Annual State Capacity Development Program Implementation Report

SFY 2025

Oregon Health Authority
Public Health Division
Center for Health Protection
Drinking Water Services

September 30, 2025

SFY 2025 Reporting Period: July 1, 2024–June 30, 2025

A. New systems program annual reporting criteria

1. ***Has the state's legal authority (statutes/regulations) to implement the New Systems Program changed within the previous reporting year? If so, please explain and identify how this change has affected the implementation of the New Systems Program (additional documentation, such as an attorney general (AG) statement or a statement from a delegated department attorney, may be required). If not, no additional information about legal authority is necessary.***

   Oregon's legal authority to implement the New Systems Program has not changed.

2. ***Have the state's control points ever been modified? If so, describe the modifications and any impacts these modifications have had on implementation of the New Systems Program. If not, no additional information on control points is necessary.***

   The state's control points have not been modified.

3. ***List new systems (PWS ID and name) established in the state within the past three years and indicate whether those systems have been on the enforcement targeting tool (ETT) list during their first three years of operation.***

   Eight new public water systems (Community [C] or Non-Transient Non-Community [NTNC]) were added to Oregon's public water system inventory during the reporting period. Table 1 lists these new systems.

Table 1: Community (C) and Non-Transient Non-Community (NTNC) public water systems established during SFY 2025

PWS ID	PWS name	System type	Activity status	Date	Activity reason
OR41 95756	Beef Northwest Feeders Boardman	NTNC	A	1/09/2025	New public water system
OR41 95757	Columbia Basin Onion	NTNC	A	3/11/2025	New public water system
OR41 95727	DLF Headquarters West	NTNC	A	2/26/2025	New public water system
OR41 01566	Finley Bend Estates	C	I	8/02/2024	Not active yet
OR41 95754	Kashmir Business Park LLC	NTNC	A	1/03/2025	New public water system
OR41 95707	Mapleton School District	NTNC	A	7/30/2024	New public water system
OR41 01541	Obsidian Trails	C	I	1/07/2025	Inactive as of 4/04/2025

OR41 01551	Prairie Crossing	C	A	3/06/2025	New public water system.

Oregon utilizes a violation system score list (i.e., ETT) to monitor system compliance. Table 2 lists the ETT history for the 28 active C and NTNC water systems added to Oregon's inventory during the last three reporting periods. Of the 28 systems listed below, four had a score of 11 or higher during that three-year period: Pae Living Building, Big Oak Marina, NPS Oregon Caves O&M, and Columbia Basin Onion.

Pae Living Building (https://yourwater.oregon.gov/inventory.php?pwsno=95690) received chemical late/nonreporting violations for the following analyte groups; Volatile Organic Chemicals (VOC), Synthetic Organic Chemicals (SOC), Nitrate (NO3). Late/non reporting Lead and Copper Rule (LCR) and the Surface Water Treatment Rule (SWTR). These violations were resolved such that the system is no longer a PNC.

Big Oak Marina (https://yourwater.oregon.gov/inventory.php?pwsno=06054) received chemical late/nonreporting violations for the following analyte groups; Total Coliform Rule (TCR), radionuclides (RAD), Volatile Organic Chemicals (VOC) and Synthetic Organic Chemicals (SOC). Late/non reporting Consumer Confidence Report (CCR) and TCR Acute Maximum Contaminant Level (MCL) for E. coli. These violations were resolved such that the system is no longer a PNC.

NPS Oregon Caves National Monument O&M (https://yourwater.oregon.gov/inventory.php?pwsno=95706) received chemical late/nonreporting violations for the following analyte groups; Synthetic Organic Chemicals (SOC), Nitrate (NO3), Nitrite (NO2), Arsenic (ARS), Inorganic Chemicals (IOC), Volatile Organic Chemicals (VOC), Disinfection Biproducts (DBP), late/nonreporting Lead and Copper Rule (LCR), late/nonreporting, and the Surface Water Treatment Rule (SWTR). These violations were resolved such that the system is no longer a PNC.

