## Level 2 Investigation Review Silver Falls 2017

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Drinking Water Services
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PUBLIC HEALTH DIVISION Drinking Water Services

## **Overview of Presentation**

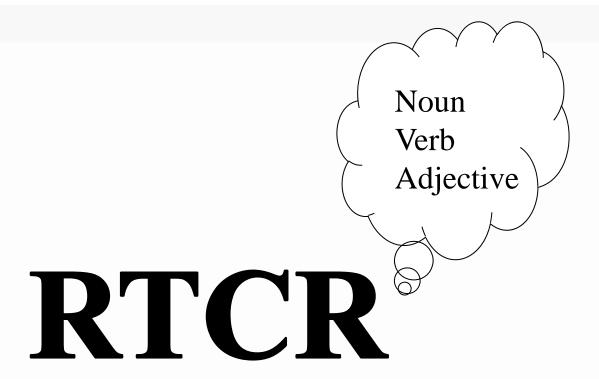
- 1. Level 2 refresher (who, what, when, where, why & how)
- 2. Review of Level 2 form used
- 3. System examples
- 4. Questions/discussion



## RTCR

Revised Total Coliform Rule – adopted 4/1/2016





Revised Total Coliform Rule – adopted 4/1/2016



## **Investigations and Corrective Action**

- Because coliform indicates a potential pathway for contamination into the water system, an investigation is required after confirmed total coliform (or *E. coli*).
- Two levels of investigation: Level 1 (conducted by a water system operator) and Level 2 (conducted by a regulator)
- EPA refers to these as "Assessments"
- If sanitary defect(s) are found, they must be corrected to prevent future contamination.
- The cause of coliform may not always be found.



## **Investigation Scope**

- Investigations seek to identify situations that could affect water quality in the distribution system, including:
  - Atypical events (backflow incident, line breaks, etc.)
  - Changes in distribution system maintenance or operation that could have affected water quality
  - Source water changes or changes/interruptions in treatment practices
  - Inadequacies in sample sites, sampling protocol, or sample processing
  - Damage to or inadequacies in system facilities



## How do I know if a Level 2 has been triggered? (you are sent an email)

- The following criteria elevate a detection or detections to a Level 2 investigation:
  - E. coli MCL (confirmed with a routine EC+ and TC+ repeat/FC+ repeat or a TC+ routine and FC+ repeat)
  - More than one month of multiple TC+ samples (within a rolling 12 month period)
  - No repeat samples after a TC/FC+ routine sample and a Level 1 had already been done in

(Enter) DEPARTMENFOLLINGS) 12 month period (Enter) Division or Office (Mixed Case)

# Is there any reason where a Level 2 is triggered but does not need to be performed?

- YES!!!!
- o If triggered due to no repeat samples collected:
  - If repeat samples had been collected within the 11 days timeframe after the initial positive and turned in late – OR turned in within the 30 day timeframe to complete the Level 2. Then an onsite Level 2 is not needed.



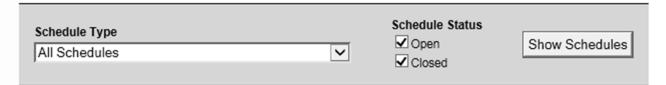
## Do all triggered investigations count towards a treatment requirement?

- Not all triggers count!
- The health based triggers (sample results) count, monitoring and reporting trigger (no repeat samples/late) do not get factored in.
- HOWEVER, if you feel differently, please consult with your DWS contact.



#### What does it look like online?

#### **Compliance and Enforcement Schedules**



Type of Action	Date Issued	Due Date	Closed Date
Coliform Investigation	Jan 10, 2017		Jan 24, 2017
LEVEL 2 INVESTIGATION - NO REPEATS		Feb 11, 2017	Jan 24, 2017
Coliform Investigation	Sep 30, 2016		Nov 02, 2016
LEVEL 1 INVESTIGATION - NO REPEATS		Oct 30, 2016	Nov 02, 2016 - Late

For all compliance errors please phone Brad Daniels, DWS Compliance Specialist, at 971-673-0405.

