Oregon Drinking Water News
PIPELINE
Department of Human Services, Drinking Water Program

Vol. 21 Issue 2 SPRING 2006 *http://oregon.gov/DHS/ph/dwp/*

Direct lab reporting is underway!

by Dave Leland

On April 1, labs began faxing to the Drinking Water Program of the Department of Human Services (DHS) the results of any validated public water system compliance samples that exceed a maximum contaminant level. This is now required by Senate Bill 1080, passed by the 2005 Legislature. For the most part, the results are routine or repeat coliform bacteria samples that are positive (coliform-present). On receipt, we rapidly communicate those results to the appropriate program or county health department staff so that they can contact you, review repeat sampling procedures and consult with you on any next steps to protect public health.

We have a dedicated fax machine and phone line in the Portland office for that single purpose. During April, the first full month of reporting, we received 39 coliform-positive results by fax.

Details of the direct lab procedures are explained beginning on page four in the form of "frequently-asked questions." These can also be found on our Web site.

Dave Leland, PE, is Manager of the Drinking Water Program / (971) 673-0415 or david.e.leland@state.or.us

Inside

Kari Salis receives AWWA award

by Chris Uber

On behalf of the Pacific Northwest Section-American Water Works Association, it is my pleasure to recognize Kari Salis of the Oregon Drinking Water Program on her receipt of the **Kenneth J. Miller Founder's Award**, Water For People's most prestigious volunteer award. Water For People is a North American response to the water, sanitation and health needs of millions of families living in the developing world (find out more at *www.waterforpeople.org*).

Kari is recognized for her outstanding contributions to Water For People efforts in fund-raising, education, publicity, committee leadership and awareness- raising here in the Pacific Northwest. Kari's dedication to Water For People and her constant commitment to this cause truly make this a well-deserved recognition. I speak for the entire Board of Trustees of the Pacific Northwest Section in expressing our appreciation for Kari's contributions. Congratulations, Kari!

Chris Uber is Chair of the Pacific Northwest Section of the American Water Works Association.

Certifications

by Ron Hall

Operator certification

The Drinking Water Program regretfully accepted the resignation of Deb Weatherford, Operator Certification Program coordinator, effective April 21. Deb worked the position for five years, working hard toward standardizing forms, maintaining an ever increasingly complex database and being responsive to the requests and the needs of the regulated community. She will be missed.

Recruitment for her replacement has begun and we hope to have the position filled as soon as possible. In the meantime, please be patient with Ron and Lee while they try to backfill in her absence.

Cross Connection/Backflow Prevention

The Drinking Water Program also accepted Kate Mattimore's resignation effective April 7. Kate worked as the Cross Connection/Backflow Prevention program coordinator for a little more than two years and managed to re-establish program standards, update the database and handle the multiple inquiries in a professional manner. She'll still be in the business but is now employed with BMI Inc. We look forward to working with her in her new capacity.

We are happy to announce that Dewey Darold, who has been working in the program's Technical Services Unit, has accepted the position as the new program specialist for the Cross Connection/Backflow Prevention program. Dewey has an excellent technical background in environmental health work, having worked with the Department of Environmental Quality and Clackamas County in the on-site septic program. He has also taken the Linn-Benton Community College Water/Wastewater training. He has been trained as a tester and will be updating his certification as he goes forward in his new position. The program phone number will remain the same at (971) 673-1220.

In a related matter, we've been advised that a couple of unauthorized devices are being installed in a few locations in Oregon. They are Wilkins 975XLTCU RP device and a Wilkins 950 XLTU double check valve assembly. Oregon only allows installation of devices that have been approved by the University of Southern California's Foundation for Cross Connection Control and Hydraulic Research.

That list is updated periodically and will be available from the cross connection program specialist when the position is filled.

While we're not recommending that these devices be removed, installers, testers and purveyors should take inventory of any existing sites and not install any more. The company intends to submit the device for approval and expects to receive it by August 2006.

Ron Hall, RS, is manager of the Protection, Planning & Certification Unit of the Drinking Water Program / (971) 673-0409 or ronald.a.hall@state.or.us

Be sure to measure and record chlorine residual when sampling for bacteria!

by Diane Stockton

State and EPA rules require water suppliers that supply drinking water containing a chemical disinfectant measure and report the disinfectant residual at the same frequency as their coliform bacteria monitoring. We've made it easy for you — each time you collect a compliance sample for coliform bacteria, simply indicate on the lab form whether the water is chlorinated (yes/no), and if yes, measure the residual at that point and record the residual directly on the lab form.

Specifically, public water suppliers that have chlorine or chloramines in their water must:

- Measure the residual at the same points in the distribution system and at the same time when coliform bacteria are sampled; and
- Achieve at least a detectable free or total chlorine residual (0.2 mg/l for color comparator test kits); and
- Not exceed a maximum residual disinfectant level of 4.0 mg/l of free or total chlorine (calculated as an annual average computed quarterly).

Starting October 1, 2006, DHS will identify and assign violations for failure to report disinfectant residuals with the coliform bacteria results.