Columbia Basin Onion (https://yourwater.oregon.gov/inventory.php?pwsno=95757) received violations for the following monitoring and reporting issues; Coliform Investigation Nonreporting, LCR Late/Nonreporting, and Chemical MCL NO3 based on Average of Samples violations. While this system is actively working to resolve these issues, Columbia Basin Onion remains on the ETT list with 11 points for unresolved violations.

Regulators contact water systems when water quality alerts and rule violations occur to provide technical assistance and follow up activities to ensure the system returns to compliance.

Table 2: Enforcement targeting tool history for Community (C) and Non-Transient Non-Community (NTNC) active public water systems established during SFYs 2023, 2024 and 2025

PWS ID	PWS Name	Type	ETT
OR41 01561	Applegate Mobile Park (Upper)	C	No
OR41 95756	Beef Northwest Feeders Boardman	NTNC	No
OR41 06054	Big Oak Marina	C	Yes
OR41 95655	Biggs Service District	NTNC	No
OR41 95757	Columbia Basin Onion	NTNC	Yes
OR41 95726	DLF Headquarters East	NTNC	No
OR41 95689	Domaine Willamette Winery	NTNC	No
OR41 01537	Dry Canyon	C	No
OR41 01563	Fern Acres	C	No
OR41 01566	Finley Bend Estates	C	No
OR41 95754	Kashmir Business Park	NTNC	No
OR41 01560	Knoll Terrace Subdivision	C	No
OR41 01564	Lakeside Mobile Home Park (A)	C	No
OR41 95712	Little Monkeys ABC Daycare	NTNC	No
OR41 95707	Mapleton School District	NTNC	No
OR41 95706	NPS Oregon Caves National Monument O&M	NTNC	Yes
OR41 01541	Obsidian Trails	C	No
OR41 05690	Pae Living Building	NTNC	Yes
OR41 95704	Patrick Lumber Company	NTNC	No
OR41 01554	Port Orford RV Village	C	No
OR41 01551	Prairie Crossing	C	No
OR41 01558	Skyline Moorage & Marina	C	No
OR41 95742	Solid Ground Landscape	NTNC	No
OR41 95701	Soter Vineyards	NTNC	No
OR41 01555	Sunridge Estates Upper	C	No
OR41 95720	Union Creek Resort	NTNC	No
OR41 01565	Winchester Ridge	C	No
OR41 95699	Zoomtown RV Park	C	No

B. Existing systems strategy

1. Regarding the state's approved Existing Systems Strategy, which programs, tools, and/or activities were used, and how did each assist existing public water systems in acquiring and maintaining technical, managerial, and financial capacity? Discuss the target audience for these activities.

Oregon continues to work diligently at implementing its capacity development strategy which has been revised to include asset management implementation. One of the major keys to success has been the integration of capacity-building elements into day-to-day DWS activities.

As described in detail below, Oregon's capacity development strategy focuses on four areas: capacity assessment, information and communication services, training, and outreach.

Focus Area 1: Capacity Assessment

Program description and narrative

DWS staff assess water system capacity on water systems applying for funding through the Drinking Water State Revolving Fund (DWSRF) and on new water systems during the initial plan review process.

For DWSRF applicants, DWS staff perform the technical and managerial assessments, while Business Oregon (BizOR) performs a concurrent financial capacity assessment. During this process, DWS and BizOR cooperatively identify systems with capacity-related deficiencies and work with those systems to develop necessary capacity. Most deficiencies are easily corrected prior to final loan disbursement. More severe issues require correction before initiating the loan. This cooperative program has allowed water systems to make necessary capital improvements while improving overall capacity.

New public water systems are assessed during the initial plan review and approval process. All public water systems must comply with applicable requirements before serving drinking water to the public. Areas of evaluation include plan review, construction, master plan/feasibility study, operator certification, managerial processes,

ownership, water management and conservation, rate structure, and financial planning. All capacity deficiencies are documented, and corrective action is required. Requirements vary based on public water system type.

The target audience of the capacity assessment program is water system management and operators.