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 :: Site Visits :: Public Notice :: Plan Review



## **Level 1 Coliform Investigations**

- Conducted by the water system staff
- Must be completed within 30 days
- Includes a basic examination of the source water, treatment, distribution system and relevant operational practices
- Covers likely cause, corrective action plan, and schedule for correction.
- Investigation form is available on our website
- Reports will be reviewed to ensure the investigation was adequate and complete.

## Level 1 Coliform Investigation Triggers

- Level 1 investigations are triggered by the following events:
  - More than 1 sample is total coliform positive at systems collecting fewer than 40 samples per month
  - More than 5% of samples are total coliform positive at systems collecting 40 or more samples per month
  - Failure to collect every required repeat sample



## **Level 2 Coliform Investigations**

- Conducted by the water system's regulating agency (DWS, County, or Oregon Dept. of Agriculture)
- A more in-depth examination of the system and its monitoring and operational practices
- Must be completed in 30 days
- Level 2 investigations are triggered by the following events:
  - Violation of the MCL for E. coli
  - Two Level 1 triggers within a 12 month period



### Level 2 Coliform Investigations – the real question...

- Do I have to do a site visit EVERY time for a system that has had multiple assessments triggered.....
- No you do not.... But let's discuss



### On-site discussion points:

- When was the last time you made a site visit?
- Did you thoroughly look at the system?
- How comfortable are you with the water system's operator?

Ultimately the decision is yours – you are the ones that know the water system the best.



### How do I document a Level 2 investigation?

- All investigations require follow up. A follow up is documented with the completion of the investigation forms. The forms are then sent in to the compliance email.
- If a Level 2 is decided, by the regulator, to be done over the phone, a Level 2 form still needs to be filled out and submitted. This will then close out the schedule.





PWS Name:

#### Level 1 Coliform Investigation Form

Oregon Health Authority, Drinking Water Services

PWS ID #: 41

Complete the coliform investigation and return the form within 30 days to your County, Dept. of Ag, or State regulatory contact

	Name				Telephone #	
Operator in Direct Responsible Charge						
Person(s) that collected samples if different than above						
Date of Investigation:						
		INVESTIGAT	ION DE	TAILS		
Did any of the following events occur prior to collection of positive total coliform samples?	f the	Yes/No	Yes/No N/A If Ye		es, describe issu	e
Loss of pressure anywhere in the system		Y N				
2. Maintenance on the system that could have introduced cont	amination	Y N				
Repair of broken water lines		Y N				
4. New water lines or service connections added to the system	1	Y N				
Vandalism or unauthorized access to facilities		Y N				
Water line flushing or fire fighting event		Y N				
7. Low chlorine or chloramine residual anywhere in the system	1	Y N				
8. Failure of chlorination/UV equipment or minimums not met		Y N				
9. New or different source of water introduced (example: back	up well)	Y N				
10. Loss of electrical power		Y N				
11. Unprotected connection to non-potable water discovered (	example:	Y N				
private well, irrigation line, fire sprinkler system)						
12. Failure to test all backflow prevention devices within the last		Y N				
13. Discovery of water system components submerged in water	er	Y□ N□				
(example: well or valves in a flooded vault)						
Wells & Springs - Inspect each groundwater source for physic and report:	cal defects	Yes/No	N/A	If Ye	es, describe issu	e
Cracks or holes in well seal or casing		Y N				
2. Repair/replacement of well/spring components (example: we	ell pump)	Y N				
Wellhead flooded or water puddled near well		Y N				
Screen for well vent missing or damaged		Y N				
5. Feces, fecal source or other unsanitary conditions at the we	ll/spring	Y N				
Leaking sewer lines or septic tanks near well/spring		Y N				
7. Cracks or holes in springbox		Y N				
8. Water flowing or puddled on the ground around springbox		Y N				
				-		

