



November 23, 2020

Todd Honeywell
7300 SW Jordan Rd
Culver, OR 97734

**RE: Microscopic Particulate Analysis Sampling Requirement
Public Water System #4191036 – OPRD Cove Park-Deschutes**

Dear Todd:

This letter acknowledges that the July 28, 2020, annual assessment sample collected from the OPRD Cove Park-Deschutes water system in conformance with the Oregon Administrative Rules (OAR 333-061-0036 (6)(k)(A) was confirmed *E. coli* positive on July 31, 2020 (<https://go.usa.gov/x7XYa>). As a follow-up to the *E. coli* confirmation, the well construction and the potential for Well #1 - [L79396](#) (SRC-AA) to be under the direct influence of surface water were reviewed.

The evaluation for Ground Water Under the Direct Influence (GWUDI) of surface water is a two-step process, and the criteria for the first step of determining whether or not surface water is contributing to your source are the following (see enclosed *GWUDI Determination FAQ*):

- The drinking water source is within either 500 feet for fractured bedrock or 200 feet for alluvium 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 susceptible based on local hydrogeology, OR
- The source construction is judged as inadequate with respect to protecting the source from the surface water source.

The evaluation process has determined the following for your drinking water source:

- Well #1 - [L79396](#) is constructed approximately 20 feet from the Deschutes River in a sand and gravel aquifer (unconsolidated landslide deposits),
- The presence of *E. coli* in the source has been confirmed, and
- The aquifer is highly sensitive (i.e., unconfined and susceptible to contamination from surface water), and
- The source construction is judged inadequate with respect to protecting the source from surface water influence.

Because Well #1 - [L79396](#) meets the four criteria, OPRD Cove Park-Deschutes has the potential to be under the direct influence of surface water. The next step in determining whether your source is under the direct influence of surface water is the collection of samples for Microscopic Particulate Analysis (MPA). The MPA specifically searches for the presence of surface water organisms, including diatoms and other algae, in the raw water sample (see enclosed Microscopic Particulate Analysis Fact Sheet).

OPRD Cove Park-Deschutes will need to collect two MPA samples from Well #1 - [L79396](#) during the 2020-2021 operating season. The first sample should be collected this fall/early winter (November/December) after a significant precipitation event.

The second sample should be collected during an extended period of low precipitation and when maximum demand (i.e., high water usage or when the reservoir is filled from a low water level) occurs at the water system. High water usage typically occurs during the period from July to September. The second MPA should be collected no later than September 15, 2021.

Prior to sample collection, DWS recommends that the water system plan in advance with an MPA testing laboratory to make certain that the company can conduct the testing and, if needed, rent the MPA sample equipment. See the enclosed list for laboratories that provide Microscopic Particulate Analysis.

If assistance with the collection and analysis of the MPA samples is needed and the water system is eligible (community water systems serving populations under 10,000, as well as **not-for-profit** transient and non-transient water systems are eligible), OPRD Cove Park-Deschutes can use Drinking Water Services' free Circuit Rider service currently provided by Civil West Engineering (see link below for more information):

- <https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/DRINKINGWATER/OPERATIONS/Pages/circuitrider.aspx>.

The Circuit Rider can provide MPA sample collection and shipping and arrange for MPA analysis through a laboratory that conducts the MPA testing.

If you have any questions, please contact me at 541-726-2587 (ext. 26) or by email at russell.a.kazmierczak@state.or.us.

Sincerely,



Russell Kazmierczak
Natural Resource Specialist

Enclosures

CC: Michelle Byrd, OHA-DWS Portland (email)
OPRD Cove Park-Deschutes (PWS ID: #4191036) Master File, OHA-DWS Portland (email)
Max Hamblin, Jefferson Co. Environmental Health (email)

Groundwater Under the Direct Influence (GWUDI)

The federal Surface Water Treatment Rule requires that all public water systems that use surface water, or use groundwater under the direct influence of surface water, meet performance standards of filtration and disinfection to deactivate pathogenic organisms within the water. This requirement is addressed in Oregon in Administrative Rule 333-061-0032.