(See: OAR 333-061-0036(3)(b)(D); OAR 333-061-0036(8); and OAR 333-061-0031(1)).

Diane Stockton is manager of the Data Management & Compliance Assurance Unit of the Drinking Water Program (971) 673-0424 or diane.g.stockton@state.or.us

Drinking water revolving fund

The $100 million Oregon success

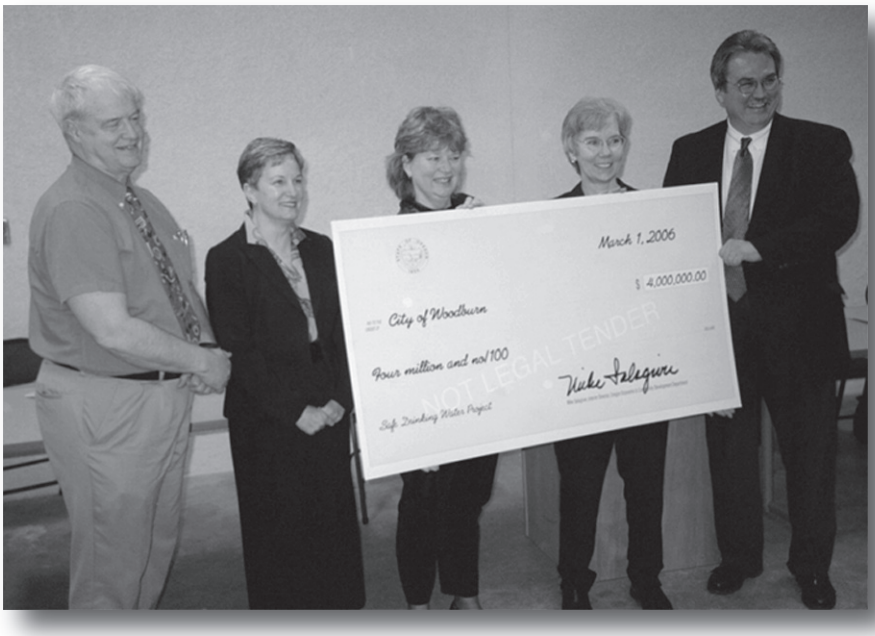
by Angela Wilson and Roberto Reyes-Colon

The partnership begun in 1996 between the federal government and the states, including Puerto Rico and Guam, reached a milestone in Oregon. This unique federal and state partnership has distributed more than $100 million in loan funds for water system upgrades to 65 communities throughout the state benefiting more than 200,000 Oregonians by helping their water suppliers maintain safe drinking water standards.

Woodburn water treatment plant. (One of the three built.)

On March 1, 2006, state and local officials marked the $100 million milestone with a ceremony and tour of improvements made to the City of Woodburn three water treatment plants using $4 million in loan funds.

In Oregon, a partnership between the DHS Drinking Water Program and the Oregon Economic & Community Development Department (OECDD) administers the loan program. The Drinking Water Program processes requests for funding from community water suppliers. OECDD provides state funds (20 percent of each low-interest federal loan) and manages the loans.



Elected officials and agency representatives with ceremonial check (L to R: Sen. Peter Courtney, Rep. Betty Komp, Mayor Kathy Figley, Dr. Susan Allan (DHS-Public Health Division), Mike Salsgiver (OECDD Interim Director).

As funds are repaid, loans are made available to other communities.

The fund assists water suppliers to make improvements to meet safe drinking water standards. Improvements have included the installation of new water treatment plants, construction of new wells and storage tanks, and the replacement of miles of pipeline.

Most loan recipients are small Oregon cities and towns with few or no resources available for major projects. Larger cities like Woodburn, Pendleton and Springfield also benefit.

"The bottom line is that these communities are better able to comply with federal Environmental Protection Agency (EPA) drinking water quality standards," says Dave Leland, manager of the Drinking Water Program.

Information about the loan fund is on the Web at *http://oregon.gov//DHS/ph/dwp/srlf.shtml* or by calling Roberto Reyes-Colon, Loan Fund Coordinator, 971-673-0422.

Angela Wilson was the Public Health Educator for the Office of Environmental Public Health.

Roberto Reyes-Colon is the Loan Fund Coordinator for the Drinking Water Program / (971) 673-0422 or roberto.reyes-colon@state.or.us

Drinking water certified laboratories: Direct Lab Reporting Procedure effective April 1, 2006

The 2005 Oregon Legislature amended ORS 448.150 requiring that certified/accredited drinking water laboratories report directly to the Department of Human Services-Drinking Water Program (DHS-DWP) any analytical result that exceeds a Maximum Contaminant Level (MCL). Final regulatory language [OAR 333-061-0040(1)(b)] states:

> *Laboratories that issue final test reports shall report the validated results of any analysis directly to the department and to the water supplier if the analysis shows that a sample contains contaminant levels in excess of any maximum contaminant level specified in the water quality standards within (24) hours of obtaining the results. Subcontracted laboratories shall report such results to their client laboratory within (24) hours.*

Q: When does this requirement become effective?