Rev. 2/16/16



## Level 1 Coliform Investigation Form Page 2 of 2

Storage Tanks - Inspect each storage tank for physical defects and report:	Yes/No	N/A	If Yes, describe issue
Vent screens missing or damaged	Y N		
Roof access hatch or other openings poorly or not sealed	Y N		
Screen or flap valve on overflow pipe outlet missing or damaged	YN		
4. Tank in poor condition	YN		
5. Tank has not been cleaned in recent memory	YN		
6. Presence of contamination in tank (example: dead animals, insects)	YN		
7. Recent maintenance or work done on the tank	Y N		
Sampling Protocol - Review and report:	Yes/No	N/A	If Yes, describe issue
Tap flushed for less than 3 minutes	Y N		
Aerator, screen, hose, or other attachment present during sampling	Y N		
3. Leaky or swivel faucet used	Y N		
Samples not kept cool during storage/transportation	Y N		
5. Inside of bottle/lid touched or lid set down	Y N		
6. Heavy rainfall or wind at time of sampling	YN		
7. Sampled at site not on sampling plan or at a previously unused site	Y N		
8. Other sampling problems	Y N		
Other	Yes/No		If Yes, describe issue
Any other issues/problems/sources of contamination that may have caused the positive coliform result	Y N		
SUMMARY: Based on the results of your investigation and any positive total coliform sample(s) from your water system? (Do not consider the corrected of the cor	ect the abov	()	
ERTIFICATION: I certify that the information submitted in respondents:		-	ions above is accurate to the best of my knowledge.  DATE:
For Agency Use Only: Reviewed by Date	Reviewed:		□ Complete □ Needs Revision





### Level 2 Coliform Investigation Form

Oregon Health Authority, Drinking Water Services

DMC Nomes						DIA	C ID #.	144
PWS Name:						PW	S ID #:	41
	Name					Tele	ephone	e #
Operator in Direct Responsible Charge (DRC)								
Person that collected samples if different than DRC								
Date of Investigation: 10/17/2016								
INVESTIGATION DETAILS								
Groundwater Source		Well/Sprii		ng   Well/Sp				
Inspect each groundwater source for physical defe	cts	Name	Name	Nam	ie Name	N	/A	If Yes, describe issue
and report:		Source A						
Cracks or holes in well seal or casing		Y N	Y N	Y N				
Wellhead lacks a watertight seal		Y N	Y N	Y   N				
Screen for well vent missing or damaged		Y N	Y N	Y N	Y N			
<ol> <li>Wellhead subjected to flooding or standing water n</li> </ol>		Y N	Y N	Y N	Y N			
<ol><li>Leaking sewer lines or septic tanks near well/sprin</li></ol>	g	Y N	Y N	Y N	Y N			
Feces, fecal source observed near well/spring		Y N	Y N	Y N	Y N			
7. Unsanitary conditions at the well/spring		Y N	Y N	Y N	Y N			
8. Contamination during pump repair/replacement or	other	Y N	Y N	Y N	☐ Y☐ N☐	1 0		
wellhead/spring repair					Y N			
Use of an unapproved or untested source		Y N	Y N	Y   N				
<ol><li>Indication of surface water entering springbox</li></ol>		Y N	Y N	Y N				
11. Cracks or holes in springbox		Y N	Y N	Y N	Y N		<b>a</b>	
Treatment and Disinfection		Plant	Plant	Plant	Plant			
Inspect each treatment plant for physical defects ar	nd report:	Name	Name	Name	Name N	/A	li li	f Yes, describe issue
Inability to maintain residual throughout the distribution  system	tion	Y N	Y   N	Y N	Y	$\triangleleft$		
Failure of disinfection equipment		Y N	YNN	Y N	YE NE D			
Failure to monitor and replace chlorine supply		Y	Y	Y		3		
Improper chlorine residual measurements (method)	or	Y	YN	Y				
frequency)	OI .	·     ·	'U'	·     ·		Z		
5. Failure to meet required minimum chlorine residual	at the	V = V =		V= V=		7	_	
entry point (GW only)		Y N	Y   N	Y N	Y	$\triangleleft$		
		•	•					Rev. 2/16/16