What is groundwater under the direct influence (GWUDI)?

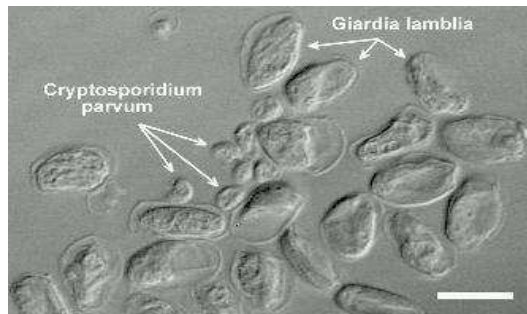
Groundwater under the direct influence (GWUDI) of surface water occurs when, because of its proximity to surface water and the character of the aquifer, pathogenic organisms can move from the surface water source to the well or infiltration gallery.

What are the public health concerns associated with GWUDI?

Pathogens, such as *Giardia* and *Cryptosporidium*, are often found in surface water, and can cause gastrointestinal illness and other health risks. In many cases, this water needs to be filtered and disinfected through the use of additives such as chlorine to inactivate (or kill) microbial pathogens.

Cryptosporidium is a significant concern in drinking water due to the fact it is resistant to chlorine and other disinfectants; it responsible for waterborne disease outbreaks that have caused severe illness. It may be especially harmful to people with weakened immune systems (e.g., infants and the elderly) and potentially fatal in people with severely compromised immune systems (e.g., cancer and AIDS patients).

In the photomicrograph on the top right of this page, *Giardia* and *Cryptosporidium* are shown as seen through a microscope. These organisms are very small. The white bar in the diagram is approximately 10 microns (0.0004 inches) in length.



Because of their small size, *Giardia* and *Cryptosporidium* can readily move through the open spaces in the aquifer, i.e., through the openings between sand and gravel size particles or in fractures in bedrock. However, the farther they travel the more likely it is that they will be filtered out of the water by natural processes. Through previous studies, we believe that the risk related to these organisms is substantially reduced after travel of 200 feet in sand and gravel, and after 500 feet in fractured bedrock or layered volcanic rocks.

What's involved in determining GWUDI?

Analysis of water for *Giardia* or *Cryptosporidium* is complex and costly. The EPA has indicated that monitoring source water for coliform bacteria may serve as a useful surrogate for the other pathogens. Consequently, we will require monthly coliform testing at the wellhead of the source for a period of up to 12 months. If at any time, the system fails to monitor, or experiences a confirmed positive E. Coli test, the water system would be required to have two microscopic particulate analyses performed on the water. (Refer to next page: The MPA)

Fact Sheets on *Giardia* and *Cryptosporidium* are available at:

<http://www.cdc.gov/parasites/crypto/>

For more information on GWUDI please see the attached link:

<http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Pages/gwudi.aspx>

State of Oregon Drinking Water Services
Groundwater Under the Direct Influence of Surface Water
Determination Process - Frequently Asked Questions
Updated October 15, 2013

What is Groundwater Under the Direct Influence (GWUDI)?

The federal rule defines Groundwater Under the Direct Influence of Surface Water as:

“Any water beneath the surface of the ground with significant occurrence of insects or other macroorganisms, algae, or large-diameter pathogens such as *Giardia lamblia* or *Cryptosporidium*, or significant and relatively rapid shifts in water characteristics such as turbidity, temperature, conductivity, or pH which closely correlate to climatological or surface water conditions” (40 CFR 141 definition).

GWUDI basically means the groundwater source is located close enough to nearby surface water, such as a river or lake, to receive direct surface water recharge. Since a portion of the groundwater source’s recharge is from surface water, the groundwater source is considered at risk of contamination from pathogens such as *Giardia lamblia*, *Cryptosporidium*, and viruses, which are not normally found in true groundwaters.

How are Public Water Systems determined to be potentially under the influence of surface water?

