

Violations & Follow up

What was the problem?

What are the Next Steps?

How to Resolve Compliance Problems?

Agenda:

- Violations: What Happened & Should I Do Anything?
- System Scores & PNCs: Watch to Keep Those Scores Low!
- RTC'ing Violations: When & How
- Compliance Schedules: Responsibilities to Update



OH Boy! MAIL FROM CHUCK!



cool, new Violations – Let's see what's up

Reply Reply All Forward IM

Wed 9/18/2019 8:42 AM



Michael Charles E

New violations online

To: DANIELS Bradley K; Spielman Abbie; Baird Gregg C; Byrd Michelle P; Clemons Carolyn M; Cunningham-Golik Zachariah; Farrelly Peter R; GENTRY Carrie L; GOSS William H; Hofeld Evan E; HOUGH Daniel L; Kazmierczak Russell A; LYON Casey; Macpherson James R; Nusrata James B; Parry Betsy L; PATTEE Tom; Rich Paula J; Salis Karyl L; Stevenson Shawn P; Templin Rebecca A; Word Amelia A; Wray Julie L; marcy.dailey@co.benton.or.us; Megan Watts; Scott, KRUGER; joelfer@co.clackamas.or.us; meredith reiley; Michael McNickle; Erin O'connell; Kevin Hesson; Mike Paul; Peter Cooley (pcooley@chw.coos.or.us); rick hallmark;

Cc: Panwhar Samina T

The coliform violations for August just have been validated. The violations included 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. The remainder of the violations will be issued later this month and postcards sent after that.

Chuck Michael
Compliance Officer
OREGON HEALTH AUTHORITY
Public Health Division
Drinking Water Services
971-673-0420
www.healthoregon.org/dwp

What's In My County?

Violation Search Criteria

County

Regulating Agency
☒ All Agencies
☐ County
☐ State
☐ Dept. of Agriculture

Violation Status
☒ Unaddressed
☐ Under enforcement
☐ Returned to compliance

Issued Date Range*
From to

☐ Include non-EPA (state regulated) systems

**The default date range is the last three weeks. Search results are based on the date the violation was issued. Search results are based on the date the violation was issued over the past five years. Systems that are currently inactive are not shown.*

[New search](#)

Violations (Active systems only)

Modify Search

County/Region:	Crook
Regulating Agency:	All Agencies
Issued Date Range:	09/05/2019 to 09/26/2019
Violation Status:	Unaddressed
Violation Count:	0
<i>Non-EPA (state-regulated) systems excluded.</i>	

No violations for selected criteria

Score!!

MORE LIKELY

Violations (Active systems only)

Modify Search

County/Region: Douglas
Regulating Agency: County
Issued Date Range: 09/05/2019 to 09/26/2019
Violation Status: Unaddressed
Violation Count: 6

Non-EPA (state-regulated) systems excluded.

Group Abbreviations:
GWR = Ground Water Rule, TCR = Total Coliform Rule

PWS	PWS Name	System Type	Population Served	Analyte Group	Violation Type	Points	Auto-Report	Go To Related Pages
95515	DOUGLAS CO PK-KANIPE MEMORIAL EQUESTRIAN	NC	30	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
94912	DOUGLAS CO PKS - KANIPE MEMORIAL	NC	50	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
92117	IDLEYLD LODGE	NC	25	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
93442	RANCH MOTEL	NC	50	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
92133	SMITH RIVER MARINA	NC	28	GWR	Monthly GW Compliance Report - Late/Nonreporting	1	N	Violations page
92114	WELLS CREEK INN	NC	25	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page

Look for Patterns or something amiss to correct as soon as possible

Violations are displayed for the last 5 years only.

Group Abbreviations: GWR = Ground Water Rule, TCR = Total Coliform Rule

Gray shading indicates return to compliance.

[Hide Auto-RTC](#) | [Show Determination Dates](#)

[Click here](#) to see public notices.

Violation History								
Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count Show analytes for all violations	Enforcement Action - Date Show history	Points
Begin	End							
901499521	Y	Aug 01, 2019	Aug 31, 2019		TCR	Routine Coliform - Did Not Report ANY - 1		1
901499520	Y	Jul 01, 2019	Jul 31, 2019		TCR	Routine Coliform - Did Not Report ANY - 1		1
901499519	Y	Jun 01, 2019	Jun 30, 2019		TCR	Routine Coliform - Did Not Report ANY - 1		1
901499514	N	Apr 05, 2017	Apr 16, 2017	DIST-A	GWR	Source Sample - Late/Nonreporting - 1	Returned To Compliance - Apr 17, 2017	1

HMM, MIGHT WANT TO TALK TO THESE GUYS... AND IF YOU
DO – MAKE A CONTACT REPORT!

Other coliform violations

Regulating Agency	PWS	PWS Name	System Type	Population Served	Analyte Group	Violation Type	Points	Auto-RTC ?	Go To Related Pages
EXAMPLE COUNTY	92xx	WHATSIT COMMUNITY CHURCH	NC	100	GWR	Monthly GW Compliance Report - Late/Nonreporting	1	N	Violations page
EXAMPLE COUNTY	95xx	CAMP KNOW WHERE	NC	60	GWR	Source Sample - Late/Nonreporting	1	N	Violations page

“LATE/NON-REPORTING”?
UM, CAN YOU BREAK THAT DOWN?

Was the GWR 4-Log Report LAtE,
or not turned in at all?