## Level 2 Coliform Investigation Form Page 2 of 4

Treatment and Disinfection Inspect each treatment plant for physical defects and report:	Plant Name	Plant Name	Plant Name	Plant Name	N/A	If Yes, describe issue
6. Failure to meet CTs at all times (SW only)	YN	Y N	YN	YN	M	
7. Failure to meet turbidity standards (SW only)	Y N	Y N	Y N	Y N	$\overline{\boxtimes}$	
8. Failure to meet filtration requirements (SW only)	Y N	Y N	Y N	Y N	Ø	
Storage Tanks Inspect each storage tank for physical defects and report:	Tank Name	Tank Name	Tank Name	Tank Name	N/A	If Yes, describe issue
Holes in tank that could allow entry of insects or small animal	Y   N	Y N	Y   N	Y   N	$\boxtimes$	
Roof access hatch or other openings inadequately sealed	Y N	Y N	Y N	Y N	$\bowtie$	
Vent screens missing or damaged	Y N	Y N	Y N	Y N	$\boxtimes$	
Screen or flap valve on overflow pipe outlet missing or damaged	Y   N	Y N	Y   N	Y   N	$\boxtimes$	
5. Presence of contamination in tank (example: dead animals, insects)	Y   N	Y N	Y   N	Y   N	$\boxtimes$	
Recent maintenance or work done on the tank	Y N	Y N	Y N	Y N	$\bowtie$	
7. Improperly cleaned or maintained storage tank	Y N	Y N	Y N	Y N	$\bowtie$	
Leaks in tank that could be harboring growth	Y N	Y N	Y N	Y N	$\boxtimes$	
Inadequate tank controls resulting in poor turnover	Y N	Y N	Y N	Y N	$\bowtie$	
Bladder pressure tank waterlogged	Y N	Y N	Y N	Y N	$\boxtimes$	
Distribution System Inspect the distribution system for physical defects and repor	t:	Yes/No	N/A		lf	Yes, describe issue
Failure to maintain adequate pressure or low pressure event pump failure leading to low pressure)	(example:	Y□ N⊠				
Recent main break or repair of broken water lines		Y N				
New water lines or service connections added to the system		Y N				
<ol> <li>Improper construction of new, replaced, or renovated lines or connections</li> </ol>	service	Y□ N⊠				
Known leaks in the distribution system		Y N				
6. Supervisory control and data acquisition (SCADA) and control	l issues	Y N				
Cross Connection and Backflow Inspect the system for cross connections and report:		Yes/No	N/A		lf	Yes, describe issue
Unauthorized connections to water mains		Y N				
Known recent unprotected backflow incident		Y N				
3. Unprotected cross connection(s) discovered (ex. unprotected	connection	Y N				



