required to complete the following actions relating to Camp Attitude water system.

- Compliance Action No. 1: Camp Attitude must submit an action plan clearly identifying how it will ensure compliance with the MCL for total coliform bacteria at the Camp Attitude water system and ensure that the water system is free of public health hazards. The action plan must be submitted to DWS no later than November 15, 2014 and must consist of one of the following options:
  - A plan for the maintenance and operation of facilities at the Camp Attitude water system to comply with MCL of coliform bacteria; or
  - A plan for the installation of treatment to maintain disinfection residual throughout the distribution system that meets all applicable standards specified in [OAR 333-061-0050](#).
- Compliance Action No. 2: Camp Attitude must collect samples for coliform bacteria from the source water well for the Camp Attitude water system every month for twelve months according to OAR 333-061-0036(6)(w)(C)(ii). Samples must be representative of water from the source and collected prior to any application of treatment. Sample results must be reported to DWS no later than the 10<sup>th</sup> of the following month in which the sample was collected according to OAR [333-061-0040](#).
- Compliance Action No 3: Camp Attitude must, no later than March 31, 2015, complete corrective action as specified in a plan approved by DWS and submitted according to Compliance Action No. 1 above.
- Compliance Action No. 4: Camp Attitude must collect samples according to OAR [333-061-0036\(6\)\(a\)](#) for two consecutive calendar quarters and report the results according to OAR 333-061-0040. The first sample must be collected immediately following the completion of corrective action as specified in Compliance Action No. 3 above and must demonstrate coliform bacteria are not present in drinking water at the Camp Attitude water system.

- Compliance Action No. 5: Camp Attitude must publish a tier 2 public notice according to OAR [333-061-0042\(2\)](#) for failing to correct significant deficiencies and for exceeding the MCL for coliform bacteria. The notice must be issued within 30 days of the date of this notice and a copy of the notice must be reported to DWS within ten days after issuing the notice according to OAR 333-061-0040.

If Camp Attitude does not comply with the deadlines specified in this letter, the continued non-compliance may result in additional enforcement action including the assessment of civil penalties as prescribed by OAR [333-061-0090](#). Please contact Alyson Reynolds at Linn County Environmental Health at (541) 967-3821 ext. 2098 to discuss the compliance actions specified in this letter.

Respectfully,



Brad Daniels  
Enforcement Coordinator  
Oregon Health Authority, Drinking Water Services

cc: Alyson Reynolds, Linn County Environmental Health  
Betsy Parry, Oregon Health Authority, Drinking Water Services  
Dan Whitney, Camp Attitude, Oregon, Inc.