For further information on this public water system, click on the area of interest below:

[System Info](#) :: [Report for Lenders](#) :: [Alerts](#) :: [Violations](#) :: [Compliance & Enforcement](#) :: [Contacts & Advisories](#) :: [Site Visits](#) :: [Public Notice](#)

[Coliform Summary](#) :: [Coliform Results](#) :: [Sampling Schedule for Coliform](#) :: [Groundwater/GWUDI Source Details](#) :: [Plan Review](#)

[Chemical Group Summary](#) :: [Latest Chemical Results](#) :: [Entry Point Detects](#) :: [Single Analyte Results](#)

[Chemical Schedule Summary](#) :: [Chemical Schedule Details](#)

[Lead & Copper](#) :: [Corrosion Control \(LCR\)](#) :: [Nitrate](#) :: [Arsenic](#) :: [Radionuclides](#) :: [GWR 4-Log](#) :: [LT2](#) :: [Cyanotoxins](#)

[DBPs](#) :: [TOC & Alkalinity](#) :: [DBP Sample Sites](#) :: [FANLs](#) :: [MRDL](#) :: [Turbidity](#) :: [SWTR](#) :: [RAA](#) :: [LRAA](#)

For SDWIS: 1

OK, Minor Screw-UP,
can probably let that go

Monitoring Period	Received	Entry Point	Required Disinfection Met	Hours Below Minimum	Report Status
Jan 01, 2019	Feb 19, 2019	WTP-B	Y	0.00	
Dec 01, 2018	Jan 04, 2019	WTP-B	Y	0.00	
Nov 01, 2018	Dec 04, 2018	WTP-B	Y	0.00	
Oct 01, 2018	Nov 05, 2018	WTP-B	Y	0.00	
Sep 01, 2018	Oct 01, 2018	WTP-B	Y	0.00	

And the second one...

Regulating Agency	PWS	PWS Name	System Type	Population Served	Analyte Group	Violation Type	Points	Auto-RTC ?	Go To Related Pages
EXAMPLE COUNTY	92xx	WHATSIT COMMUNITY CHURCH	NC	100	GWR	Monthly GW Compliance Report - Late/Nonreporting	1	N	Violations page
EXAMPLE COUNTY	95xx	CAMP KNOW WHERE	NC	60	GWR	Source Sample - Late/Nonreporting	1	N	Violations page

HOW WOULD YOU DETERMINE
WHICH PROBLEM IT WAS HERE?

Regulating Agency	PWS	PWS Name	System Type	Population Served	Analyte Group	Violation Type	Points	Auto-RTC ?	Go To Related Page
EXAMPLE COUNTY	92x xx	WHATSIT COMMUNITY CHURCH	NC	100	GWR	Monthly GW Compliance Report - Late/Nonreporting	1	N	Violations page
EXAMPLE COUNTY	95x xx	CAMP KNOW WHERE	NC	60	GWR	Source Sample - Late/Nonreporting	1	N	Violations page

COULD BE A MISSING OR LATE:

- TRIGGERED SOURCE SAMPLE, OR
- ANNUAL/ MONTHLY SOURCE SAMPLE

[Hide Auto-RTC](#) | [Show Determination Dates](#)

[Click here](#) to see public notices.

Violation History								
Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count		Enforcement Action - Date
		Begin	End			Show analytes for all violations		Show history
3315216	N	Sep 24, 2019	Oct 05, 2019	DIST-A	GWR	Source Sample - Late/Nonreporting - 1		1
3315215	Y	Jul 01, 2018	Sep 30, 2018		TCR	Routine Coliform - Did Not Report ANY - 1		Returned To Compliance - Oct 03, 2018 1

- The monitoring period on the violations Page tells you which kind of source sample
- AND THE COLIFORM RESULTS PAGE WILL SHOW IF A SAMPLE WAS SUBMITTED, BUT LATE

What If You See This?

[Hide Auto-RTC](#) | [Show Determination Dates](#)

[Click here](#) to see public notices.

Violation History

Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count Show analytes for all violations	Enforcement Action - Date Show history	Points
		Begin	End					
3311235	Y	Apr 01, 2019	Jun 30, 2019		TCR	Routine Coliform - Did Not Report ANY - 1		1
3311234	Y	Jul 01, 2018	Sep 30, 2018		TCR	Routine Coliform - Did Not Report ANY - 1	Returned To Compliance - Dec 28, 2018	1

...CRUISIN' FOR A BRUISIN'

Criteria to increase from quarterly to monthly monitoring

- A level 2 coliform investigation is triggered
- Violation for exceeding the maximum contaminant level for E. coli
- Violation for not completing and reporting a coliform investigation by due date
- Violation for not correcting sanitary defects found during a coliform investigation by approved due date
- Two violations for routine coliform monitoring (for not reporting a required sample on time) w/in the last 12 months
- A level 1 coliform investigation is triggered and one violation for routine coliform monitoring w/in the last 12 months



Can I do
anything to
make it up to
you?

Opportunity letter

Your water system has missed reporting quarterly sample results twice within the last year. This will cause your coliform monitoring schedule to be increased to once every month unless you do the following:

- Collect the make-up sample before the end of this month and report it by the 10th of next month.
- Collect the normal quarterly sample by the end of the quarter and report it within 10 days of the end of the quarter.

*These samples must also be collected at least one week apart and marked as routine samples.

Failure to collect and report both of these samples on time or meeting any of the other criteria in OAR 333-061-0036(6)(b)(C) will result in coliform monitoring being increased to monthly at your water system.



opportunity letter.4-11-19.xlsx
14 KB

The coliform violations for March and 1st Quarter have been validated. The violations included 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. The remainder of the violations will be issued later this month and postcards sent after that.

Attached is the list of systems getting the opportunity to stay on quarterly monitoring letter. These systems just received a violation and have their 2nd quarterly violation in the last year. The system needs to collect a coliform sample this month (and report by the 10th of next month) and a 2nd sample sometime this quarter (at least 1 week after the first sample). Failure to both of these steps will result in them changing to a monthly schedule.

Chuck Michael

Compliance Officer
OREGON HEALTH AUTHORITY
Public Health Division
Drinking Water Services
971-673-0420
www.healthoregon.org/dwp

Bottom Line, when you see this

[Hide Auto-RTC](#) | [Show Determination Dates](#)

[Click here](#) to see public notices.

