


**Quiz Show:**

**Is it a PWS or isn't it?**

**(When is it a purchasing PWS vs a connection)**

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Technical Manager



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**Scope of OARs**

0010(1) says the rules apply to any PWS providing piped water for human consumption.

0010(3)(a) says these rules do NOT apply if:

- Consists only of **distribution and storage** facilities and does not have any source or treatment facilities installed to comply with the MCLs covered by these rules; and
- **Obtains all of its water from**, but is not owned or operated by, a **public water system** to which these rules apply; and
- **Does not sell water directly** to any person; and
- Is not a carrier which conveys passengers in interstate commerce.



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**Plumbing code vs distribution**

- OARs apply to water systems and piping within public right of way.
- "Point of Delivery" or "POD" means the point of connection between a public water system and the user's water system. **Beyond the POD, the Oregon Plumbing Specialty Code applies.**
- Also see these definitions:
  - Distribution System. Delivers water to the user's premise.
  - Service connection: where water delivered meets the user's premise. PWS have responsibility up to the property line or meter.



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**Questions to ask**

- Who owns and maintains this part of the system?
- Do these connections pay specifically for the water? To whom?
- Are all users on one property?



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**Scenario #1**

A mobile home park owner charges each tenant a combined bill for the space, water, sewer, electricity. Water comes from the city.

Is the mobile home park a purchasing public water system?

Yes  
No, it's just a connection (poll)

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**Discussion: Scenario #1**

A mobile home park owner charges each tenant a combined bill for the space, water, sewer, electricity. Water comes from the city.

The mobile home park is **just a connection!**

Rules require that they "directly bill" for water, which is not happening here.

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**Scenario #2**

A group of individual homes in a subdivision has formed an association and maintains their own pipes. The association pays the city for water used based on a master meter. Each home has a meter, and the owners are billed by usage.

Is the subdivision a purchasing public water system?

Yes  
No (poll)

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**Discussion: Scenario #2**

A group of individual homes in a subdivision has formed an association and maintains their own pipes. The association pays the city for water used based on a master meter. Each home has a meter, and the owners are billed by usage.

Yes, the subdivision is a purchasing public water system.

There are multiple properties involved and the association directly bills for the water.

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**Scenario #3**

A group of homes with its own well also serves an RV park. Some people live at the RV park year-round. Spaces are billed per night.

Is the RV park a purchasing water system?

Yes  
No, just a connection

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**Discussion Scenario #3**

A group of homes with its own well also serves an RV park. Some people live at the RV park year-round. Spaces are billed per night.

No, the RV park is just a connection.

The RV park is one property just like each other property. They do not bill the guests specifically for water.

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**Scenario #4**

You need to conduct a survey at a mill with its own well. There are several buildings. The operator tells you the pressure often falls below 20psi at some buildings. Do you fill out the Distribution page of the survey forms, noting deficiencies if found?

Yes, distribution page should be used  
No, OARs do not apply to piping

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**Discussion: Scenario #4**

You need to conduct a survey at a mill with its own well. There are several buildings. The operator tells you the pressure often falls below 20psi at some buildings. Do you fill out the Distribution page of the survey forms, noting deficiencies if found?

No, OARs and therefore significant deficiencies do not apply – it's all on one property so plumbing code applies.

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**Submetering**

- "Submetering" means a water meter by which a property owner (or association) meters individual water use after the water passes through a master meter. It does not constitute applying a direct charge for water or directly selling water to a person.

The OARs do not apply to facilities that submeter if it:

- Receives all of its water from, but is not owned by, another public water system; and
- Consists only of distribution and storage facilities and where all such facilities and all submeters are located **on a single parcel of property**, and the water system does not have any source or treatment facilities installed to comply with the MCLs.

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**Questions to ask**

- Is there a master meter?
- Does an association pay the seller based on water usage?
- Are the users all on one property, even if jointly owned?



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**Scenario #5**

A condo building that has a mix of vacation rentals and residents gets water from the city with a master meter. Each condo has a meter and residents are billed for that usage.

Is the building purchasing public water system?

Yes  
No

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**Discussion: Scenario #5**

A condo building that has a mix of vacation rentals and residents gets water from the city. Each condo has a meter and residents are billed for that usage.

The condos, though individually owned, are on property owned by an association. Therefore, this is considered submetering and **the building is just one connection.**

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**Scenario #6**

An apartment complex with multiple buildings serving hundreds of people gets water from the city. They are concerned about water usage and want to encourage conservation. Each apartment has a meter and residents are billed for that usage.

Is the apartment complex a purchasing water system?

- Yes
- No

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**Discussion: Scenario #6**

An apartment complex with multiple buildings gets water from the city. They are concerned about water usage and want to encourage conservation. Each apartment has a meter and residents are billed for that usage.

The complex is considered to be submetered. The apartment complex is on one parcel of property so **is considered a connection rather than a PWS.**

The piping in and between the buildings is covered by the plumbing code, not OAR 333-061-0050 construction standards.

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**Scenario #7**

A city purchased a trailer equipped with filtration and disinfection to be used with any water source in case of an emergency. Customers would walk up and fill their own containers.

Is this trailer regulated by drinking water rules (plan review, monitoring, etc)? If so, what classification would it be?

Yes, this is a PWS.  
No, this is not a PWS.

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**Discussion: Scenario #7**

A city purchased a trailer equipped with filtration and disinfection to be used with any water source in case of an emergency. Customers would walk up and fill their own containers.

The scope of OAR 333-061 is for "piped water for human consumption," and in this case the water is not piped to the user's premise but is carried in containers. Therefore, OARs do not apply to this scenario, and it would not be a PWS.

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**Scenario #8**

A bed and breakfast has 5 double rooms. There is a 50% occupancy rate. OHA-FPL licenses them. Is this a PWS?

Yes  
No

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**Discussion: Scenario #8**

A bed and breakfast has 5 double rooms. There is a 50% occupancy rate. OHA-FPL licenses them. Is this a PWS?

**No.** They do not serve an average of at least 10 people per day.

As a courtesy, DWS reviews the plans for the source and communicates to FPL / partners so they may say whether is has an "approved" source.

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**Scenario #9**

A winery and tasting room has 5 employees. On Saturdays and Sundays, about 40 people come in to taste wine. They serve bottled water upon request and crackers are the only food provided. Restrooms are available.

Is this a PWS?

- Yes
- No

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**Discussion: Scenario #9**

A winery and tasting room has 5 employees. On Saturdays and Sundays, about 40 people come in to taste wine. They serve bottled water upon request and crackers are the only food provided. Restrooms are available.

Though tap water is not served, restrooms are available. Rather than estimate how many use the restroom, we assume they all do.

$(5 \text{ people} \times 5 \text{ days}) + (45 \text{ people} \times 2 \text{ days}) = 115$

Average over 7 days = 16.4

Since > 10 per day, **this is a non-EPA system.**

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**Bonus Round**

Challenge the group by putting your odd scenario in the chat!

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**Questions and Discussion**



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