
Reminders and Updates

Fall Regional Training

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October 17, 2018

PUBLIC HEALTH DIVISION
Drinking Water Services

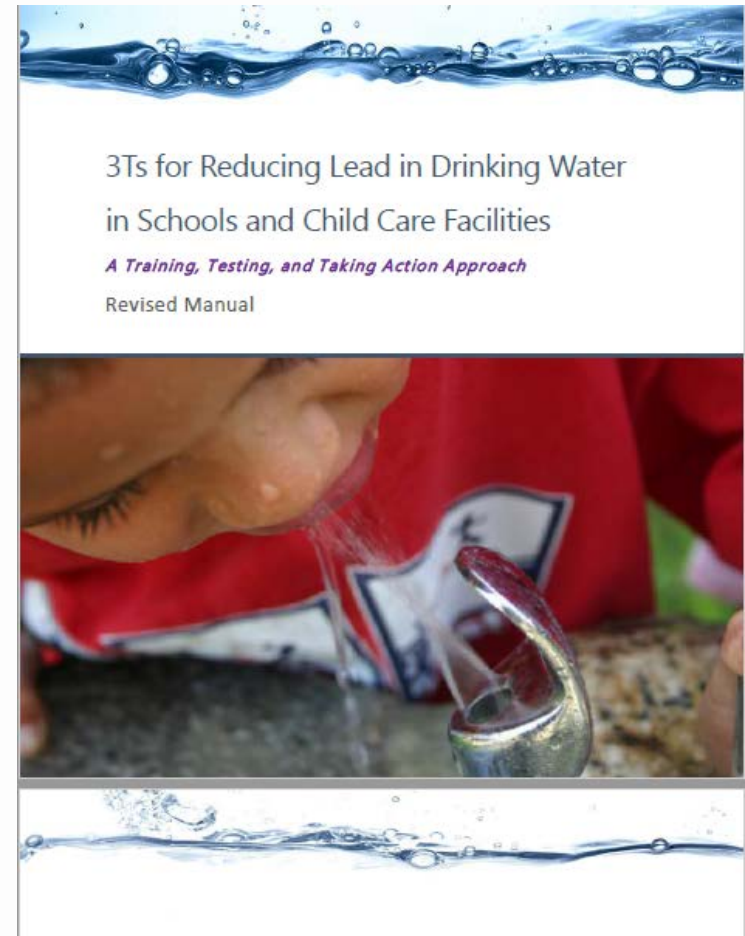
Oregon
Health
Authority

Lead in Schools

- Stakeholder group with Dept of Education
- Proposed rules September 20th
 - Sample at taps used for drinking and food preparation
 - Post 2014 construction excluded
 - Sample every 6 years
 - Mitigate if greater than 15 ppb (replace faucet, treat)
- Comments due by October 26th
- Final Rule by November 28th

Lead in Schools cont'd

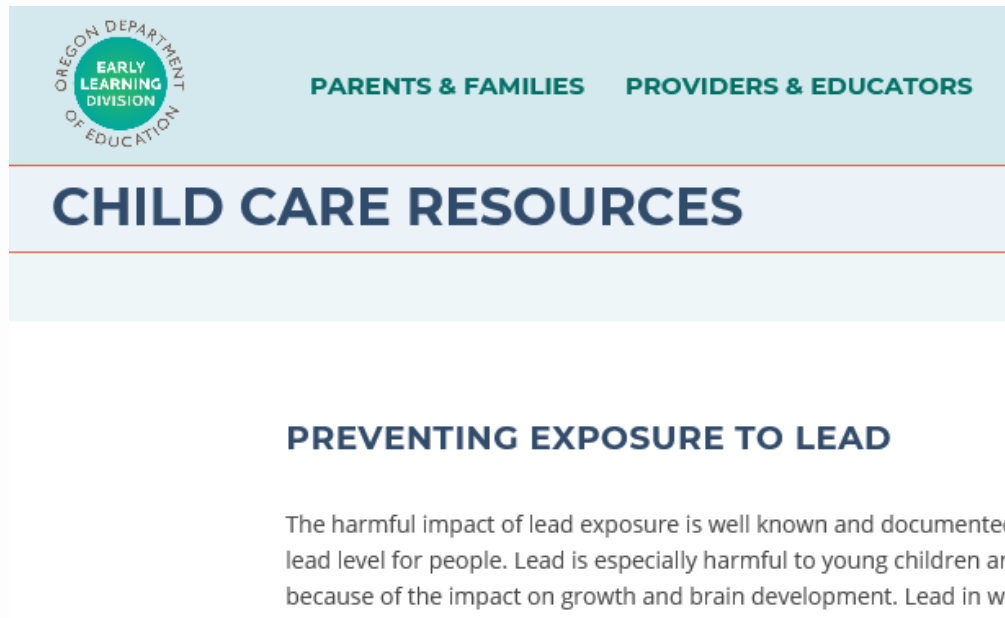
- ODE will implement and enforce
- State will pay for testing costs
- Stagger schools to test over a 6-year period
- EPA's 3Ts guidance revised in October 2018!
 - No set mitigation level