Violation History								
Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count	Enforcement Action - Date	Points
		Begin	End			Show analytes for all violations	Show history	
3311235	Y	Apr 01, 2019	Jun 30, 2019		TCR	Routine Coliform - Did Not Report ANY - 1		1
3311234	Y	Jul 01, 2018	Sep 30, 2018		TCR	Routine Coliform - Did Not Report ANY - 1	Returned To Compliance - Dec 28, 2018	1

OR THIS

[Hide Auto-RTC](#) | [Show Determination Dates](#)

[Click here](#) to see public notices.

Violation History								
Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count Show analytes for all violations	Enforcement Action - Date Show history	Points
1082914	Y	Aug 01, 2019	Aug 31, 2019		TCR	Temporary Routine Coliform - Did Not Report ANY - 1		1
1082912	N	Jan 01, 2014	Dec 31, 2014	SRC-AA	GWR	Source Assessment Sample - Late/nonreporting - 1	Returned To Compliance - Aug 25, 2015	1

SYSTEM SCORE SUMMARY

Unaddressed Points: 1

IT might Be Worth A Call
to Save Grief Later on

WHY IN EACH CASE?

What Would you Say Here?

[Hide Auto-RTC](#) | [Show Determination Dates](#)

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Violation History								
Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count	Enforcement Action - Date	Points
		Begin	End			Show analytes for all violations	Show history	
3311235	Y	Apr 01, 2019	Jun 30, 2019		TCR	Routine Coliform - Did Not Report ANY - 1		1
3311234	Y	Jul 01, 2018	Sep 30, 2018		TCR	Routine Coliform - Did Not Report ANY - 1	Returned To Compliance - Dec 28, 2018	1

OR HERE?

[Hide Auto-RTC](#) | [Show Determination Dates](#)

[Click here](#) to see public notices.

Violation History								
Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count Show analytes for all violations	Enforcement Action - Date Show history	Points
		Begin	End					
1082914	Y	Aug 01, 2019	Aug 31, 2019		TCR	Temporary Routine Coliform - Did Not Report ANY - 1		1
1082912	N	Jan 01, 2014	Dec 31, 2014	SRC-AA	GWR	Source Assessment Sample - Late/Nonreporting - 1	Returned To Compliance - Aug 25, 2015	1

SYSTEM SCORE SUMMARY

Unaddressed Points: 1

WHICH ones have “opportunity” to remain quarterly?

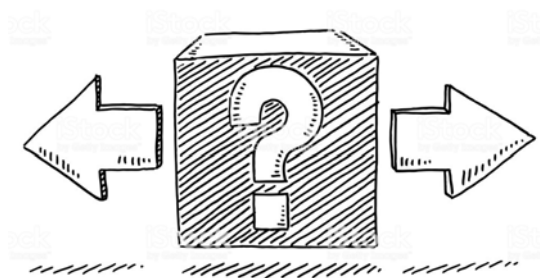
Yes

If there are 2 violations for not reporting routine coliform results in the last year...

No

Both violations are for not reporting quarterly routine samples

Opportunity to stay on quarterly



One or both violations are for not taking enough **temporary routines**

Monthly monitoring



A FEW DAYS LATER...

What, Another
Email From
Chuck?
(or Abbie)





Thu 9/19/2019 2:41 PM

Michael Charles E

violations online

To: Panwhar Samina T; DANIELS Bradley K; Spielman Abbie; Baird Gregg C; Byrd Michelle P; Clemons Carolyn M; Cunningham-Golik Zachariah; Farrelly Peter R; GENTRY Carrie L; GOSS William H; Hofeld Evan E; HOUGH Daniel L; Kazmierczak Russell A; LYON Casey; Macpherson James R; Nusrata James B; Parry Betsy L; PATTEE Tom; Rich Paula J; Salis Karyl L; Stevenson Shawn P; Templin Rebecca A; Word Amelia A; Wray Julie L; marcy.dailey@co.benton.or.us; Megan Watts; Scott, KRUGER; joelfer@co.clackamas.or.us; meredith reiley; Michael McNickle; Erin O'connell; Kevin Hesson; Mike Paul; Peter Cooley (pcooley@chw.coos.or.us);

i You forwarded this message on 9/19/2019 3:18 PM.

Action Items

The violations for August have been validated. The violations included both MCL and M&R violation types. These are viewable on the violations page <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 PTC 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>.**