Oregon Administrative Rule (OAR) 333-061-0032 (8) requires that all (except hand pump operated systems such as campgrounds) Public Water Systems (PWS) using groundwater as a source of drinking water must evaluate their source(s) for the potential to be under the influence of surface water (see OAR for Public Water System link at the end of this document). The following is the criteria for determining if a groundwater source (wells, springs, and infiltration galleries) is susceptible to direct surface water influence:

- 1) The source must be within 500 feet of a surface water source (year round or intermittent/seasonal) and meet one of the following hydrogeologic setting-surface water setback criteria as determined by the Source Water Assessment or another hydrogeologic study approved by the Authority (see OAR 333-061-0032 (8)(c) for study requirements);
 - A sand aquifer and is within 75 feet of surface water;
 - A sand and gravel aquifer and is within 100 feet of surface water;
 - A coarse sand, gravel, and boulder aquifer and is within 200 feet of surface water;
 - A fractured aquifer or layered volcanic aquifer and is within 500 feet of surface water; or
 - Greater distances if geologic conditions or historical monitoring data indicate additional risk at the source; and there is a history of microbiological contamination in the source (e.g., water system is using a treatment system to disinfect the source water, detections of total coliform or *E. coli*); or

- 2) The Source Water Assessment or some other hydrogeologic study approved by the Authority determines the source is highly sensitive as a result of aquifer characteristics (e.g., unconfined or fractured bedrock aquifer), vadose zone characteristics (e.g., soil permeability), monitoring history (e.g., confirmed *E. coli* or repeated detections of total coliform in the source) or well construction (e.g., casing seal unknown, inappropriate casing seal material, inadequate grout seal or depth).

What does the State of Oregon require if a groundwater source has been determined to be susceptible to surface water?

If the groundwater source meets one of the previously referenced distance criteria and either has a source water bacteria problem or the source has been determined to be highly sensitive, then the water system will have to evaluate the source water (prior to any treatment) monthly for the presence of *E. coli*.

Since the analysis of water for *Giardia lamblia* or *Cryptosporidium* is complex and costly, the EPA has indicated that monitoring source water for coliform bacteria may serve as a useful surrogate for the other pathogens. The process for using coliform bacteria as a surrogate requires that the water system perform raw water coliform testing monthly at the source for a period of up to 12 months for year round systems and during the months of operation for seasonal systems. The samples used for the evaluation process need to be marked as Assessment (see Microbiological Analysis (Coliform) Laboratory Form link at the end of this document).

If any of the “Assessment” samples test positive for *E. coli*, then the water system needs to collect five additional samples from the source within 24 hours. The five additional samples will need to be marked as Confirmation. If any of the “Confirmation” samples are also *E. coli* positive, the sample result is considered confirmed and the water system is required to implement corrective action, which may include the installation of interim treatment for the 4-log inactivation of viruses before or at the first customer. In addition to performing corrective action, the water system will be required collect samples for Microscopic Particulate Analysis (MPA). A water system also can be required to move on to the MPA if 33% or more of the “Assessment” samples test positive for total coliform.

Note: Public water systems that are required to evaluate their source(s) for direct influence of surface water may submit the results of a Hydrogeologic Assessment to demonstrate that the water system is not potentially under the direct influence of surface water (see OAR 333-061-0032(8)(c))(A-D) for additional information).

What happens if the source water results indicate that MPAs are required?

Source water that has been confirmed positive for *E. coli* or has 33% or more of its monthly assessment samples test positive for total coliform indicates that the water system may be at risk from *Giardia lamblia* and *Cryptosporidium*. The current method in Oregon to determine if a water system is under the influence of surface water is to conduct a MPA on the source water prior to any treatment.

The purpose of the MPA is to evaluate the source water for the occurrence of surface water organisms in general, e.g., diatoms and other algae, and generate a relative risk factor for pathogenic organisms.

To determine if the system is GWUDI, a minimum of two MPAs need to be performed on the raw source water within 24 months of the *E. coli* positive date. The MPA samples will need to be collected during the PWS identified high risk period(s) of the year, and a minimum of 30 days apart or at other time periods specified by the Authority. For more information on the groundwater/surface water interaction process, sample collection procedures, and MPA risk scoring, see the MPA Fact Sheet link at the end of this document.