A: April 1, 2006. Beginning on that date, all reporting labs must submit analytical results exceeding established drinking water MCL standards to DHS-DWP within 24 hours.

Q: How does the lab notify DHS-DWP?

A: FAX a copy of the validated lab report number to (971) 673-0458. This is a dedicated FAX machine only for receiving these reports. Reports must include water system name, PWS ID number, and source identification.

No special reporting forms or other documentation is necessary.

Q: How will DHS-DWP confirm receipt of the faxed report from the lab?

A: Upon receipt, DHS-DWP will date-stamp the received lab report and fax back the date-stamped copy to the fax number noted on the original transmittal.

Q: Can the lab report electronically instead of by FAX?

A: No. For now, DHS-DWP is set up to receive direct lab notification by FAX method only. Should electronic reporting become available in the future, all labs will be notified.

Q: Which contaminants must be reported?

A: Labs must report all analyses that exceed an established drinking water MCL standard. Reportable MCL categories are:

- Bacteriologicals (all routine and repeat positive total coliform, fecal coliform and E. coli results)
- Inorganic chemicals (Nitrate, Arsenic, etc.)
- Synthetic organic chemicals (Carbofuran, etc.)
- Volatile organic chemicals (Trichloroethylene, etc.)
- Disinfection by-products (TTHMs, HAA5s, Bromate and Chlorite)
- Radionuclides: [Gross alpha (including radium-226), combined radium-226/radium-228, Uranium and Beta/Photon emitters]

The rule does ***not*** pertain to an MCL violation as it relates to compliance. Further, the rule does ***not*** apply to action levels for lead and copper, or to treatment technique standards.

Q: What are the penalties if labs do not report as required?

A: Labs that do not follow the direct lab reporting requirements prescribed in OAR 333-061-0040(1)(b) will be considered as failing to comply with National Environmental Laboratory Accreditation Conference (NELAC) Standard 5.5.10.1, that states:

> *The results of each test, or series of environmental tests carried out by the laboratory shall be reported accurately, clearly, unambiguously and objectively, and in accordance with any specific instructions in the environmental test.*

As with any NELAC standard, failure to comply may be cause to lose accreditation.

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Enforcement of drinking water regulations

by Dave Leland

Formal enforcement action is a tool available to the Department of Human Services (DHS) to assure compliance with drinking water regulations. As a matter of practice and philosophy, the department first attempts to gain compliance with regulations through education, information and assistance. DHS exercises its statutory enforcement authorities to assure or compel compliance with regulations when necessary to maintain credible and effective oversight and to meet its legal responsibilities under state law. In addition, the department is accountable to the US Environmental Protection Agency (EPA) under the Primacy Agreement for assuring specified levels of compliance by Oregon water suppliers with drinking water standards.

In this article, we answer basic questions about the department's enforcement of drinking water standards.

What are the department's legal authorities?

ORS 448.255 requires DHS to give written notice to the water supplier of violations of rules, accompanied by an order requiring remedial actions, that if taken during the time specified in the order will effect compliance with the rule violated. The water supplier can contest the Notice of Violation and Remedial Order in a hearing under the Administrative Procedures Act, and can appeal a final order for cause. The administrative order is a particularly appropriate tool when a water supplier needs an extended period of time in order to design, finance and construct water system improvements to meet standards.

ORS 448.280-285 specifies civil penalties for violations of department rules of up to $500 per day, and up to $1,000 per day for water suppliers serving more than 10,000 people. DHS must give five day advance notice to the water supplier before assessing the penalty. Again, the water supplier can contest the penalty in hearing under the Administrative Procedures Act, and can appeal a final penalty for cause. This tool is appropriate when needed to compel a water supplier to conduct required water quality testing, or to compel a water supplier to return to a schedule of improvements contained in an order.

The department may request the county district attorney to institute a court action in cases of a public health hazard requiring immediate action to protect public health (ORS 448.250). In such a court action, the district attorney may seek an injunction against the water supplier and can ask the court to assign a special master to operate the water system and make improvements. ORS 448.990 specifies criminal penalties (Class A misdemeanor) for violations of department rules or of orders issued by the department.

In addition, DHS can refer a violating water supplier to EPA for enforcement action if the department's enforcement capacity is exceeded, or if the department believes that its available authorities are unlikely to successfully assure compliance in that case.

How many violations of drinking water standards occur?

There are currently about 2,700 EPA public water systems in Oregon, and EPA-established standards for 91 different drinking water contaminants that water suppliers must meet. There are currently about 75 specifically defined violation types; these include violations of maximum contaminant levels for each regulated drinking water contaminant, violations of treatment technique requirements, violations of monitoring and reporting requirements for each contaminant, violations for public notification requirements, and so on.