Chuck Michael

Compliance Officer

OREGON HEALTH AUTHORITY

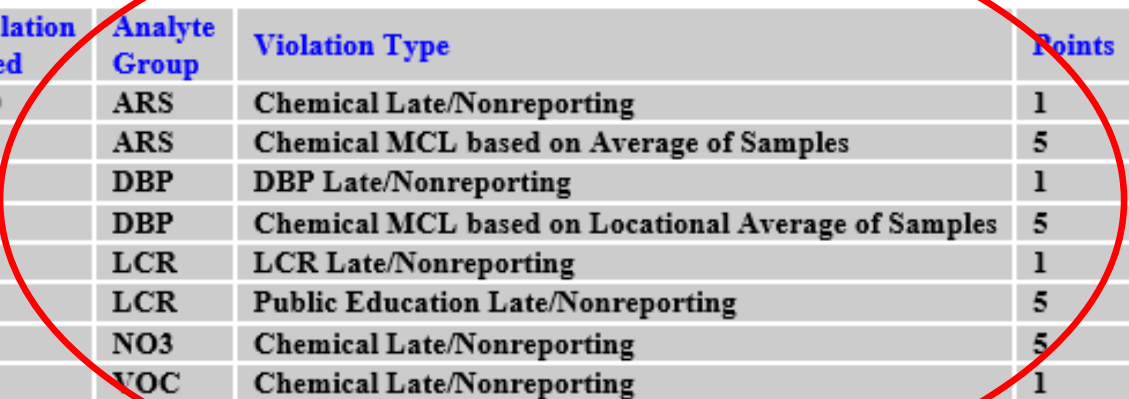
Public Health Division

Drinking Water Services

971-673-0420

www.healthoregon.org/dwp

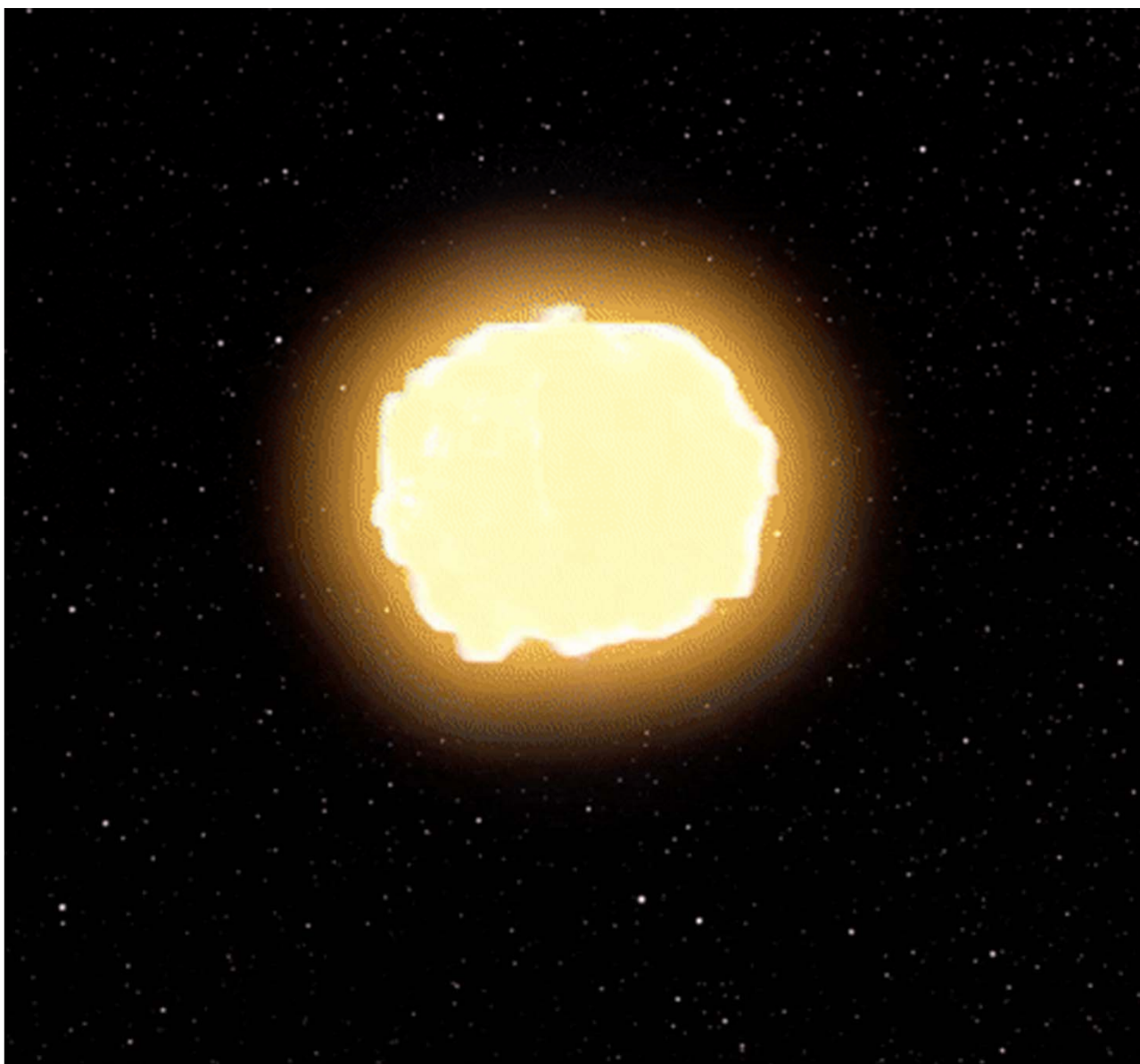
CHEMICAL VIOLATION INFO IN THE VIOLATION SUMMARY SCREEN



System Type	Population Served	Analyte Group	Violation Type	Points	Auto-RTC?	Go To Related Pages
NTNC	2,100	ARS	Chemical Late/Nonreporting	1	Y	Violations page
C	60	ARS	Chemical MCL based on Average of Samples	5	N	Violations page
C	75	DBP	DBP Late/Nonreporting	1	Y	Violations page
C	200	DBP	Chemical MCL based on Locational Average of Samples	5	N	Violations page
C	750	LCR	LCR Late/Nonreporting	1	Y	Violations page
C	100	LCR	Public Education Late/Nonreporting	5	N	Violations page
NTNC	69	NO3	Chemical Late/Nonreporting	5	Y	Violations page
C	90	VOC	Chemical Late/Nonreporting	1	Y	Violations page

Common acronyms:





JUST FOR GRINS... Non-EPA system Violations



NP	20	NO3	Chemical Late/Nonreporting	5	Y	Violations page
NP	20	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
NP	18	NO3	Chemical Late/Nonreporting	5	Y	Violations page
NP	20	NO3	Chemical Late/Nonreporting	5	Y	Violations page
NP	20	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
NP	16	NO3	Chemical Late/Nonreporting	5	Y	Violations page
NP	17	GWR	Monthly GW Compliance Report - Late/Nonreporting	1	N	Violations page
NP	17	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
NP	15	NO3	Chemical Late/Nonreporting	5	Y	Violations page
NP	15	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
NP	15	NO3	Chemical Late/Nonreporting	5	Y	Violations page
NP	12	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
NP	15	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
NP	15	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page
NP	12	NO3	Chemical Late/Nonreporting	5	Y	Violations page
NP	12	TCR	Routine Coliform - Did Not Report ANY	1	Y	Violations page

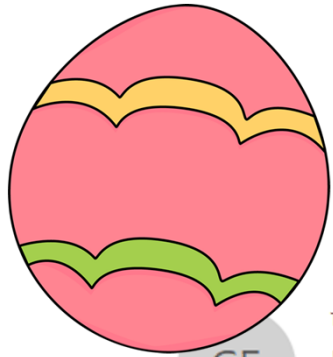
After the end of one-year or 3-year monitoring period...?