Activities during this reporting period

- Oregon conducted one DWSRF capacity assessment during the reporting period.
- An improved process for identifying, completing and tracking capacity assessments for new public water systems was implemented on July 1, 2023.
- A new data query tool was also created and implemented to identify new public water systems that need a capacity assessment with or without a plan review.
- Eight capacity assessments were completed by DWS staff for new public water systems this fiscal year.

Focus Area 2: Information and communication services

Program description and narrative

Oregon continually strives to better communicate with water system operators and managers and provide the essential information water systems need to maintain compliance.

Oregon DWS Website
Oregon uses its website to provide water-system-specific information, including public access to the state Safe Drinking Water Information System (SDWIS) database Drinking Water Data Online, https://yourwater.oregon.gov/. In addition to information on compliance-related monitoring and reporting, the DWS website provides many educational and resource materials, including technical-assistance handouts, a statewide public water system map, health-effects factsheets, training guides, and contacts for outside technical-assistance providers.

The DWS website, https://www.oregon.gov/oha/ph/HealthyEnvironments/DrinkingWater/Pages/index.aspx, also includes a capacity development-specific webpage that provides technical, managerial and financial capacity-related tools and resources for water system managers and operators. The Financial Capacity webpage includes links to two series of financial capacity handouts: budgeting and planning. The webpage also includes comprehensive resources in the areas of budgeting, rate setting, capital improvement planning, and asset management. Posted reports are made available to the public on this webpage.

To support continuing education for water system personnel, the DWS website includes a Training Opportunities webpage, https://www.oregon.gov/oha/PH/HealthyEnvironments/DrinkingWater/OperatorCertification/Pages/training.aspx. This webpage provides a one-stop-shopping site for water system operators and managers where they can view free upcoming training classes and webinars. Links to other training providers are also posted on this webpage.

DWS Newsletter — ePipeline

DWS continues to issue the ePipeline newsletter, https://www.oregon.gov/oha/PH/HealthyEnvironments/DrinkingWater/Operations/Pages/pipeline.aspx four times per year, which provides information regarding upcoming rules and deadlines, as well as operations and maintenance issues. DWS also conducts special mailings to inform drinking water systems about new rules and upcoming regulatory deadlines.

The target audience for these efforts includes system managers, operators, and the general public.

Activities during this reporting period

- The DWS website, including the Capacity Development webpage, was continually updated with current tools, resources, news and hot topics.
- The Training Opportunities webpage was continually updated with current free trainings.
- Asset Management Survey was provided to public water

system operators to gauge interest in using and receiving free technical assistance for creating and implementing an asset management plan.

DWS used the government email delivery system (GovDelivery) to send capacity development information via the ePipeline newsletter to all email-capable public water systems. DWS is able to communicate by email to 2,972 systems out of 3,310 active systems (90%), up two percent from last year.

Focus Area 3: Training

Program description and narrative

Training opportunities are available on all levels for water system operators and managers. All training is targeted, convenient and cost effective. Training guides, manuals and factsheets are continually identified, developed and made available. Training on capacity development and optimization for surface water systems is provided in coordination with the Area-Wide Optimization Program. The following training courses are provided by DWS on a recurring basis:

Basics for Small Water Systems Training Course. DWS provides training and assistance to small water systems to support their efforts to comply with small water system operator certification requirements. This free class covers the basics of water system operation and maintenance, water testing and other regulations, waterborne disease, water treatment for small systems, and recordkeeping. Small water system operators are required to attend one of these training classes every three years to maintain eligibility for DRC duties and responsibilities. The class is presented on a contractual basis by the Oregon Association of Water Utilities (OAWU: https://oawu.net/, the state affiliate of the National Rural Water Association), and is offered 20 times per year at numerous locations throughout the state, including a virtual class offered four times per year. More than 500 people attend the class annually.