## Level 2 Coliform Investigation Form Page 3 of 4

Cross Connection and Backflow	Yes/No	N/A	If Yes, describe issue
Inspect the system for cross connections and report:	100/110	10,71	11 100, 00001120 10000
with a private well)			
Failure of installed backflow prevention devices (example: continuous)	Y N	$\boxtimes$	
discharge from the relief port on a device)			
Any water system components submerged in an underground vault	Y N	$\bowtie$	
Failure to test all backflow prevention devices within the last year	Y N	$\boxtimes$	
Sampling Protocol	Yes/No	N/A	If Van danariba inqua
Report any defects in sampling protocol:	res/No	N/A	If Yes, describe issue
Tap flushed for less than 3 minutes	YM N		Sample taps not flushed >3 minutes
Aerator, screen, hose, or other attachment present during sampling	Y N		
Leaky or swivel faucet used	Y N		
Samples not kept cool during storage/transportation	Y N		
Inside of bottle/lid touched or lid set down	YM N		Sampler set lid down
Heavy rainfall or wind at time of sampling	Y N		
7. Sampled at site not on coliform sampling plan or previously unused site	YN N		No coliform sampling plan
Other sampling problems	Y□ N⊠		
General Operations	Yes/No	N/A	If Yes, describe issue
Report any defects in general operation of the system:	resino	NA	ii res, describe issue
1. Power outages that affected water system facilities during the 30 days	Y□ N⊠		
prior to the TC+ or EC + findings			
Water line flushing or fire fighting event	Y N		
Inadequate disinfection during and after repairs or new construction	YM N		New pipeline installed and possible inadequate disinfection after
(example: pipe repair, well repair, new tank)			repairs
4. Any other issues/problems/sources of contamination that may have			
caused the positive coliform result (e.g. vandalism: unauthorized access	) Y N N		



#### Level 2 Coliform Investigation Form

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**SUMMARY:** Based on the results of the investigation and any other available information, what is believed to be the cause(s) of the *E. coli* positive or multiple total coliform positive sample(s) from the public water system?

The possible cause for the multiple total coliform positive samples from the public water system could be inadequate disinfection of the water system after the pipeline was reconfigured/repaired in the pumphouse.

CORRECTIVE ACTIONS: What actions has the water system taken to correct the above mentioned issue(s)? If additional time is needed to correct a deficiency, indicate the date that it will be corrected.

The water system was provided documents outlining the procedures to shock chorinate their well and the distribution system. The water system did shock chlorinate the system this afternoon (10-17-2026) and would take a special sample to determine if the corrective action took effect.



## **Corrective Action Requirements**

- Sanitary defects must be described on the investigation form.
- Sanitary defects found during an investigation must be corrected and corrective actions described on the investigation form.
- The water system must submit the investigation form to their regulator within 30 days of the investigation trigger.
- The form must indicate a timetable for any corrective actions not already completed.



# System investigation case studies



## **UPS-Hermiston**

1 well, 1 PT, one connection

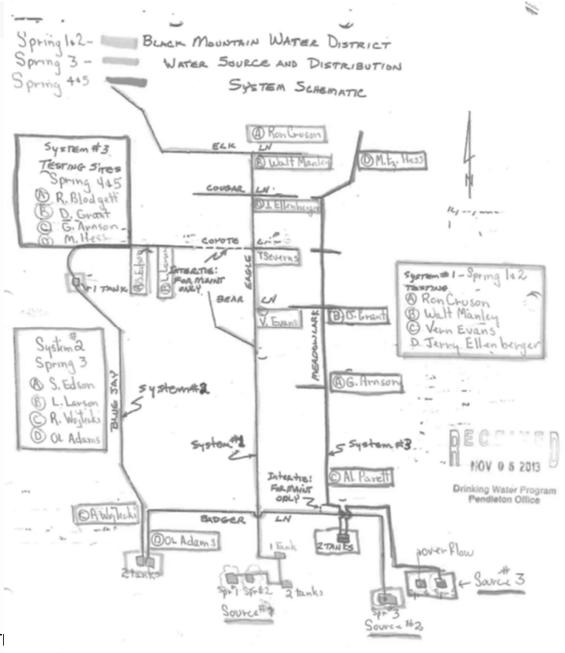


- Distinction of being the first system in the state to trigger a mandatory treatment install.
- System was having a little total coliform issue
  - 2013 1 MCL vio
  - 2015 5 MCL vio
  - 2016 1 MCL and investigations
  - Source single GW well and all triggered samples were total coliform positive.
  - Concern had been raised late 2015 due to knowledge of a neighboring well with confirmed contamination and the system will need to start planning.
  - UV unit\* was approved and installed January 2017