Violation History								
Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count		Points
		Begin	End			<i>Show analytes for all violations</i>		
902570683	Y	Jan 01, 2014	Dec 31, 2016	EP-A	VOC	Chemical Late/Nonreporting - 21	Show analytes	1
902570662	Y	Jan 01, 2014	Dec 31, 2016	EP-A	SOC	Chemical Late/Nonreporting - 29	Show analytes	1
902570633	Y	Jan 01, 2014	Dec 31, 2016	EP-A	IOC	Chemical Late/Nonreporting - 12	Show analytes	1
902570621	Y	Jan 01, 2014	Dec 31, 2016	EP-A	ARS	Chemical Late/Nonreporting - 1		1
902570619	Y	Jan 01, 2016	Dec 31, 2016	EP-A	NO3	Chemical Late/Nonreporting - 1		5

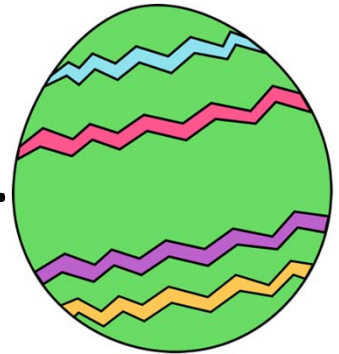
...You Might get A Bumper Crop of Violations

questions on Reviewing Violations?





Remember Chuck's Email? MoRe EaSter Eggs to find there..



Thu 9/19/2019 2:41 PM

CE

Michael Charles E



violations online

To: Panwhar Samina T; DANIELS Bradley K; Spielman Abbie; Baird Gregg C; Byrd Michelle P; Clemons Carolyn M; Cunningham-Golik Zachariah; Farrelly Peter R; GENTRY Carrie L; GOSS William H; Hofeld Evan E; HOUGH Daniel L; Kazmierczak Russell A; LYON Casey; Macpherson James R; Nusrata James B; Parry Betsy L; PATTEE Tom; Rich Paula J; Salis Karyl L; Stevenson Shawn P; Templin Rebecca A; Word Amelia A; Wray Julie L; marcy.dailey@co.benton.or.us; Megan Watts; Scott, KRUGER; joelfer@co.clackamas.or.us; meredith reiley; Michael McNickle; Erin O'connell; Kevin Hesson; Mike Paul; Peter Cooley (pcooley@chw.coos.or.us);

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Chuck Michael
Compliance Officer
OREGON HEALTH AUTHORITY
Public Health Division
Drinking Water Services
971-673-0420
www.healthoregon.org/dwp



PNCs = “Persistent Non-Compliers”

EPA’S THRESHOLD FOR STARTING ENFORCEMENT ACTION

PNCs are Defined by System Scores:

- Each violation is given a point value based on severity. Generally, Violations for:
 - Public Notice; M&R – 1 point
 - MCL; Treatment Technique; Nitrate M&R – 5 points
 - Acute MCL & High-Risk Treatment Technique – 10 points
- Plus 1 Added Point Per Year of Oldest PNC Violation

System Score & PNC's

- When is a System a PNC?
It's a PNC when their system score is 11 or more.
- When is a PNC resolved?
The system score is back below 11 and all MCL/TT violations are either resolved or under enforcement.



"YOU'VE ALSO GOT ANTS."

System Score & PNC's

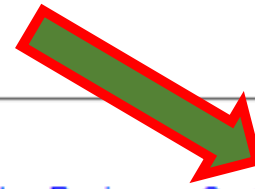
How can I see if I have any PNC's?

Either:

- By Clicking The Link in the Monthly Violations Email, or
- The System Score Link for All Systems at Bottom of Data Online

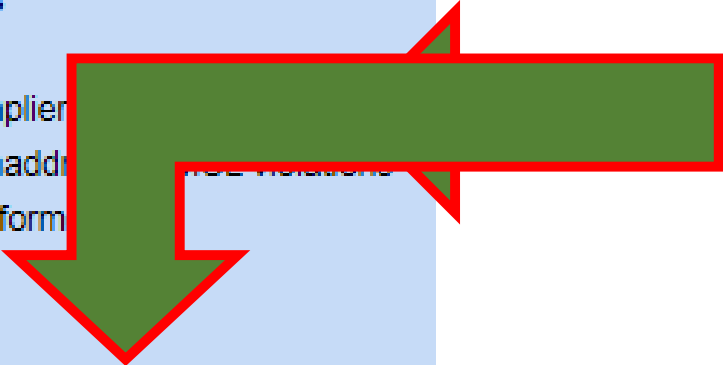
Information by county:

[Inventory](#) :: [Surface Water Systems](#) :: [Water System Surveys](#) :: [Outstanding Performers](#) :: [Plan Reviews](#) :: [System Scores](#) :: [Exceedan](#)
[Alerts](#) :: [Violations](#) :: [Compliance & Enforcement](#) :: [Significant Deficiencies](#) :: [Cross Connection ASRs](#) :: [Treatment Plant Inspections](#) :: |