Surface Water Treatment Training Courses. Three training classes have been developed and are taught by DWS staff members involved in implementing Oregon's Area-Wide Optimization

Program (AWOP). Course titles include *Essentials of Surface Water Treatment*, *Conventional and Direct Filtration*, and *Slow Sand Filtration*. Historically, the classes were held in person at various locations around the state, but they have been offered exclusively in a webinar format since 2020. Class content information, training materials, and scheduling are available online at the Surface Water Treatment Page, www.healthoregon.org/swt

Activities during this reporting period

- The *Basics for Small Water Systems* training course was held regularly as noted above.
- The following surface water treatment virtual trainings allowed Oregon operators to receive up to 6 contact hours of continuing education equivalent to 0.6 CEUs:
    - One training of the *Essentials of Surface Water Treatment* training (Part 1 held on October 2 and Part 2 held on October 3, 2024). Sixteen operators participated.
    - One 6-hour *Slow Sand Filtration* training (Part 1 held on May 7 and Part 2 held on May 8, 2025). Thirty-five operators participated.
    - One 6-hour *Conventional and Direct Filtration* training (Part 1 held on May 21 and Part 2 held on May 22, 2025). Twenty-nine operators participated.

Focus Area 4: Outreach

Outreach activities are performed daily through a variety of programs carried out by DWS. The target audience for the following outreach programs includes water system managers and operators.

The Drinking Water State Revolving Fund Program (DWSRF)

Program description and narrative

Oregon continues to have notable success with the DWSRF and associated outreach activities. DWSRF funds provide a funding mechanism for water systems that otherwise might be unable to afford needed modifications, upgrades and replacements of existing

drinking water system infrastructure to maintain compliance with the Safe Drinking Water Act. Oregon's outreach activities to promote this program are accomplished through a variety of methods, including industry presentations, one-stop meetings, ePipeline articles, GovDelivery bulletins (i.e., listserv), and routine updates to the DWSRF webpage. Additional outreach activities include the use of the circuit rider program to provide assistance to water systems in completing funding applications and letters of interest, dissemination of the DWSRF program brochures during routine water system encounters, and DWSRF program signage at construction sites.

Activities during this reporting period

- In addition to the Base DWSRF, significant program focus has been on the new, highly sought-after Infrastructure Investment and Jobs Act (IIJA) funding. IIJA was signed into law on November 15, 2021. Oregon DWS and BizOR staff and management have devoted substantial resources to IIJA's development and program implementation stages, which are ongoing. IIJA funding is available as General Supplemental, Lead Service Line Replacement (LSLR), and Emerging Contaminants (EC) for federal fiscal years (FFY) 2022– 2026. Due to high demand, Oregon's DWSRF program continues to focus on General Supplemental funding for general infrastructure projects and EC funding to address PFAS, manganese, and cyanotoxins in eligible DWSRF public water systems.

  Systems eligible for EC and LSLR funding receive direct targeted outreach via email and follow-up phone calls. Oregon continues to offer technical assistance to small public water systems to help identify unknown service lines and keep their baseline inventories up to date. Furthermore, Oregon declined FFY2022 and 2024 IIJA-LSLR funding and applied for partial FFY2023 funding. Because no public water systems regulated by state or county agencies have lead service lines, future LSLR grant applications will be evaluated based on water system needs.

- DWSRF partners at BizOR held several one-stop meetings for communities interested in pursuing financial assistance to address drinking water improvements. The DWSRF is one of many financing programs promoted at these meetings.

- DWSRF program staff contributed four articles to the ePipeline newsletter, including a summary of what the program can offer to eligible PWSs throughout Oregon. DWS also sent GovDelivery bulletins to promote the DWSRF Intended Use Plan. These notifications went to all interested parties and eligible PWSs, partners, engineering firms and the tribes. The DWSRF program has contributed to several GovDelivery announcements over the reporting period, and each was delivered to approximately 6,634 interested parties. DWS will continue to use the GovDelivery system as a major communication tool to enhance program awareness and effectiveness.

- Routine updates to the DWSRF webpage are ongoing. A few examples are the semiannual and annual updates to Project Priority Lists for public comment periods, the annual updates to the DWSRF Annual Report and Intended Use Plan, and the creation of the new IIJA program and disadvantaged community webpages.

