



PUBLIC HEALTH DIVISION  
Drinking Water Services

John A. Kitzhaber, MD, Governor

Oregon  
**Health**  
Authority

800 SE Emigrant Avenue, Suite 240  
Pendleton, OR 97801  
Phone: 541-276-8006  
Fax: 541-276-4778  
<http://healthoregon.org/dwp>

September 29, 2014

Stan Crawford  
2685 Lexington Terrace  
West Linn, OR 97068

**Re: Water System Survey Significant Deficiencies/Rule Violations  
Green Acres MHP, PWS #4100523**

Dear Stan:

A water system survey was completed for Green Acres MHP on 5/30/2012 identifying significant deficiencies and rule violations to be corrected. A letter and copy of the survey report were mailed to your attention on 7/5/2012. Oregon Administrative Rule (OAR) 333-061-0076(6) and OAR 333-061-0032(6)(e) requires water systems that use groundwater sources to have completed corrective action or be in compliance with a Department-approved corrective action plan within 120 days of receiving written notice of a significant deficiency.

Green Acres MHP was to complete corrective action by 11/8/2012 or have a Department-approved corrective action plan with a reasonable timeframe to complete the corrective actions. To date, no information has been received. As a result, the Green Acres MHP is in violation and is now subject to formal enforcement which could include the assessment of civil penalties. In order to return to compliance and avoid formal enforcement action, your corrective action plan for the significant deficiencies **must be received and approved by 10/29/14**. Please send information to: Drinking Water Services, 800 SE Emigrant #240, Pendleton, OR 97801. A copy of the survey letter is enclosed for your reference. The water system is required to correct all survey deficiencies by 12/31/14.

This has been the third deadline set for the water system, with little communication with DWS on the progress of the work being done. The letter is also being sent to our enforcement coordinator for his review. Of the seven deficiencies noted at the time of the survey, one has been corrected.

**You are now required to distribute a public notice explaining the failure to correct the deficiencies to every tenant.** A template of the public notice has been enclosed with this letter. You are also required to issue a repeat notice every three months until all deficiencies are corrected or you are in compliance with an approved corrective action plan.

A dated copy of the public notice must be sent to the Oregon Health Authority - Drinking Water Services, PO Box 14350, Portland, OR 97293-0350 within ten (10) days after completion to certify that the Green Acres MHP has fully complied with the distribution and public notification requirements.



The following items still must be addressed:

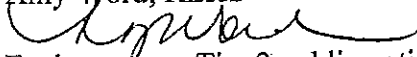
- 1) **Well does not meet setbacks from hazards** – DWS is aware of the upgrades the water system is undertaking to replace the existing pressure tank and chlorination system. The new contact and pressure tanks were inspected by DWS on June 23, 2014, however they are still not in operation. Once the new tanks are online, the old pressure tank can be removed thus enabling the well driller to come in and formally abandon the old well that is causing the setback violation.
- 2) **Chlorine injection point does not meet construction standards** – The absence of a check valve to prevent chlorinated water from flowing back into the well will be addressed when the system upgrades are completed.
- 3) **No cross connection ordinance** – All community water systems are required to have a cross connection ordinance in place. This protects the water system from potentially hazardous substances by either requiring a backflow device be installed on the connection, or not allowing the connection at all. Claudia mentioned a standard rental agreement is used with the tenants. It needs to be reviewed to see if there is any verbiage regarding cross connections in the agreement or if you need to have an addendum agreement that the tenants need to sign. Examples of cross connection wording have been sent to you.
- 4) **No operations and maintenance manual** – This manual is critical to have all needed information regarding the operation of the water system in one location. Details of the source, chlorination, emergency shut down procedures, maps of shut off valves, chemical monitoring, and a coliform sampling plan are to be included. Information has been resent that can assist in this manual creation.
- 5) **No consumer confidence report** – This is an annual report requirement for community water systems. A report is to be sent to your tenants by July 1 every year discussing the previous year's water quality. There is information on our website that can assist in the creation of this document. <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/Monitoring/Pages/ccr.aspx> A certification form is also to be sent to DWS after the CCR has been distributed. There has not been a CCR submitted to DWS in the past 4 years.

Please contact me by phone at 541-966-0901 or via email at [amelia.a.word@state.or.us](mailto:amelia.a.word@state.or.us) if you have questions or comments.

I appreciate your immediate attention to this matter.

Sincerely,

Amy Word, REHS



Enclosures: Tier 2 public notice template  
Survey letter

cc: OHA-DWS Portland file  
Claudia Allen, Green Acres MHP  
Brad Daniels, DWS Enforcement