System Scores

<p>County</p> <div>All Counties ▼</div>	<p>Regulating Agency</p> <div><input checked="" type="radio"/> All Agencies</div> <div><input type="radio"/> County</div> <div><input type="radio"/> State - Region 1</div> <div><input type="radio"/> State - Region 2</div> <div><input type="radio"/> State - All Regions</div> <div><input type="radio"/> Dept. of Agriculture</div>	<p>System Type (EPA Systems Only*)</p> <div><input checked="" type="radio"/> All system types*</div> <div><input type="radio"/> Community</div> <div><input type="radio"/> Transient non-community</div> <div><input type="radio"/> Non-transient non-community</div>
<p>Primary Source</p> <div><input checked="" type="radio"/> All types</div> <div><input type="radio"/> Surface water</div> <div><input type="radio"/> Groundwater</div>	<p>Service Area Types[†]</p> <div><input checked="" type="radio"/> All types</div> <div><input type="radio"/> Schools and day care centers</div> <div><input type="radio"/> Manufactured housing parks</div> <div><input type="radio"/> Residential areas</div> <div><input type="radio"/> Municipalities</div>	<p>Compliance Status</p> <div><input checked="" type="radio"/> Any status</div> <div><input type="radio"/> Priority non-compliance</div> <div><input type="radio"/> Systems with unaddressed violations</div> <div><input type="radio"/> Outstanding performance</div>
<div><input type="checkbox"/> Include data test systems</div>		<div>Show System Scores</div>



periodically (such as after the monthly violations email), Check your PNCs/ System Scores – Are any points building up?

Got One!

System Type	Pop.	Primary Source	# Months PNC [†]	System Score	Points Under Enforcement	Points RTC'd	Go To Related Pages**		
NC	200	GW	3	12	0	14	Vio	Enf	CR
C *	148	GW	--	7	0	10	Vio	Enf	CR
NC	100	GW	--	6	0	2	Vio	Enf	CR



Ways To Address PNCs:

- Find Out Whether Some of the Violation Points Can Be Returned To compliance (RTC'd)
- call them to Resolve for Future – “Collect Your Coliform and Nitrate Samples Before End of Year”
- Get Compliance through Informal/Formal Enforcement Action

RTC:

Violation History

Violation Number	Auto-RTC?	Monitoring Period		Facility ID	Analyte Group	Violation Type - Analyte Count <i>Show analytes for all violations</i>	Enforcement Action - Date <i>Show history</i>	Points
490713	Y	Jan 01, 2016	Dec 31, 2016	EP-A	NO3	Chemical Late/Nonreporting - 1		5
490712	Y	Oct 01, 2016	Dec 31, 2016		TCR	Routine Coliform - Did Not Report ANY - 1		1
490711	N	Jan 01, 2015	Dec 31, 2015	SRC-AA	GWR	Source Assessment Sample - Late/Nonreporting - 1 <i>Show analyte</i>		1
490709	N	Jan 01, 2013	Dec 31, 2013	SRC-AA	GWR	Source Assessment Sample - Late/Nonreporting - 1 <i>Show analyte</i>		1
490710	Y	Jan 01, 2014	Mar 31, 2014		TCR	Routine Coliform - Did Not Report ANY - 1	Returned To Compliance - Apr 25, 2014	1

SYSTEM SCORE SUMMARY

Unaddressed Points: 8
 Number of years the oldest violation has been unaddressed (n): 3
System Score: 11

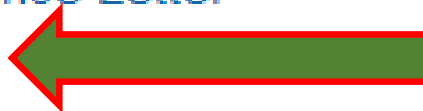
Some Violations Resolve Automatically Once The Next Requirement Is Met, But Others Must be Requested

RTC: do they qualify?

Compliance Resources

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-  [PNC Resolution Process](#)
-  [PNC 5-Month Compliance Letter](#)
-  [Oregon RTC Criteria](#)
-  [Enforcement Procedure](#)



RTC: do they qualify?

RTC criteria

SS points	Violation Text	PN Tier	ADD RTC	Rule	Info	Needed to RTC
10	Chemical MCL based on 1 sample	1	N	Nitrate		Resolve contamination problem or install treatment & 1 quarterly chem report below MCL
10	Chemical MCL based on average of samples	1	N	Nitrate		
5	Chemical MCL based on 1 sample	2	N	Chems not Nitrate		Resolve contamination problem or install treatment & Quarterly RAA below MCL (with sample)
5	Chemical MCL based on average of samples	2	N	Chems not Nitrate		
10	Acute MCL for E.Coli	1	N	Coliform		Resolve contamination problem or install treatment & 2 monthly coliform reports without TC+
5/1**	Chemical Late/Nonreporting		Y	Chems***	**5 points if NO3 - all others 1 point	Meet next reporting period requirements
1	Corrosion Control Late/Nonreporting			LCR		
1	Routine Coliform - Did not report any		Y	Coliform		
1	Routine Coliform - Did not report enough		Y	Coliform		
1	Temporary Routine Coliform: Did not report any		Y	Coliform		
1	Temporary Routine Coliform: Did not report enough		Y	Coliform		
1	Monthly SW Report - Late/Nonreporting		Y	SWTR		
1	Source Assessment Sample - Late/Nonreporting		N	GWTR		
1	Monthly GW compliance Report - Late/Nonreporting		N	GWTR		
1	DBP1 or DBP2 Late/Nonreporting		Y	Chems***		
1	TOC Late/Nonreporting			Chems***	Not currently generated	
1	LCR late/Nonreporting		Y	LCR		
5	Failure to Submit CCT Recommendation			LCR		System starts Plan review with the State for the Corrosion Control treatment.
5	Public Education Late/Nonreporting			LCR		State receiving confirmation of notification to customers
1	Consumer Notification of Results Late/Nonreporting			LCR	Not currently generated	
5	No Qualified Treatment Plant Operator		N	other		Reporting to the state of a certified operator
5	Coliform Investigation Nonreporting		2	Y	Coliform	Turn in investigation / makes corrections OR
5	Coliform Investigation Defects Not Corrected		2	Y	Coliform	2 consecutive months / 1 quarter without TCR problem
5	Prevented Level 2 Investigation		2	N	Coliform	System allows Level 2 investigation to be performed
5	Failure to Install Disinfection		2	N	Coliform	complete installation of disinfection as required
1	Source Sample - Late/Nonreporting		N	GWTR		No Disinfection - Distribution sample after Temp Routines
1	Public Notice Late/Nonreporting		N	CCR/PN		State receiving late PN or violation causing PN is RTC
5	Corrosion Control Non-Compliance		2	N	LCR	Resolve problem causing system to not properly treat the water
10	Failure to maintain 4-log treatment		2	N	GWTR	
10	Failure to Maintain EP Disinfection		2	N	SWTR	
10	Failure to Provide Adequate Contact Time, Size		2	N	SWTR	
10	Turbidity Standards Not Met (95% NTU or MAX NTU)		2	N	SWTR	
1	Raw source monitoring late/Nonreporting		N	LT2		Submit sample results late (if taken in correct period) or submit replacement sample date
1	Raw source monitoring incorrect sample date		N	LT2		