In short, there are many opportunities for water suppliers to violate the individual drinking water regulations. Since 1996, DHS has prepared an EPA-required Annual Compliance Report that details all the violations identified during the year. *Figure 1* shows the total numbers of violations in Oregon and the number of water systems in violation for each year as reported by the department to EPA. The figure shows a generally declining number overall of total violations and numbers of water suppliers in violation. Also evident are increasing spikes of numbers of violations every three years. These correspond to the required testing every three years for volatile organic/synthetic organic/inorganic chemicals. Water suppliers who fail to submit these results are assigned nearly 60 individual violations each, one for each contaminant. Increasing numbers of small water systems are failing to submit these tests. Apart from the spike years, it appears that water suppliers who violate the regulations have an average of two violations per year.

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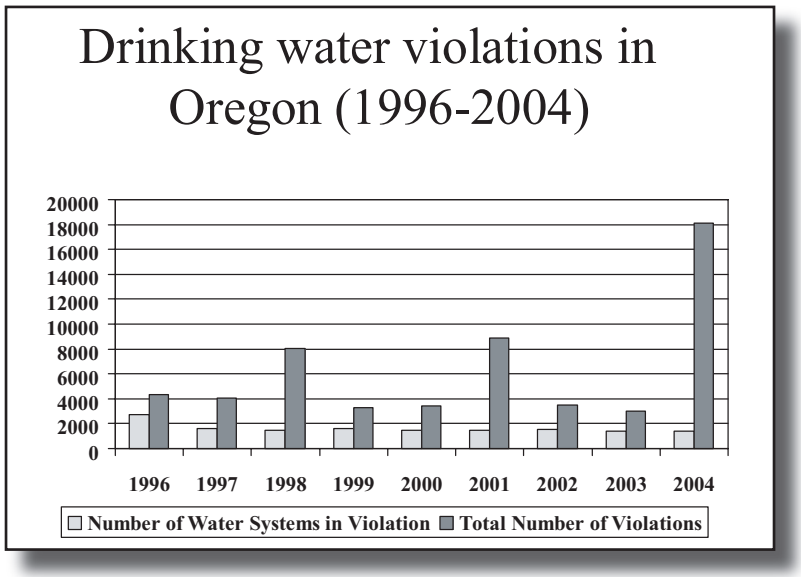


Figure 1. — Drinking water violations in Oregon (1996–2004)

What are the department's enforcement obligations under *primacy*?

EPA established basic requirements for state programs under primacy. Under the federal Safe Drinking Water Act, states with primacy must adopt state regulations no less stringent than EPA regulations, and implement adequate procedures for the enforcement of these state regulations. EPA requires states to take "timely and appropriate" enforcement actions on water suppliers that are in "significant noncompliance" with drinking water regulations, specifically community water suppliers regardless of population served and those non-transient non-community and transient non-community water suppliers serving more than 500 people.

Significant noncompliance is very specifically defined by EPA for each of the drinking water regulations, and usually includes multiple violations over a time period. The significant noncompliance concept helps DHS focus its limited program resources on those water systems most likely to present a risk to public health, rather than attempting to enforce on every individual violation that occurs. Here are a few examples of EPA definitions of "significant noncompliance:"

- Total coliform bacteria maximum contaminant level (monthly monitoring): four acute or monthly violations of the MCL in any 12 consecutive months.
- Total coliform bacteria monitoring and reporting (monthly monitoring): six combined major repeat monitoring, major routine monitoring, and/or maximum contaminant level violations in any 12 consecutive months.
- Nitrate maximum contaminant level: greater than 10 mg/l
- Chemical monitoring: Failing to monitor for or report the results of any regulated contaminant for two consecutive compliance periods.
- Lead and copper: Failing to install optimal corrosion control treatment on time and has a 90th percentile lead level of 30 ppb or more in the most recent monitoring period.

Once a water supplier becomes a significant non-complier (or SNC), EPA requires the department to take appropriate enforcement action within eight months, unless the water supplier has resolved the compliance problem. EPA recognizes all of the department's enforcement authorities described above as appropriate. As long as the water supplier is in compliance with the remedial action schedule contained in a department order, EPA remains satisfied with the water supplier's noncompliance status. EPA also recognizes a bilateral compliance agreement as an appropriate action; this is a mutual agreement between the department and water supplier specifying a schedule for achieving compliance.

If the department fails to take timely and appropriate action within eight months on an identified significant non-complier, and the water supplier fails

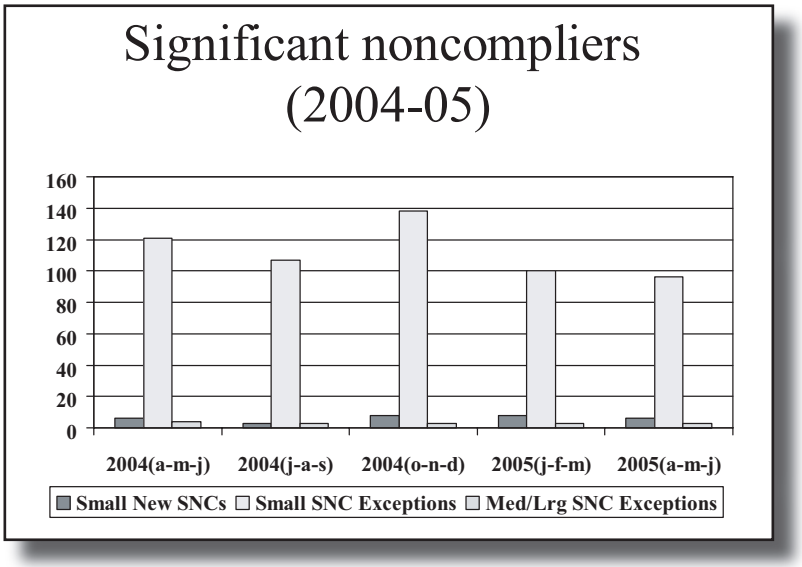


Figure 2. — Significant non-compliers (2004–05)