## Black Mountain Water District







(Enter) DEPARTI (Enter) Division or Office (Mixed Case)



Sample	s Required 3	Sample Type RT			Sampling Period Type MONTH	
Spreadsheet	-					
	Number of Samples Reported					
Period End Date	Routines Reported	Routine TC+	Routine FC+	Repeats Reported	Repeat TC+	Repeat FC+
Mar 31, 2017	3	0	0	0	0	0
Feb 28, 2017	3	2	0	6	1	0
Jan 31, 2017	3	0	0	0	0	0
Dec 31, 2016	3	0	0	0	0	0
Nov 30, 2016	3	0	0	0	0	0
Oct 31, 2016	3	2	0	6	3	0
Sep 30, 2016	3	0	0	0	0	0
Aug 31, 2016	3	0	0	0	0	0
Jul 31, 2016	3	0	0	0	0	0
Jun 30, 2016	3	0	0	0	0	0
May 31, 2016	3	1	0	3	3	0
Apr 30, 2016	3	0	0	0	0	0
Mar 31, 2016	3	0	0	0	0	0
Feb 29, 2016	3	0	0	0	0	0
Jan 31, 2016	5	0	0	0	0	0
Dec 31, 2015	0	0	0	0	0	0
Dec 31, 2015	5	1	0	3	0	0
Nov 30, 2015	3	1	0	3	0	0
Oct 31, 2015	5	0	0	0	0	0
Sep 30, 2015	3	1	0	3	0	0
Aug 31, 2015	5	1	0	3	0	0
Jul 31, 2015	3	2	1	3	0	0
Jun 30, 2015	3	0	0	0	0	0
May 31, 2015	3	0	0	0	0	0
Apr 30, 2015	3	0	0	0	0	0
Mar 31, 2015	5	0	0	0	0	0
Feb 28, 2015	3	2	0	6	0	0
Jan 31, 2015	5	0	0	0	0	0
Dec 31, 2014	3	1	1	13	6	0
Nov 30, 2014	5	0	0	0	0	0
Oct 31, 2014	5	1	0	3	0	0
Sep 30, 2014	3	1	0	3	0	0
(Enter) DEPARTMEN Aug 31, 2014	4	0	0	0	0	0
(Finter) Divinion on Office (Missed O	\					

**Current Coliform Summary History** 



(Enter) Division or Office (Mixed Case)



(Enter) DEPARTMENT (ALL CAPS) (Enter) Division or Office (Mixed Case)





(Enter) DEPARTMENT (ALL CAPS) (Enter) Division or Office (Mixed Case)



Introduction :: Data Search Options :: WS Name Look Up :: WS ID Look Up :: DWS Home :: Quick Data Links

#### PWS ID: 00370 ---- BLACK MOUNTAIN WATER DISTRICT

#### **Compliance and Enforcement Schedules**

Schedule Type All Schedules	V	Schedule Status  ✓ Open ✓ Closed	Show Schedules
·		Closed	

Type of Action	Date Issued	Due Date	Closed Date
Coliform Investigation	Feb 17, 2017		Open
COMPLETE LEVEL 2 INVESTIGATION		Mar 30, 2017	Overdue
INSTALL DISINFECTION		Aug 22, 2017	
Coliform Investigation	Oct 24, 2016		Nov 10, 2016
COMPLETE LEVEL 2 INVESTIGATION		Dec 03, 2016	Nov 10, 2016
Coliform Investigation	May 31, 2016		Jun 03, 2016
COMPLETE LEVEL 1 INVESTIGATION		Jun 30, 2016	Jun 03, 2016



## So – what is next for them?

The circuit rider will be making a site visit today (4/19/17). Will await their report and have to see how we all can proceed.

It is a complicated scenario and am hoping one day to be able to have a success story follow up to show. But for now, it's a wait and see.







## **Questions?**



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