Lead testing in child care facilities

- Early Learning Division of ODE adopted rules in 2018
- Must test by September 30, 2018 and every 6 years
- <https://oregonearlylearning.com/lead-poisoning-prevention/>

ELD Contact:
503-947-5908



The screenshot shows the Oregon Department of Education Early Learning Division website. The header includes the logo for the Oregon Department of Education Early Learning Division and navigation links for 'PARENTS & FAMILIES' and 'PROVIDERS & EDUCATORS'. The main heading is 'CHILD CARE RESOURCES'. Below this, there is a section titled 'PREVENTING EXPOSURE TO LEAD' with a paragraph of text: 'The harmful impact of lead exposure is well known and documented lead level for people. Lead is especially harmful to young children an because of the impact on growth and brain development. Lead in w:

What to do when you get Chuck's email: Violations

The violations for XXX have been validated. The violations included both MCL and M&R violation types. These are viewable on the violations page at <http://yourwater.oregon.gov/violcounty.php>. If you have any questions or think a violation is in error you can contact me at the number below. I will generate the mailing list for the violation postcards next week. The Auto RTC process has also been run. **Please review your PNC list at <http://yourwater.oregon.gov/sscore.php> and open compliance schedules at <https://yourwater.oregon.gov/compliance.php>.**

- Check Violations: Can any be RTCd?
 - Any incorrect?
 - Manual: Higher points / health threat / human review needed
 - Auto-RTC is based on monitoring results
 - Email to compliance in-box (Webform soon)

What to do when you get Chuck's email: PNC list

- Any approaching 3 months?
- Check to see if any violations can be RTC'd
- If can be resolved in 3 more months: 😊
- If not, refer to formal enforcement
- Contact report / Email to Compliance in-box via webform

Color-coding and abbrev at the

Primary Source	# Months PNC [‡]	System Score	
GW	6	82	
GW	6	21	
SW	5	102	
GW	5	16	
GW	3	21	

Use Webform to email Compliance In-box

- Regulatory & Compliance:
 - PNC updates
 - Informal compliance schedules
 - Enforcement
 - Violation RTC soon

The screenshot shows the Oregon Public Health Drinking Water Data Online webform interface. At the top, there is a dark blue header with a water drop icon and the text "Oregon Public Health Drinking Water Data Online". Below the header is a navigation menu with links: "Introduction :: Data Search Options :: WS Name Look Up :: WS ID Look Up :: DWS Home". A secondary menu highlights "Web Form Menu :: Contact Reports :: Advisories :: Deficiencies". The main content area is titled "Contact Report Entry" and displays "PWS NUMBER: OR41 [99999](#) - HALL OF FAME TEST SYSTEM". A yellow box contains the text "Does SDWIS need to be updated?" followed by a button labeled "Email Compliance Inbox". Below this box, a link is provided: "This contact report can be viewed publicly at this link: <https://yourwater.oregon.gov/cr-detail.p>".

Informal Compliance Schedules

- When a system gets a new health-based violation or issue, consider the appropriate corrective action and how long it might take.
 - High nitrate → treatment
 - Confirmed EC+ in the source → reconstruction or 4-log
 - Versus temporary problem quickly fixed
- If a new compliance schedule is needed and will be resolved beyond 6 months, need to refer to formal enforcement for a BCA or AO (Webform)
- DWS-generated letters will be sent, but to begin enforcement conversation.