to achieve compliance, then EPA identifies that water supplier as a "SNC exception." EPA may take direct action against that water supplier and can apply fiscal penalties against the department by withholding program support funds.

How are SNCs identified?

The department identifies violations based on test results and other information submitted by water suppliers using an EPA-provided database called the Safe Drinking Water Information System (SDWIS-State). The department uploads the violations calculated by SDWIS-State to EPA each quarter.

EPA then determines which water suppliers are significant non-compliers, and reports those back to the department at which point the eight month clock is already ticking. *Figure 2* shows the number of new significant non-compliers identified each quarter, and the number of significant non-complier exceptions. Oregon significant non-compliers are primarily small water systems serving 3,300 or fewer people.

What is the department's enforcement status?

The department issued and completed nearly 1,500 enforcement actions since taking on *Primacy* in 1986 *(Figure 3)*. The department has used the following enforcement tools described earlier: Notices of Violation, Administrative Orders, Notices of Intent to Assess Civil Penalties, Civil Penalties, direct court action, and referral to EPA. Several surges in enforcement actions are evident. In 1988, the department issued notices of violation to water suppliers to compel radiological monitoring. In 1992 and 1994, the department issued notices of violation and administrative orders to water suppliers to install filtration for surface water sources, and to water suppliers who failed to conduct organic chemical monitoring. In 1995 and 1998, the department issued notices of violation to water suppliers to compel monitoring for lead and copper at the tap.

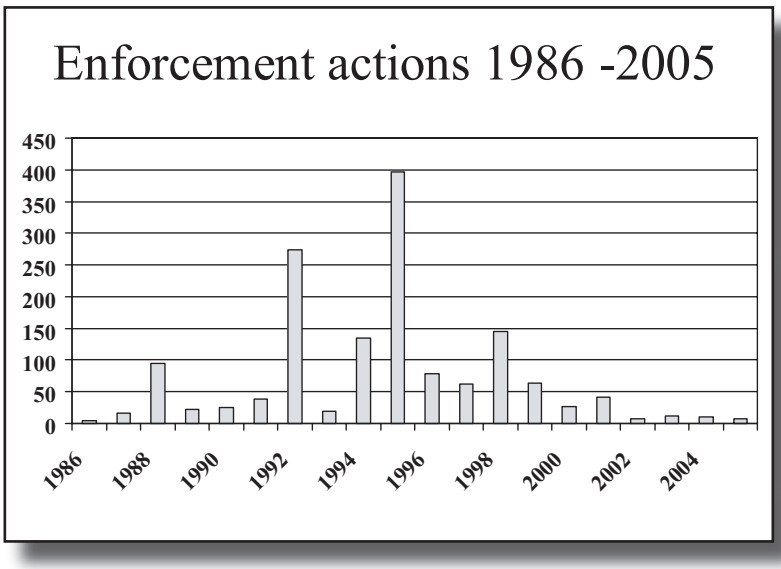


Figure 3. — Enforcement actions 1986–2005

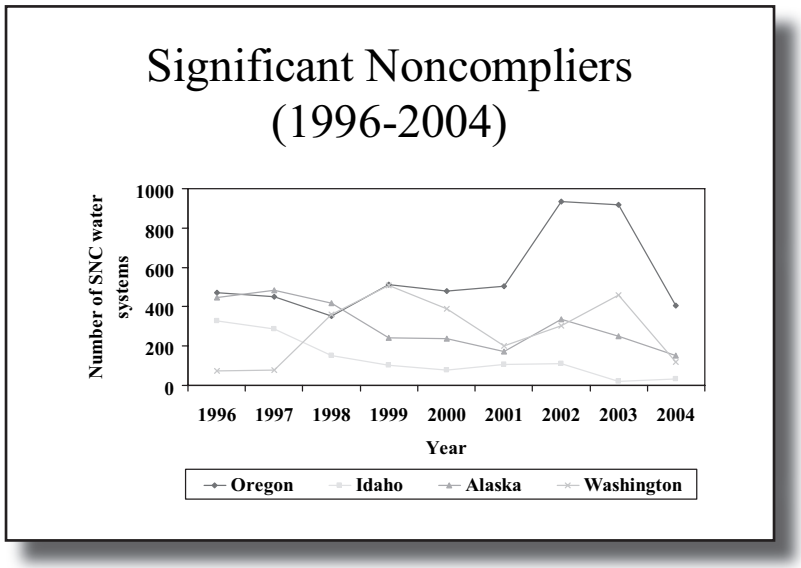


Figure 4. — Significant non-compliers (1996–2004)

Even this level of enforcement activity proved insufficient to get the whole job done. By 2002, Oregon had accumulated almost 1,000 significant non-compliers including exceptions, far more than other northwest states *(Figure 4)*. Department staff and county health department partners redirected program work to resolve these, with very good success. By 2004 the number of SNCs dropped by nearly 60 percent, but still exceeded the number of SNCs in other northwest states.

