

**Drinking Water Advisory Committee**

Meeting Minutes

October 15, 2025

In-Person and Virtual Meeting (Teams)

Members and Alternate Members Present

**Adam Jackson**, Privately Owned Water Systems

**Ashley Davis**, Conference of Local Health Officials

**Beth Myers**, Oregon Environmental Lab Association

**Caroline Gross-Regan**, Oregon Environmental Health Association

**Cheyenne Holliday**, Water Consumers

**Craig Sheahan**, American Council of Engineering Companies of Oregon

**Jason Green**, Chair, Oregon Association of Water Utilities

**Jessica Dorsey**, Pacific NW Section, American Water Works Association

**Kim Ramsay**, Oregon Environmental Laboratory Association

**Lacey Goeres-Priest**, Vice Chair, League of Oregon Cities

**Mike Masters**, Large Water Systems

**Sandra Bishop**, League of Women Voters of Oregon

Members Absent

**Chris MacQuarrie**, Plumbers/Backflow Testers

**Craig Harper**, Watershed Councils

**Karen Lewotsky**, Environmental Advocacy Groups

**Michael Grimm**, Special Districts Association of Oregon

Guests

**Alyssa MacDonald**, City of Hillsboro

**Denise**, OAWU

**Erin Ruark**, City of Hillsboro

DWS Staff

Brad Daniels, Casey Lyon, Kari Salis, Michelle Byrd, Tony Fields, Paula Rich

**Welcome/roll call**

Jason Green welcomed attendees and took roll call.

### **Agenda check**

Samina is unable to attend; Casey Lyon is substituting for her today.

### **July meeting minutes and action items review**

Jessica motioned to approve the July minutes and Lacey seconded. A vote was taken and minutes were unanimously approved.

### **Member update/public input**

Discussion topic: Should labs be allowed to change/amend Sample Type after a test is completed? (Beth Myers)

- Historically, there have been instances when a Special sample was changed (when requested by, e.g., PWS or engineer) to Routine after it was run.
- Secretary of State audited OHA, said that no changes are allowed after a sample has been run.
- Recently, Beth became aware of an OHA engineer telling a PWS to tell the lab the change the category. She corresponded with engineer and clarified the rule.
- When there has been a mistake in marking the form, there are avenues for correcting true mistakes.
- Discussion: Other situations when changing sample types might be appropriate, responsibilities of labs for reporting to state (which is when the form is marked to be reported to state)
- DWS guidance has consistently been that mandatory reporting requirements do not apply to Special samples. It's up to the PWS and its operators to know the purpose of the sample and to mark form correctly.
- Kim and Beth maintain their labs will not report Special samples to the state or change Routine samples to Special.
- DWS will look into clarifying this rule.

### **Program update and discussion (Casey Lyon)**

- DWS Organizational Chart
- Staffing and recruitment: Four IIJA positions filled, DMCE unit is down two positions, recruiting currently for a Research Analyst (RA2) position.
- DWS program size and locations, contracts and agreements with counties, ODA, and others
- Circuit Rider contract ends in November 2026

- Priority non-compliers: OVS systems much higher numbers than EPA-recognized systems
- Funding: IIJA ends in 2026
- Service Line Inventory: 97.6% of systems have submitted. No lead lines reported.
- Rulemaking: PFAS under review, consumer confidence report (CCR) rule change
- U.S. Army Corps of Engineers deep drawdown operation: planned for this year at Green Peter and Lookout Point. In previous years, drawdowns resulted in very high turbidity at local PWSs.
- Oregon Very Small (OVS) water systems: A pending change to rule PE50 will take responsibilities for OVS systems (technical assistance, alerts, regulatory) away from counties and give to the state. Sue Yellowtail, DWS small system specialist, will oversee this.

#### **Update on operator reciprocity improvement process (Tony Fields)**

- Tony discussed two issues with EPA:
  - Potential for issuing a temporary certification to qualified certified out-of-state operators. EPA is not opposed, but asserts that due diligence is required. The delay in issuing reciprocity is usually because of the wait for other states to send DWS the required information. So the temporary certification, which is meant to bridge that gap in time, isn't useful if it can't be issued before all required information is received and processed. (Might as well just issue the standard certification.)
  - Potential for dropping the requirement for and affidavit to validate experience. EPA has no opinion. EPA does not stipulate how claims of hands-on experience are validated. Tony plans to talk with DOJ about next steps.
- Application process: Website (New Operator Certification page) has been updated with more background information. Step-by-step instructions for applying, and an expanded reciprocity section. Will have FAQ for reciprocity posted soon. Feedback welcome.
- Oregon can issue reciprocity certification (at some level) to operators from all other states, if they meet the requirements. Wyoming and Washington DC are the only two entities that do not have primacy.