Technical service providers

Program description and narrative

To further enhance Oregon's ability to assist water systems with identified problems and developing capacity, the DWSRF Technical Assistance set-aside is used to contract with outside technical service providers. Through Oregon's DWSRF, contracts have been established with drinking water circuit riders to provide short-term (typically 10 or fewer hours) on-site technical and engineering assistance for Community water systems serving populations under 10,000, as well as nonprofit transient and non-transient water systems. For these systems, services are free.

Under the 2022–2027 circuit rider contract, Oregon contributes state general funds to provide technical assistance to water systems that are not eligible for traditional circuit rider assistance, excepting only federally owned water systems. As above, these services are intended to provide short-term technical and engineering assistance (typically 10 or fewer hours) and are provided free of charge.

On-site technical assistance: The contractor receives requests for assistance directly from the water system, as well as requests initiated by state and county staff. Contractors perform quick

response, one-on-one technical assistance that aids in solving short-term operational problems, assists with compliance-related issues, and provides technical, managerial and financial information to system operators and administrators. Services are generally restricted to 10 or fewer hours per system without prior approval from DWS management.

DWSRF program assistance: The contractor also assists systems seeking DWSRF financing by providing pre-engineering design reports to initiate the loan process and helping systems complete the DWSRF loan application form.

The objective of the technical-assistance strategy is to expand services available to small water systems and identify and solve specific and immediate water system operational and/or management problems through timely expert help. Additionally, outreach activities can, in certain circumstances, include sample collection assistance for *Cryptosporidium* and microscopic particulate analysis (MPA) monitoring requirements as outlined below.

> *Cryptosporidium* and Microscopic Particulate Analysis (MPA) Monitoring: The Long Term 2 Enhanced Surface Water Treatment Rule (LT2) applies to all public water systems that use surface water or groundwater under the direct influence of surface water (GWUDI). The purpose of the rule is to ensure adequate treatment of surface water sources with higher levels of *Cryptosporidium*. EPA allows for the payment of the costs of LT2 monitoring for *Cryptosporidium* through the DWSRF set-asides. Surface water systems exceeding the *E. coli* triggers are referred to the technical-assistance circuit rider for assistance in determining the bin class under LT2. A part of this determination is *Cryptosporidium* sampling. Similarly, groundwater systems identified as at risk for GWUDI are targeted for MPA sampling. DWS staff may refer water systems to the circuit rider for assistance in determining GWUDI, which entails sampling by the circuit rider for determination of GWUDI or non-GWUDI status.

Activities during this reporting period

A review of invoices received during this reporting period determined that the circuit rider completed 130 technical-assistance actions for

public water systems during this reporting period, totaling $258,506.71. This includes 113 assistance actions, comprised of 35 surface water system assistance actions and 78 groundwater system assistance actions, totaling $216,360.75, which were paid for through the DWSRF Technical Assistance set asides. These services included 14 instances of assisting surface water systems with their LT2 sample collections. Additionally, 17 service activities for water systems not eligible for DWSRF support, totaling $42,145.75, were paid for via Oregon's General Fund. These services included three instances of assisting groundwater systems with their MPA sample collections.

Support services authorized by the current Circuit Rider agreement also includes asset management and project management support. Descriptions of these new services follow, but there were no activities reported for either option during this reporting period.

Project Management: Contractor shall assist water systems identified by OHA by providing project management duties for approved service actions. This service shall consist of, but is not limited to, an initial on- site evaluation and assessment of project scope and time requirements for the system, which will be presented to OHA in a written report. This review and report activity shall not exceed 10 hours without prior written approval. If the submitted proposal receives approval, the Contractor shall assume the role of project manager for the life of the approved service. OHA will authorize such service in 20-hour increments.

Asset Management: Contractor shall provide on-site technical assistance to water systems evaluating or implementing an asset management strategy or program. OHA will authorize such services in 15-hour increments.