Which laboratories conduct the MPA analysis and how much does it cost?

The approximate equipment rental and analytical cost ranges from \$250-400 per sample event (shipping not included). Only a few labs in the region have the ability to do the MPA analysis. Drinking Water Services maintains a partial list of labs that perform the testing and rent the sampling apparatus. Currently, laboratories do not need to be certified by the State of Oregon, they only need to conduct the MPAs according to EPA's consensus method (see list of Laboratories that Provide MPAs link at the end of this document).

What happens if the MPA risk scoring indicates that the source water is under the influence of surface water?

Public water systems that use groundwater under the direct influence of surface water as a source of their drinking water must comply with the federal Surface Water Treatment Rule and the Long Term Enhanced Surface Water Treatment Rule (LT1 and LT2). Compliance with these rules will generally require a minimum of 3-log treatment (removal and/or inactivation) for *Giardia lamblia* and 2-log removal of *Cryptosporidium* (see OAR 333-061-0032 for detailed information regarding treatment options). On the next page is a list of surface water treatment options for GWUDI systems:

Removal/Filtration

- Cartridge/Bag (contact Drinking Water Services for a list of approved filters)
- Slow Sand
- Membrane
- Conventional/Direct
- Riverbank

Inactivation/Disinfection

- UV
- Chlorine Dioxide
- Ozone
- Chlorine (treatment credit for *Giardia lamblia* and viruses only)

What other compliance options are available besides surface water treatment?

If the water system does not want to install or upgrade their existing treatment system they have several other options available depending on the situation. For wells that are constructed into a confined aquifer and have been determined to be potentially under the influence of surface water as a result of well construction deficiencies (identified in a Well Evaluation, Source Water Assessment, and/or Sanitary Survey), the water system may choose to reconstruct the source. If the water system chooses this option they will need to do so according to Drinking Water Services construction standards (see OAR 333-061-0050). Water systems can also choose to develop an alternate source of water by abandoning the surface water influenced well and constructing a new well away (>500 feet) from the surface water source or into a confined aquifer.

Finally, if another water system that has been approved by the State of Oregon is in close proximity, the water system may connect to that system and disconnect their surface water influenced well.

How are new wells screened by Drinking Water Services for the potential to be under the influence of surface water?

New water systems or existing water systems that plan on installing a new well are required to go through the plan review process. Plan review requirements are listed on Drinking Water Services web page (see Plan Review link at the end of this document). Groundwater systems will need to submit a Well Site Plan (see Part 2 of the Plan Review Requirements) to the Regional Plan Review Engineer. The information listed in the application will be used to determine if a water system needs to be evaluated for GWUDI.