***Chems include IOC, SOC, VOC, Arsenic, Nitrate, TOC and DBP's

RTC: OK, They qualify –
now what?

- Send email Request to compliance.dw@state.or.us with
 - system number/name
 - Which violation (Give Violation #)
 - Basics on how they qualify:
 - Example: “Shocked system and 2 months without a problem”

PNCs: IF You can't RTC Points, what to do?

Here's Some Bad Apples-

System Type	Pop.	Primary Source	# Months PNC [‡]	System Score	Points Under Enforcement	Points RTC'd	Go To Related Pages**
C	60	GW	3	34	124	6	Vio Enf CR
C	250	GW	9	27	0	82	Vio Enf CR
NC	46	GW	4	20	0	3	Vio Enf CR
NC	30	GW	5	20	0	11	Vio Enf CR
NC	30	GW	4	16	20	0	Vio Enf CR
C	59	GW	6	15	0	41	Vio Enf CR
NC	150	GU	8	15	0	10	Vio Enf CR



WILEY WASCALS!

PNC for 5 months: yellow

PNC for 6-7 months: orange

PNC for 8 or more months: red

System Score – references

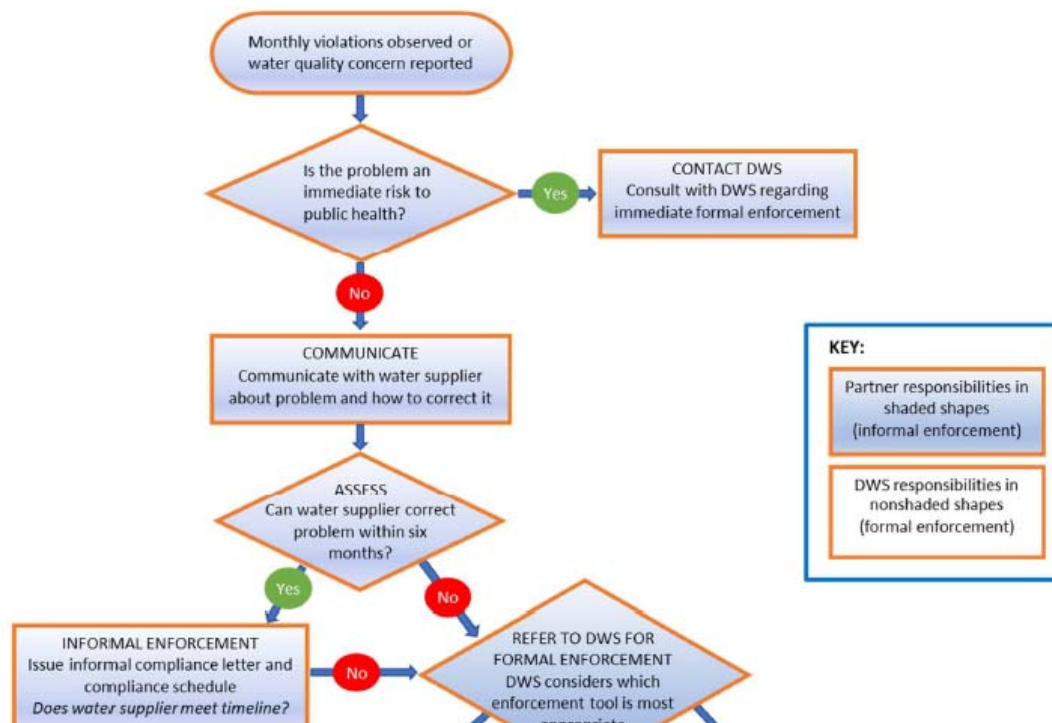
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-
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2019 Enforcement Procedure



- Can system correct within 6 months?
 - If Yes - Partner does Informal Enforcement
 - If No - Refer to DWS for Formal Enforcement
- Will System Meet Informal Enforcement timeline?
 - At 5 months, if not working – Refer to DWS to draft Formal Enforcement (must be in effect at 6 months)

One More Thing to Check Periodically (EaSter Egg...)

Thu 9/19/2019 2:41 PM

CE Michael Charles E
violations online

To: Panwhar Samina T; DANIELS Bradley K; Spielman Abbie; Baird Gregg C; Byrd Michelle P; Clemons Carolyn M; Cunningham-Golik Zachariah; Farrelly Peter R; GENTRY Carrie L; GOSS William H; Hofeld Evan E; HOUGH Daniel L; **Kazmierczak Russell A**; LYON Casey; Macpherson James R; Nusrata James B; Parry Betsy L; PATTEE Tom; Rich Paula J; Salis Karyl L; Stevenson Shawn P; Templin Rebecca A; Word Amelia A; Wray Julie L; marcy.dailey@co.benton.or.us; Megan Watts; Scott, KRUGER; joelfer@co.clackamas.or.us; meredith reiley; Michael McNickle; Erin O'connell; Kevin Hesson; Mike Paul; Peter Cooley (pcooley@chw.coos.or.us);

i You forwarded this message on 9/19/2019 3:18 PM.