Capacity building by DWS staff

Program description and narrative

Integration of capacity-building outreach into day-to-day DWS activities is key to the successful resolution of identified capacity-related deficiencies. Field staff are familiar with available technical-assistance resources and provide direct assistance to water systems during sanitary survey activities, water treatment plant visits, water

quality investigations and associated technical consultation and outreach. Staff use a wide variety of tools and resources to help systems address identified capacity deficiencies, including direct technical assistance in person and over the phone; handouts, factsheets and training guides; referrals to resources on the DWS website; and referrals to funding partners and outside technical assistance and training providers. Water systems in violation or with water quality test results indicating a potential public health concern are contacted directly by staff and technical assistance is provided. Water systems needing help to build capacity for emergency response are provided resources and technical assistance to better prepare for continued operation.

Activities during this reporting period

DWS staff devoted more than 15,000 hours to technical assistance and outreach activities for water systems to assist them in maintaining compliance with the Safe Drinking Water Act. Those hours were billed to the Capacity Development set-aside. Additional outreach is paid from other state and federal funding sources.

DWS staff gave 12 presentations to water system operators and decision makers addressing the areas of service line inventory, asset management, operator certification, emerging contaminants, compliance and financial resources throughout Oregon.

Surface water treatment plant inspections

Program Description and Narrative

DWS staff evaluate surface water treatment plant facilities and operations during each water treatment plant visit, and based on the evaluation, establish a future visit frequency of six months, one year or three years. The systems at highest risk are prioritized for receiving targeted performance improvement assistance to better address capacity issues. This process is an example of how DWS integrates capacity building into existing activities. These inspections provide an opportunity for staff to ask questions and discuss concepts related to optimization of treatment processes, including optimization goals established through Oregon's Area-Wide Optimization Program.

Activities during this reporting period

DWS conducted 25 surface water treatment plant visits during the reporting period.

Area-Wide Optimization Program (AWOP)

Program description and narrative

The objective of Oregon's AWOP Program is to educate water system operators about optimization principles with the goal of improving public health protection. This is accomplished by training water system staff in the basics of water treatment and the multiple barrier concept, providing the opportunity and incentive to learn about and engage in optimizing treatment beyond regulatory standards, and using data to monitor performance and identify areas for improvement.

Activities during this reporting period

AWOP activities for the reporting period consisted of virtual trainings previously described in Focus Area 3 – Training. AWOP team members also promoted optimization concepts by participating in various committees with the purpose of sharing AWOP data management strategies with other states, developing optimization goals for corrosion control, researching post-wildfire impacts to drinking water systems, and helping to ensure optimization concepts for membrane and slow sand filtration are incorporated into nationally recognized standards and publications.

AWOP activities included the following:

- Assisted ten communities along the North and South Santiam Rivers in optimizing treatment and preparing for high turbidity events as a result of deep drawdowns of reservoirs initiated by the U.S. Army Corps of Engineers to meet court-mandated fish passage requirements. AWOP provided on-site assistance to four water systems and regularly participated in preparedness meetings.
- Assisted with research of post-wildfire impacts to drinking water systems.

- Gave a one-hour presentation on coagulation optimization at the Pacific Northwest Section – American Water Works Association Conference on July 9, 2024.

Source Water Protection Implementation Project

Program description and narrative

Both the Oregon Department of Environmental Quality and DWS continue to provide timely technical assistance to Community water systems that will ultimately result in voluntary implementation of source water protection strategies in response to local source water characteristics and vulnerabilities. This capacity development effort uses source water assessment information to communicate source vulnerability risks to water system operators and decision makers with the goal of increasing overall capacity. This effort primarily assists water systems with managing risks and technical resources as they plan for funds to develop or maintain protection of their drinking water sources.

Through the DWSRF loan program, loans (up to $100,000 per water system) and grants (up to $50,000 per water system) are made available annually to water systems for source water protection projects or activities. Each year, DWS awards approximately $200,000 in grants and loans. Awards fund projects for individual water systems and joint projects involving multiple water systems. Joint projects can be funded with grant money up to $50,000 per each participating water system, thus encouraging water systems to collaborate on source water protection strategies that target regional risks to drinking water quality.