Figure 5 presents the population served by the significant non-compliers presented in *Figure 4.* In 2004, Oregon SNCs served about 100,000 people out of the statewide population served of 3.2M, fewer than most other northwest states. In Oregon, the overwhelming majority of water suppliers in significant noncompliance are small and very small public water systems.

During 2006, department and county staff committed by agreement with EPA to address 204 of the remaining SNC exceptions. This requires significant research and time commitment by staff to determine the violations which caused

Continued on page 8

the exception status, contacting each water system to inform them of what is needed to resolve the violations, and track the progress of each water system to resolution and compliance. As of March 31, there were 58 water systems remaining to be addressed of which an estimated 50 percent will be unable to resolve the violations and will receive enforcement actions by the end of September 2006.

The enforcement future

In 2006, the department agreed with EPA to address 100 percent of large and medium sized community and non-transient non-community SNCs for microbial standards, nitrate, lead, other chemicals and consumer confidence reports. The department also agreed with EPA to address 90 percent of small sized community and non-transient non-community SNCs for microbial standards, and 85 percent of small SNCs for nitrate, lead and other chemicals. The department's current efforts are focused on achieving those outcomes.

The attached table lists the department's current active enforcement cases. This list is presented to illustrate the department's enforcement efforts, and we will periodically publish updated listings in future editions.

How do you check your water system compliance status?

You can check on your water system's compliance status using the "data online" menu function on the drinking water Web site at *www.oregon.gov/dhs/ph/dwp.* You can look at both sample results received by the department, and the violations identified by the department. Note that we only display coliform bacteria and surface water treatment rule violations for the most recent three years.

Please contact us if you find discrepancies in your water system record. Let's work together to assure that your water system's compliance record is displayed accurately and completely, and that drinking water safety is assured!

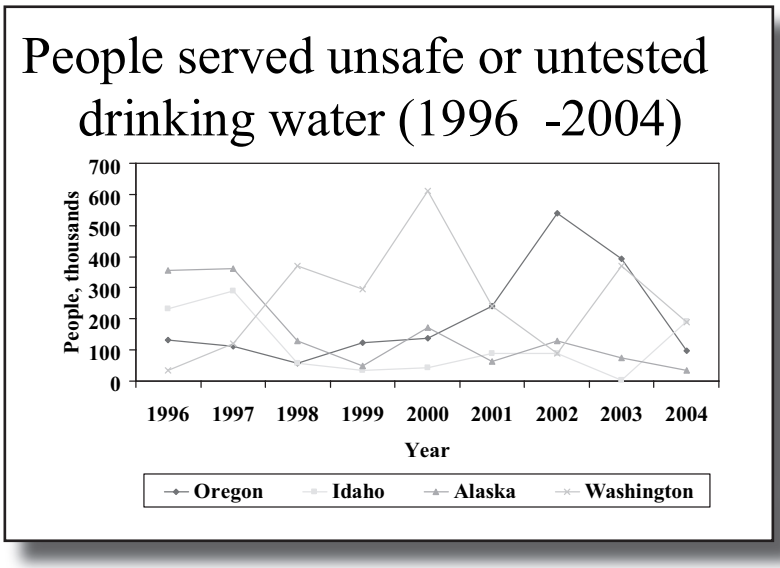


Figure 5. — People served unsafe or untested drinking water (1996–2004)

Dave Leland, PE, is Manager of the Drinking Water Program / (971) 673-0415 or david.e.leland@state.or.us