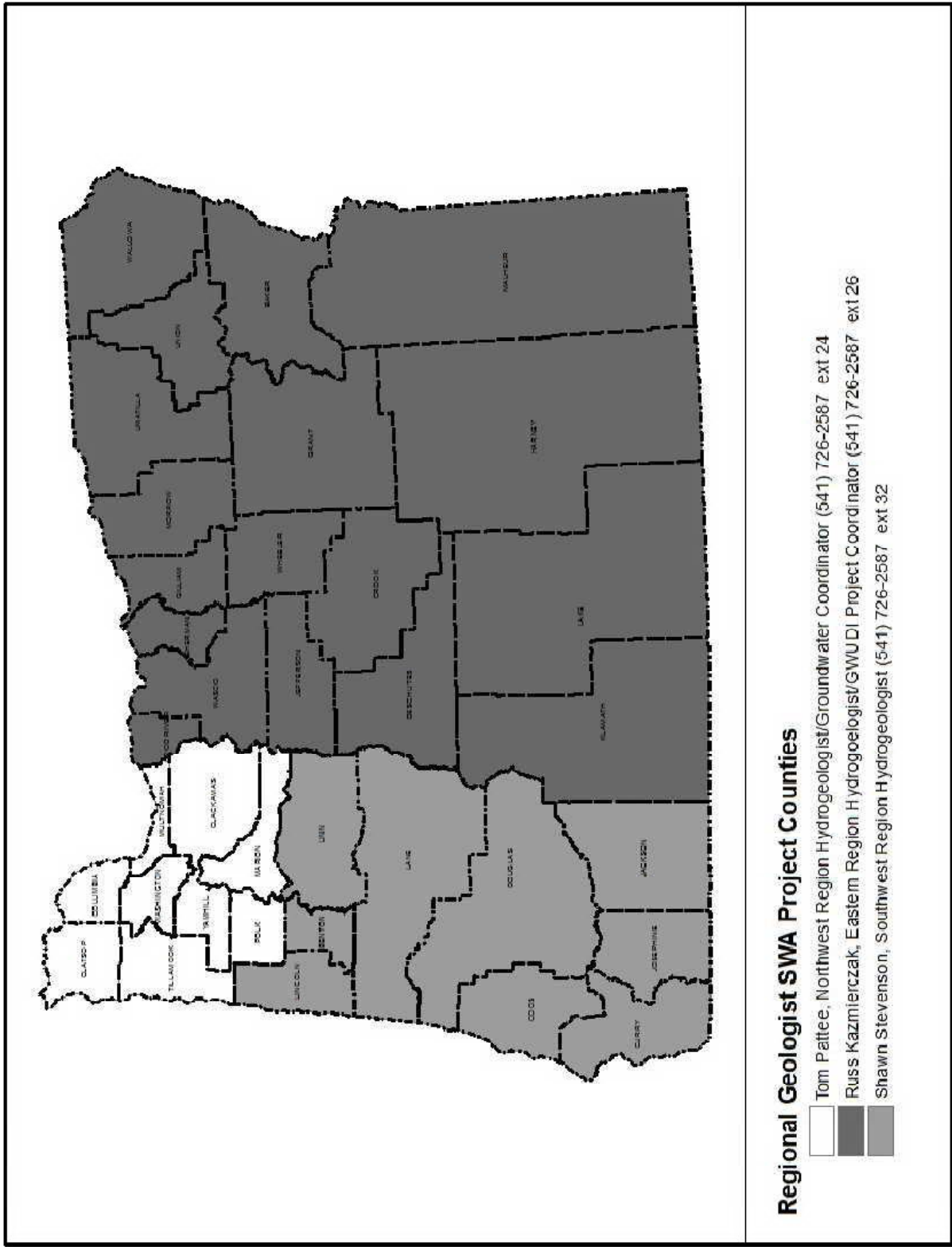
After the Plan Review Engineer has processed the application, a *Well Evaluation Request* form will be sent to the Regional Hydrogeologist for evaluation. The form will indicate if a surface water source is located within 500 feet of the well.

If the well construction review process determines that the well has a potential to be GWUDI, then the water system will be required to evaluate their source water as discussed previously in this document.

How does a person determine if a water system has already been evaluated for GWUDI?

To determine if a system has been evaluated for GWUDI, check the Data Online website for the water system and the source in question (see Data Online link at the end of this document). Use the WS Name Lookup or the WS ID Look Up options at the top of any Data Online page to find the water system under investigation. Once the water system has been selected, click on the [Groundwater/GWUDI Source Details](#) link located toward the bottom of the page. The link will contain information on the water source type (GW-Groundwater, GU-Groundwater Under Direct Influence or SW-Surface Water). In addition to the source type, the link also contains information about the source (i.e., Sensitivity Analysis Data) and monitoring history (i.e., Monthly Assessment Monitoring Data).

If the information listed in the [Groundwater/GWUDI Source Details](#) section appears incomplete, incorrect, or the date listed for Data Last Updated is prior to 2010, please contact the Regional Hydrogeologist for your area (see map on the following page).