For SFY 2025, in addition to the annual loans and grants program for source water protection projects, Oregon made use of $500,000 in IIJA Supplemental funds for source water protection projects, specifically to support land acquisition planning projects (up to $70,000 per water system) that will enable several Community water systems to identify land within their source area for eventual purchase and implementation of source water protection practices.

The DWS application ranking process places an emphasis on providing funds to disadvantaged communities. For SFY 2025, projects were first scored for eligibility. Then all eligible projects

submitted by disadvantaged communities were credited with 10 additional points before the projects were ranked.

Activities during this reporting period

For SFY 2025, DWS received eighteen applications for drinking water protection projects with a total of $768,500 in eligible requests (two projects were determined to be ineligible for funding). Fifteen of the applications were from water systems dependent on surface water and three applications were from water systems dependent on groundwater for their drinking water sources. Eleven of the scored applications were from disadvantaged communities; ten of those were selected for funding. The average application request for land acquisition planning projects was $67,857, while the average application request for more traditional source protection projects was nearly $46,000. DWS approved twelve projects with a total funding of $681,500. The primary focus of the selected projects included the following:

- Land acquisition (conservation) planning within the source area for future purchase and implementation of source protection practices
- Stream restoration, river clean-up projects, and security fencing of highly sensitive areas.
- Development of plans such as drinking water source protection, geographic spill response, and post-wildfire recovery plans.
- Purchase of spill response materials and equipment needed for implementation of spill response strategies and training.

2. *Based on the existing strategy, how has the state continued to identify systems in need of capacity development assistance*?

DWS identifies systems in need of capacity development assistance continuously in three primary ways:

- Using a violation system score list (i.e., ETT) to identify systems with compliance issues
- Identifying issues during sanitary surveys and water treatment plant visits

- Noting problems during AWOP activities

3. ***During the reporting period, if statewide PWS capacity concerns or capacity development needs (TMF) were identified, what was the state's approach in offering and/or providing assistance?***

   Water system violations generated monthly by DWS continue to point to water quality monitoring and reporting as a statewide capacity issue. Systems in violation are contacted directly by DWS or county/Department of Agriculture staff, and technical assistance is provided in an effort to resolve identified compliance issues.

   Additionally, sanitary surveys conducted within the reporting period continue to identify deficiencies in required water system documentation.

   The five deficiencies most frequently identified during sanitary surveys conducted within the last SFY are the following:

   - No operations and maintenance manual – Management & Operations Violations
   - No coliform sampling plan – Monitoring & Reporting Violations
   - Monitoring not current – Monitoring & Reporting Violations
   - No certified operator at required level – Operator Certification Violations
   - Emergency response plan not completed – Management & Operations Violations

   To aid in correcting these deficiencies, DWS and county/Department of Agriculture staff provide on-site technical assistance and distribute factsheets describing the correct methodology for completing these required documents. The DWS Data Management, Compliance & Enforcement Unit tracks when corrections are due.

   DWS staff provide on-site technical assistance and, in many cases, refer these systems to the technical and managerial assistance circuit riders for further assistance.

4. ***If the state reviewed the implementation of the Existing Systems***

Strategy during the previous year, discuss the review and how findings have been or may be addressed.

DWS continues to review and discuss the continued implementation of the revised strategy. As noted in previous annual reports, Oregon strives to identify the highest value activities and focus efforts there accordingly.

5. ***Did the state modify the Existing Systems Strategy? If so, describe.***

Oregon has an EPA-approved Existing Systems Strategy that includes the new asset management requirements. The revised strategy is being implemented and is publicly available at Oregon's dedicated Capacity Development webpage in the Posted Reports section.

This document is available in other languages, large print, braille, and other formats free of charge. Contact Phebe Howe at Phebe.H.Howe@oha.oregon.gov or 541-556-3341 (voice/text). OHA accepts all relay calls.