Coliform Investigations

- For Level 1 investigations, remember to review form, approve on form or email when sending to DMCE
 - Completeness
 - Statement of cause reasonable (unknown is ok if no defects found)?
 - Corrective action schedule reasonable/ specific?
- When it's ok to do a phone Level 2 investigation:
 - If the presence of coliforms have a known cause with future date of correction; OR
 - A recent site visit has been conducted
 - Still need to fill out and submit form

Coliform Investigations

- If a Level 2 investigation is triggered by a second Level 1, you may be able to convert it to a Level 1 investigation if:
 - The cause of the problem was clearly identified in the first Level 1 investigation and documented on the form; and
 - That situation was previously documented as being corrected.
- In other words, you are assured that there is a new situation not related to the previous situation.
- If determined, email DMCE compliance in-box asking to change it to a Level 1 for these reasons.
- OAR 333-061-0078(2)(b)(B)

Email reminders

- Two weeks before and one month after a deadline
 - Compliance schedule due dates
 - Deficiency correction due dates
 - Coliform investigation due date
- Contact system to make sure they are working on it.
Does schedule need to be adjusted?
- Write contact report if new information (when they say they will have it done by)
- **How is this working for you?**

Non-EPA systems

- Violations are being issued as of January 2018
 - In SDWIS
 - No postcard
- Can select to show on system score page
- Helps understand status of non-EPA systems
- **Partner responsibilities:** respond to alerts only!
 - TC/EC+
 - High Nitrate
 - Always discuss rule requirements; no need to discuss our ability to enforce

Non-EPA systems: Program Element

(14) Summary of Required Services Based on Water System Type

	CWS	NTNC	TNC	Non-EPA
Independent Enforcement Actions	X	X	X	
Computerized Drinking Water System Data Base	X	X	X	X
Technical and Regulatory Assistance	X	X	X	X
Investigation of Water Quality Alerts	X	X	X	X
Conduct Level 2 Coliform Investigations	X	X	X	X*
Water System Surveys	X	X	X	
Resolution of Priority Non-compliers (PNC)	X	X	X	
Level 1 Coliform Investigation Review	X	X	X	
Water System Survey Significant Deficiency Follow-ups	X	X	X	
Enforcement Action Tracking and Follow-up	X	X	X	X*
Resolution of Monitoring and Reporting Violations	X	X	X	
Inventory and Documentation of New Water Systems	X	X	X	X

*E.coli only

Failure to correct deficiency letter

- If corrective action is past due:
 - Send letter for ALL uncorrected deficiencies, copy to DWS
 - Refer priority deficiencies to formal enforcement if not corrected

[PWS CONTACT]
[PWS ADDRESS]

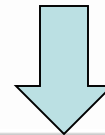
**Re: Water System Survey Significant Deficiencies/Rule Violations
[PWS NAME], [PWS NUMBER]**

Dear [PWS CONTACT]:

The [PWS NAME] was to complete corrective action by [+18 WEEKS FROM SURVEY LETTER DATE] or have a Department-approved corrective action plan with a reasonable timeframe to complete the corrective action. To date, this information has not been received. As a result, the [PWS NAME] is in violation and is now subject to formal enforcement which could include the assessment of civil penalties. 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 [+30 DAYS FROM LETTER DATE]**. Please send information to: [DWP/COUNTY CONTACT NAME AND ADDRESS]. A copy of the survey letter is enclosed for your reference.

Failure to correct deficiency letter

- Webform: new field for reminder letter date



Category	Deficiency	Initial Due Date (from letter)	Failure to Correct Deficiencies Letter Sent	Revised Due Date (corrective action plan)	Resolved Date
Well Construction	No raw water sample tap	1/7/2015		1/7/2019	
Well Construction	No treated sample tap (if applicable)	1/7/2015		1/7/2019	
Disinfection	DPD or EPA approved method not used	1/7/2015	7/31/2018		
Disinfection	Chlorine not measured & recorded as required	1/7/2015	7/31/2018		
Finished Water	Hatch not locked or	1/7/2015	7/31/2018		

Emailing us

- Use the compliance in-box **ONLY**

For ALL your drinking water needs

Compliance.dw@state.or.us

- The other email address that shall not be named is **ONLY FOR DATA** from labs or water systems!
 - Delete it from your contacts if necessary

Questions / Discussion?