Supporting Links for the Determination of GWUDI

Oregon Administrative Rules for Public Water Systems

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/Rules/Documents/pwsrules.pdf>

Groundwater Under the Direct Influence of Surface Water Resource Page

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Pages/gwudi.aspx>

Determination of GWUDI Flow Chart

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Documents/gwudi/GWUDIFlowChart.pdf>

GWUDI Fact Sheet for Water Systems

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Documents/gwudi/GWUDIFlyer.pdf>

Microscopic Particulate Analysis (MPA) Fact Sheet

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Documents/gwudi/MPAFactSheet.pdf>

List of Laboratories that Perform MPA Analysis

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Documents/gwudi/MPALabList.pdf>

EPA Consensus Method for Determining GWUDI Utilizing MPA

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Documents/gwudi/GWUDIMPAMethodology.pdf>

Laboratory Reporting Forms

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/Monitoring/Pages/labs.aspx>

Plan Review

- <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/PlanReview/Pages/index.aspx>

Data Online

- <https://yourwater.oregon.gov/>

Laboratories that Provide Microscopic Particulate Analyses

Last Updated January 2013

Important Information: Please Read Carefully!!!

Microscopic Particulate Analysis (MPA) is time sensitive so it is very important to contact and coordinate with the laboratory that will be providing the sampling equipment and analysis well in advance of the planned MPA sample event. In order to assist and insure that the samples are collected during the high risk periods of time specified by the State of Oregon, provide a copy of the enclosed MPA Sampling Requirement letter to the laboratory of your choice (see below for a list of laboratories).

In addition to the importance of collecting the sample during the specified high risk period, it is necessary for the water system to consider the timing of the sample collection event, especially the starting and ending times. Once the sample collection has been completed, maximum shipping and holding time for the sample must not exceed 48 hours. In other words, the laboratory must start the analysis within 48 hrs after sample collection has been completed. Failure to start the analysis within 48 hrs will result in invalidation of the sample and a requirement to repeat the sample event. Additional information regarding the sampling equipment, sample collection and laboratory analysis procedures can be found by clicking on the EPA Consensus Method for Determining GWUDI Using MPA link at <http://public.health.oregon.gov/HealthyEnvironments/DrinkingWater/SourceWater/Pages/gwudi.aspx>.

Laboratory Information

Below and on the following page is a list of laboratories that provide MPA services. The approximate equipment rental and analytical cost ranges from \$250-400 per sample event (shipping not included).

Laboratory: **Analytical Laboratories, Inc.**

Contact: Lynn Murray
Address: 1804 N 33rd Street
City: Boise State: ID Zip: 83703
Phone: 208-342-5515
Fax: 208-342-5591

Laboratory: **Biovir Laboratories**

Contact: Dorian Cielo
Address: 685 Stone Road Unit 6
City: Benicia State: CA Zip: 94510
Phone: 800-442-7342 or 707-747-5906
Fax: 707-747-1751
e-mail: dmc@biovir.com

**Laboratories that Provide Microscopic Particulate Analyses
January 2013**

Laboratory: CH Diagnostic & Consulting Service, Inc.

Contact: Brec Clay
Address: 512 5th Street
City: Berthound State: CO Zip: 80537
Phone: 970-532-2078
Fax: 970-532-3558

Laboratory: Energy Laboratories

Contact: Randy Ogden
Address: 2393 Salt Creek Highway
City: Casper State: Wyoming Zip: 82602
Phone: 888-235-0515
Fax: 307-234-1639

Laboratory: Grants Pass Water Laboratory

Contact: Dori Schaafsma
Address: 964 SE "M" Street
City: Grants Pass State: OR Zip: 97526
Phone: 541-476-0733
Fax: 541-476-8132
e-mail: doree@gpwaterlab.com

Laboratory: Lab/Cor, Inc.

Contact: Derk Wipprecht
Address: 7619 6th Avenue NW
City: Seattle State: WA Zip: 98117
Phone: 206-781-0155
Fax: 206-789-8424
e-mail: dwipprecht@labcor.net

Laboratory: Microsearch Laboratory, Inc.

Contact: Carrie Howe-Carlson
Address: 2783 Webster Road
City: Grand Junction State: CO Zip: 81503
Phone: 970-241-1446 Fax: 970-241-6092
e-mails: microlabs@aol.com