ACTIVE ENFORCEMENT ACTIONS

As of
May 26, 2006

Water supplier	PWS ID #	Violations summary	Issue date	Final compliance date
APPLEBLOSSOM MOBILE HOME PARK	OR4100728	Coliform and disinfectant by-products monitoring and reporting	May 24, 2006	August 1, 2006
BOULDER CREEK WS/ROSE LODGE	OR4100722	Complete surface water treatment rule construction	November 24, 2004	December 1, 2006
BREWSTER COMMUNITY HOMEOWNERS	OR4100762	Chemical monitoring and reporting	May 18, 2006	December 31, 2006
CANBY REGENCY	OR4100163	Provide certified operator	Jan 31, 2006	June 1, 2006
COTTAGE GROVE, CITY OF	OR4100236	Complete surface water treatment rule construction	July 13, 2005	March 1, 2007
CURRINSVILLE MOBILE HOME PARK	OR4100266	Correct water system coliform deficiencies	April 17, 2006	August 1, 2006
LAMONTAI IMPROVEMENT WATER DISTRICT	OR4100238	Coliform monitoring and reporting	August 1, 2005	September 1, 2006
MT TERRACE MOBILE HOME PARK	OR4105364	Notice of Intent to Assess Civil Penalties	May 12, 2006	July 31, 2006
OLALLIE LAKE RESORT	OR4194426	Correct water treatment deficiencies	March 3, 2006	August 1, 2006
PRAIRIE CITY	OR4100673	Complete construction of new water treatment system	March 3, 2006	August 15, 2006
SCOTTS MILLS, CITY OF	OR4100797	Lead and copper sampling and reporting	February 17, 2004	September 1, 2006
SHANGRI-LA LA WATER DISTRICT	OR4100835	Lead and copper sampling and reporting	August 1, 2005	July 1, 2006
SHIELD CREST WATER ASSOCIATION	OR4101500	Lead and copper sampling and reporting	December 28, 2005	September 1, 2006
ST HELENS, CITY OF	OR4100724	Complete surface water treatment rule construction	February 2, 2006	January 13, 2006
SWEET HOME, CITY OF	OR4100851	Complete construction of new water treatment system and system start up	December 15, 2005	January 1, 2008
WEISS ESTATES WATER SYSTEM	OR4105581	Chemical and disinfectant by-products monitoring and reporting	March 27, 2006	September 30, 2006

Groundwater under surface water influence determinations: Non-community water systems

by Dennis Nelson and Karen Kelley

The Surface Water Treatment Rule, designed to protect public water systems from the risk of *Giardia* and *Cryptosporidium*, has as its primary focus those water systems that use surface water as a source of drinking water. The rule also addresses, however, those groundwater systems that, because of the location of the source, or because of the aquifer's characteristics, derive at least part of their water from a surface water source. States were required to develop a process for identifying water systems that were under the "direct influence of surface water." Oregon did so and initiated the process beginning with community water systems. Those have largely been completed and it is now time to turn to the non-transient and transient non-community water systems for a similar evaluation.

The criteria for whether a water system needs evaluation include:

- The drinking water source is within either 500 feet for fractured bedrock, or 200 feet for alluvium (sand and gravel), of a perennial or intermittent surface water body, and
- The source has a confirmed or suspected history of coliform bacteria, or
- The aquifer is judged as unconfined, or
- The source construction is judged as inadequate with respect to protecting the source from the surface water source.

The recently completed Source Water Assessment project evaluated the above criteria for each non-transient and transient non-community water system and was able to eliminate a significant number (> 1200) of these systems from further evaluation. Those non-transient and transient non-community water systems that were not eliminated from review will be required to complete monthly coliform testing of raw water from the source for a period of up to 24 months. These systems will be notified this summer and will be expected to begin the coliform monitoring this fall. A confirmed positive coliform

test indicates that the system may be susceptible to *Giardia* and *Cryptosporidium*. As a result, the system must have two microscopic particulate analyses (MPAs) of their raw source water completed within 12 months of the coliform positive date. MPAs evaluate the water sample for surface water indicators such as diatoms and other algae. *Giardia* is similar in size to these indicators and the logic is that if the surface water indicators are there, it is possible that *Giardia* and *Cryptosporidium* may be there as well.

If a positive coliform sample is confirmed, no further coliform sampling needs to be accomplished prior to or after the MPAs. Failure to complete the monthly coliform testing, i.e., missing two consecutive months or three or more months out of a given year, will also lead to the MPA testing requirement. Further information will be provided to those systems at that time.

MPA samples should be collected no closer than 30 days from each other and should be collected at high river stage, normally in the period of February to May. Systems may take both samples in a given year or one sample during each of two consecutive years.

For more information contact Karen Kelley at 541-726-2587 ex 22.

Dennis Nelson is a geologist in the Drinking Water Program / (541) 726-2587 ext. 21 or dennis.o.nelson@state.or.us

Karen Kelley is an environmental health specialist in the Drinking Water Program / (541) 726-2587 ext. 22 or karen.e.kelley@state.or.us

Training calendar

CEUs for Water System Operators

Check *www.oesac.com* for offerings approved for drinking water CEU credit.

OAWU

(503) 873-8353

OAWU strives to ensure CEU awarding, however they are unable to guarantee acceptance for class CEUs for certifications by regulatory agencies.

Aug. 21-23	Summer Classic XII
Oct. 5-6	WT/WD Certification Review
Oct. 11-12	WT/WD Certification Review

Cross Connection/Backflow Courses

The following courses are offered by Backflow Management Inc. (B)

(503) 255-1619

Clackamas Community College (C)

(503) 657-6958 ext. 2388
Contact them directly for place and time information

Backflow Assembly Tester Course

Aug.28-Sept.1	Portland (B)
Sept. 11-15	Clackamas (C)
Oct. 2-6	Portland (B)
Oct.30-Nov.3	Portland (B)

Backflow Assembly Tester Recertification

Sept. 1	Portland (B)
Oct. 6	Portland (B)
Oct. 20	Clackamas (C)
Nov. 3	Portland (B)

Cross Connection Inspector Course

Nov. 6-9	Portland (B)
Nov. 13-16	Clackamas (C)

