

February 11, 2015

Paul Miller
Totem Village MHP
10330 SW View Terrace
Tigard, OR 97224

RE: Notice of Non-Compliance regarding the Totem Village MHP Public Water System, PWS OR4101171

Mr. Miller:

Our records indicate that you own the Totem Village MHP (Totem) water system located at 36451 S Sawtell Rd, Molalla, Oregon. Therefore, you are a water supplier as defined in Oregon Revised Statute (ORS) 448.115(12) and Oregon Administrative Rule (OAR) 333-061-0020(207) and have specific responsibilities as defined in OAR 333-061-0025.

The Totem water system is a community public water system which serves approximately 80 people and is subject to regulation under ORS 448.115 to 448.290 and OAR 333-061-0005 to 333-061-0272.

The Oregon Health Authority, Public Health Division, Center for Health Protection, Drinking Water Services (DWS) has reviewed the operation of the Totem water system. This review has found that you are not in compliance with the following Oregon Administrative Rules, and are, therefore, not meeting your responsibilities as a water supplier as prescribed by the Oregon Drinking Water Quality Act (ORS 448.115 to ORS 448.290) and rules.

DESCRIPTION OF RULE VIOLATIONS

- Violation No. 1: OAR 333-061-0036(7) requires sampling for radionuclides at all community water systems. DWS records show that radionuclide sampling has been required since 2010, However, DWS has not received the required results for the Totem water system. This constitutes a violation of the rule if samples were, in fact, not collected.

- Violation No. 2: OAR 333-061-0036(2)(c) requires sampling for lead and copper at all community public water systems. DWS notified Tim Thompson, the administrative contact for the Totem water system, in a letter dated August 25, 2014 that lead and copper results had not been reported for the most recent monitoring period, January 1, 2011 to December 31, 2013. The failure to report lead and copper sampling results constitutes a violation of the rule if samples were, in fact, not collected.

ACTIONS REQUIRED TO ACHIEVE COMPLIANCE

Due to the rule violations identified above, you are required to complete the following actions relating to the Totem water system:

- Compliance Action No 1: Collect radionuclide samples in accordance with OAR 333-061-0036(7) and report sample results to DWS no later than **April 10, 2015**.
- Compliance Action No. 2: Collect lead and copper samples in accordance with OAR 333-061-0036(2)(c) and report sample results to DWS no later than **August 15, 2015**.
 - Lead and copper samples must be collected after **June 1, 2015**, which has been determined to be the start of the warmest part of the year. Samples collected before June 1, 2015 will not qualify for compliance or satisfy this compliance action.

If you do not comply with the deadlines specified in this letter, the continued non-compliance may result in additional enforcement action including the assessment of civil penalties as prescribed by OAR 333-061-0090. Please contact Joel Ferguson at Clackamas County Environmental Health at 503-742-5367 to discuss the compliance actions specified in this letter.

Respectfully,



Janet Brock
Compliance Specialist
OHA - Drinking Water Services

cc: Joel Ferguson, Clackamas County Environmental Health
Pete Farrelly, Oregon Health Authority, Drinking Water Services