Action Items

The violations for August have been validated. The violations included both MCL and M&R violation types. These are viewable on the violations page <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>.**

Chuck Michael
Compliance Officer
OREGON HEALTH AUTHORITY
Public Health Division
Drinking Water Services
971-673-0420
www.healthoregon.org/dwp



Compliance schedules

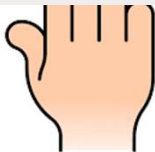
CHECK THEM EITHER BY:

- CLICKING THE LINK IN THE MONTHLY EMAIL, OR
- ON THE COMPLIANCE & ENFORCEMENT LINK AT BOTTOM OF DATA ONLINE

Information by county:

[Inventory](#) :: [Surface Water Systems](#) :: [Water System S](#)

[Alerts](#) :: [Violations](#) :: [Compliance & Enforcement](#)



Compliance and Enforcement Schedules

Regulating Agency: [All Agencies](#) County: [All Counties](#) Schedule Status: ☒ Open ☐ Closed

Schedule Type

- ☒ Compliance Schedules
 - ☐ Lead Action Level Exceedance
 - ☐ Confirmed Source E. coli
 - ☐ Coliform Investigation
 - ☐ Microscopic Particulate Analysis (MPA) Required
 - ☐ Other Compliance Schedule
 - ☐ Bilateral Compliance Agreement
- ☐ Formal Enforcement
 - ☐ Notice of Non-Compliance
 - ☐ Administrative Order
 - ☐ Extension to Administrative Order
 - ☐ Administrative Order Settlement
 - ☐ Civil Penalty Order
 - ☐ Civil Penalty Settlement Agreement
 - ☐ Court Filing

Show Schedules

[Exceedances](#)

[ctions](#) :: [Fluoride](#)

COMPLIANCE SCHEDULES– ARE DUE DATES APPROACHING? STATUS UPDATES?

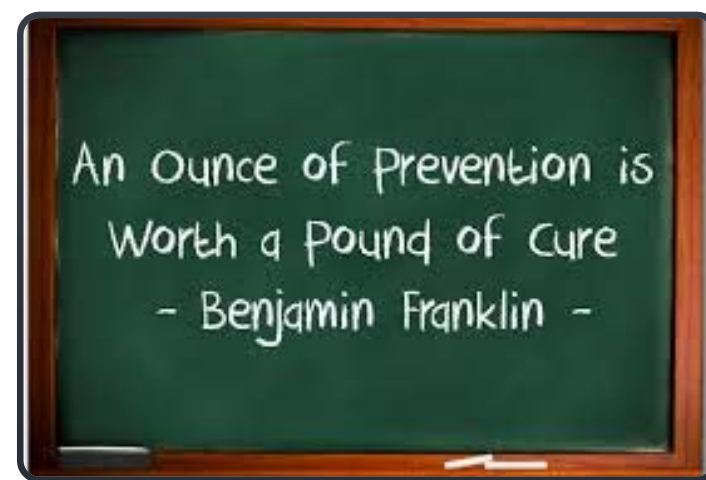
95575	FAST BREAK MARKET	NC	13
	CONFIRMED SOURCE E. COLI	Jun 19, 2019	Open
	<u>Scheduled Activity</u>	<u>Due Date</u>	<u>Date Completed</u>
	ISSUE PUBLIC NOTICE	Jul 02, 2019	Jun 28, 2019
	CORRECT ALL DEFICIENCIES/SUBMIT PLAN-CO	Oct 22, 2019	
	COLIFORM INVESTIGATION	Jun 04, 2019	Open
	<u>Scheduled Activity</u>	<u>Due Date</u>	<u>Date Completed</u>
	COMPLETE LEVEL 2 INVESTIGATION	Jul 14, 2019	Jun 06, 2019
	INSTALL DISINFECTION	Dec 06, 2019	
95499	KILLIONS MARKET	NC	7
	COLIFORM INVESTIGATION	Jan 02, 2019	Open
	<u>Scheduled Activity</u>	<u>Due Date</u>	<u>Date Completed</u>
	COMPLETE LEVEL 2 INVESTIGATION	Feb 03, 2019	Jan 11, 2019
	INSTALL DISINFECTION	Jun 28, 2019	Overdue
00230	WESLINN WATER COMPANY	C	0
	COPPER ACTION LEVEL EXCEEDANCE	Apr 03, 2018	Open
	<u>Scheduled Activity</u>	<u>Due Date</u>	<u>Date Completed</u>
	SUBMIT CONSTRUCTION PLAN	Dec 01, 2018	Dec 03, 2018 - Late
	INSTALL CORROSION CONTROL TREATMENT	Apr 03, 2020	

Compliance schedules: how to report completion

- Water system sends you report/evidence of completion (or you do a site visit)
- Review and verify complete & accurate
- Let DMCE Know if Compliance was Achieved. If contact report is needed, complete (including compliance schedule update section at bottom) and send to compliance.dw@state.or.us
- If contact report not needed (i.e., coliform investigation) just send to same address without the contact report.

Key Take Away Points

- Your Job is to Do What You Can to Keep Your Systems in Compliance
- These Monthly Emails are Tools –
Use the Prompts to Reduce or Avert Problems
- Talking to Systems with Violations May Prevent Unpleasant Surprises for Them (e.g., Increase to Monthly Monitoring) or Enforcement Actions Later



Questions?



Betsy Parry
DWS Technical Staff
541-726-2587 Ext. 30