Cross Connection Inspector Recertification

Nov. 7	Portland (B)
Nov. 17	Clackamas (C)

Small Water System Training Course

Department of Human Services

Marsha Fox/(971) 673-0408

July 26	Eugene
July 25	Pendleton
Sept. *	Klamath Falls & Bend
Oct. *	Newport & Dallas
Nov. *	Tillamook & St. Helens

* Dates to be announced

Direct Lab Reporting Procedure —
continued from page 4

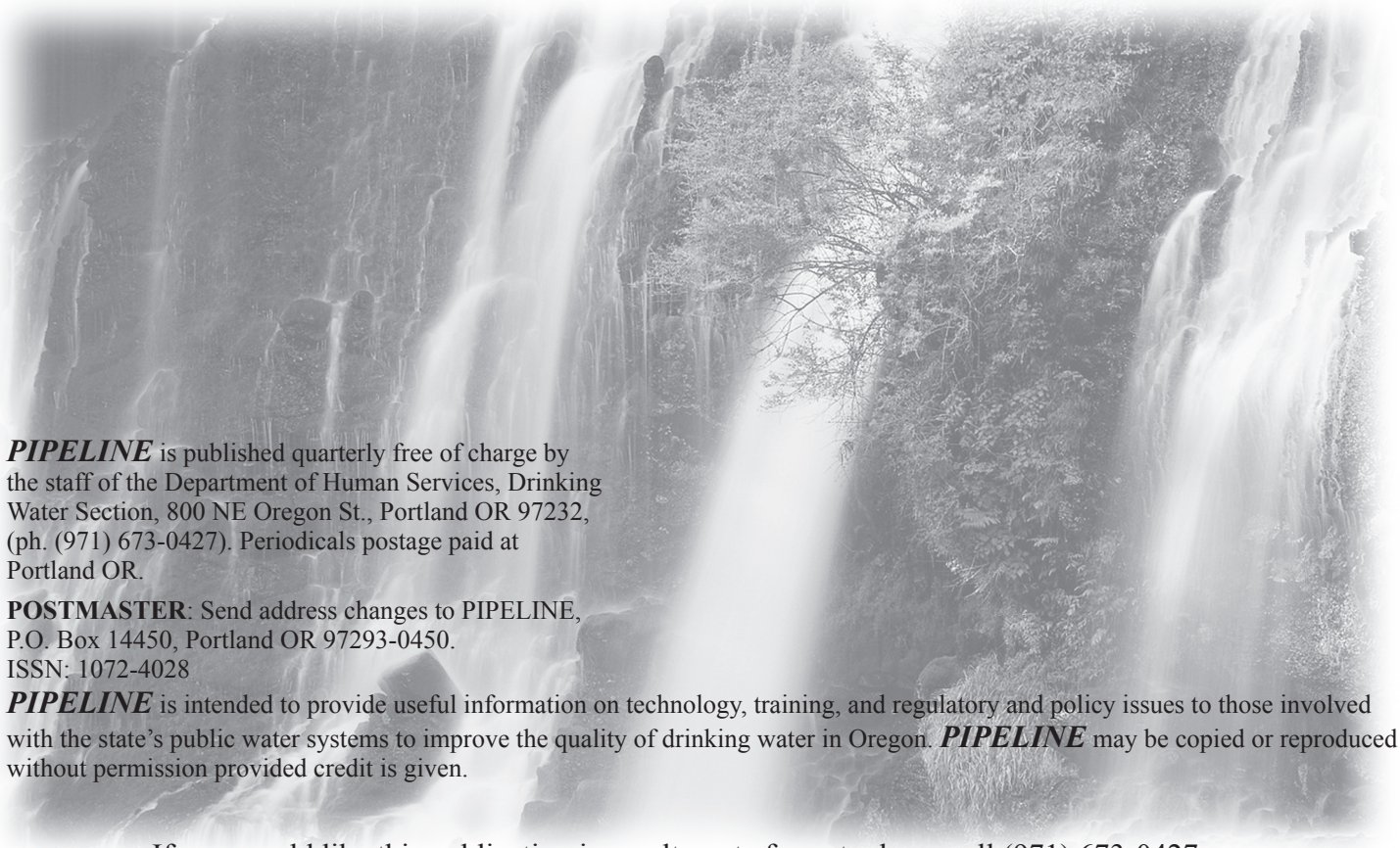
Q: Does the laboratory need to report an analysis challenged by a client or if the lab is requested to change the sample type (e.g. "Routine" to "Special") after the results have been determined?

A: The lab must request the water supplier to provide a written explanation for any change request. The lab must then FAX the analytical results, accompanied by the explanation, to DHS-DWP for evaluation and follow-up.

QUESTIONS?

Don't hesitate to ask. Please direct all inquiries to Diane Stockton, manager, Data Management and Compliance Assurance Unit, DHS Drinking Water Program, (971)673-0424 *diane.g.stockton@state.or.us*

Department of Human Services
Drinking Water Program
PO Box 14450
Portland, OR 97293-0450



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