### **EPA file review action items (Kari Salis, Michelle Byrd)**

- EPA's purpose is to ensure that DWS is determining compliance appropriately according to our rules, has adequate documentation, and is reporting data and violations properly.
- EPA reviews 25 random PWS files. Four-year review coming up in November.
- DWS still working on items from previous review, four years ago. With understaffing of DWS, prioritization is key to doing the best we can.
- What DWS did right: consistent reporting to federal database.
- Kari went over deficiencies. DWS plans to address the following: Treatment technique violations must be recorded and reported, survey form should include pump evaluations, must assign violations when Level 1 or 2 Assessments are not conducted on time, seasonal start-up procedures must be tracked and certified, must determine compliance and assign violations for failure to complete lead consumer notice requirements after sampling
- Planned for January 2026: Must issue violation when a system fails to conduct disinfectant residual monitoring along with total coliform compliance monitoring.
  - A grace period might be implemented to allow operators time to start complying.
  - Beth suggested contacting labs to remind them to remind people to fill in forms properly to avoid violations.
  - Jason Green pointed out that smaller systems may have trouble with the potential of earning violations for things they did not receive violations for in the past.
  - Question: If operators forget, can they call labs and ask for lab to write in number? Or send an amended form? DWS will send criteria needed to labs. Some latitude will be given when an operator just forgets to write the number for chlorine, but has done the monitoring.
- Wellfield designation policy must be re-examined. Oregon's is less stringent than federal, so wellfield determinations with monitoring reductions can no longer exist. There will be budget and sampling ramifications for PWS with current wellfield determinations. DWS will implement this change on a timeline that allows systems time to prepare.

- DWS plans to get sufficient time from EPA to comply with the requirement to enter all lead and copper sampling sites into the database and line up samples with sites.
- DWS is revising significant deficiency list. The survey forms will be updated.
- Notification about changes will primarily be done through email.

### **Working lunch – brainstorm topics for future meetings**

Jason reported on the progress of the new OAWU training center. Expected to be finished by end of November.

Ideas for future meetings:

- Training
- Backflow devices – unapproved assemblies have been discovered installed in PWSs. They have a Wilkins tag, but no stamp. These and other counterfeit devices are available on Amazon.
- Emergency response (wildfire, cyber, etc.)
- Technical, managerial, and financial capacity
- Source water protection (funding)
- Guest speakers
- Water system consolidation options – how to encourage systems to consolidate (funding?)
- Oregon Very Small systems (funding)
- Fee increases
- Manganese testing
- Regular report on legislation regarding regulations
- Direct lab reporting of OHA of *E. coli* special samples
  - Brad: The purpose of the rule was to ensure that all samples, special and standard, with contaminants are reported by labs directly to OHA. DWS worked closely with ORELAP to amend that rule (in about 2010; original rule regarding direct lab reporting written in 2006). In 2019, Joe Carlson of DWS suggested to DWAC that all special samples should be reported to OHA, and DWAC resisted.

More discussion might be beneficial. DWS is considering changes to the rule.

### Rulemaking review (Brad Daniels)

- Rulemaking process is delayed by a month after comments were received from EPA and DOJ, although the comments did not result in substantive changes. Brad shared a summary of the proposed rule amendments (no change from previous shared information).
- Answers to questions from committee member:
  - Due date for second CCR: Deadline for PWSs (serving more than 10,000) to deliver the second CCR to customers is December 31, and that is clearly stated in the rule. Within 10 days, report and certification must be submitted to OHA.
  - How is “substantial number of non-bill paying customers” defined? A water provider’s ability to determine whether consumers have the ability to access electronic forms of the report is vague.

Oregon adopted rule language from EPA, and it is vague (e.g., the definition of *substantial* number). So if a PWS reports to OHA that it has done due diligence and met the rule requirement, OHA will accept that.

- What other agencies or clearinghouses would OHA require reports be sent to?

Again, that language was adopted from EPA and has been in both federal and state rules from the rule’s inception. There is no clearinghouse in Oregon

- (Kari) Physical separation between raw water and finished water: Mike asked if an RP could be considered, but due to flow directions it’s unclear why a system would choose that over an air gap.
- State of Need and Fiscal Impact: No changes since July meeting. Brad asked members to review the document he emailed to them and send comments to him. He plans to file the rules with the Secretary of State between October 23 and 28. Then they are made available for public comment and further edits/changes are not possible during the public comment period. Public hearing is scheduled for November 19 via Teams. Written comments must be submitted

by Nov 31<sup>st</sup>. During December, comments are reviewed. Rules are effective January 1.

### **Action Items**

- Presenters to share PowerPoints

### **Closing comments**

None.

Meeting adjourned at about 1:30 p.m.

### **Next meeting**

January 21, 10:00 a.m. to 1:30 p.m. in Keizer and via Teams

To view video (link will expire 60 days from meeting date), go to:

[Recap: Drinking Water Advisory Committee Wednesday, October 15 | Meeting | Microsoft Teams](#)  
(Ignore Part 1)