



Oregon

John A. Kitzhaber, MD, Governor

Department of Agriculture

635 Capitol St NE
Salem, OR 97301-2532



November 26, 2014

Mr. Kevin Cameron
Glenwood Store
57975 NW Wilson River Highway
Gales Creek, OR, 97117

RE: Notice of Non-Compliance and Corrective Action Required to Address Source Water Fecal Contamination at the Glenwood Store public water system PWS OR4191611

Mr. Cameron:

Our records indicate that you are the owner of Glenwood Store at 57975 NW Wilson River Hwy. in Gales Creek, Oregon. You are therefore 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 Glenwood Store water system is a transient non-community public water system serving between 10 and 100 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 Glenwood Store 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.

- Violation No. 1: OAR 333-061-0032(6) requires that water systems using groundwater sources take corrective action when sample results confirm the presence of *E. coli* bacteria in a groundwater source. Samples collected at the source for the Glenwood Store water system were analyzed and *E. coli* were found to be present in October 2014:

You were required to complete corrective action or to comply with a corrective action plan after being notified of the presence of *E. coli* in the source water at the Glenwood Store water system in October 2014. You did not complete corrective action and are not in compliance with a corrective action plan, which constitutes a violation of OAR 333-061-0032(6).

- Violation No. 2: OAR 333-061-0050(2)(a) and (b) require, in part, that groundwater springs be constructed with impervious durable material, include an intercepting ditch to effectively exclude surface water and be fenced to effectively prevent access by animals and unauthorized persons. An inspection of the spring on October 28th, 2014, however has found that its construction does not effectively prevent surface water and that it is not fenced to prevent access, which constitutes a violation of OAR 333-061-0050(2)(a) and (b).

ACTIONS REQUIRED TO ACHIEVE COMPLIANCE

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

- Compliance Action No. 1: You must submit an action plan, including complete construction plans if applicable, clearly identifying how you will take corrective action to address the fecal contamination associated with the spring at the Glenwood Store water system and ensure that the water system is free of public health hazards. The action plan must also identify how the groundwater spring will be made to meet all applicable construction standards specified in OAR 333-061-0050(2)(a) and (b) or how an alternate water source will be provided to replace the existing spring source for the Glenwood Store water system, as outlined in Compliance Action No. 2:
 - The action plan must be submitted to DWS **no later than December 31, 2014.**
 - Any construction plans submitted to DWS must meet all the applicable requirements of OAR 333-061-0060 and have sufficient detail to completely and clearly illustrate what will be constructed.

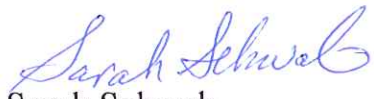
- Furthermore, DWS has reviewed the spring construction and the hydrogeology of the area and determined that the water bearing zone of the spring consists of an unconfined aquifer that is highly sensitive to nearby sources of contamination. Reconstruction of the existing spring so that it meets current construction standards may not prevent the need for water treatment to ensure adequate water quality.
- Compliance Action No. 2: You must complete corrective action or be following an approved schedule according to the plan submitted as specified in Compliance Action No. 1, no later than **March 3, 2015**, as required by OAR 333-061-0032(6) in order to address the fecal contamination at your spring. Corrective action alternatives for compliance include the following:
 1. Reconstruct the existing springbox, such that it meets all applicable construction standards in OAR 333-061-0050(2). Reconstruction of the springbox should include, but is not limited to: (1) removal of any cracked concrete pipe and (2) construction of a concrete, cement, or bentonite casing seal that has a minimum 4-inch thickness around the outside edge of the concrete pipe. The casing seal should extend to within 3 ft of the bottom of the springbox; or
 2. Provide an alternate source of water: Either construct a new source or connect to a different public water system that meets all drinking water standards.
- All physical or infrastructure changes at the Glenwood Store water system must meet the applicable construction standards specified in OAR 333-061-0050 and be approved by DWS prior to construction. Contact DWS, Plan Review at (971) 673-0408 to begin the process.
- Compliance Action No. 3: You must demonstrate to DWS, **no later than December 31, 2014**, that disinfection treatment at the Glenwood Store water system is constructed according to all applicable construction standards in OAR 333-061-0050.
 - You must also maintain a minimum chlorine residual of 1.0 milligrams per liter (mg/L) as documented in the attached calculations throughout the water system after treatment at all times.

- You must measure and record the chlorine residual daily and report the results to DWS monthly until final corrective action outlined above is completed. Reporting must be completed by the 10th of the following month according to OAR 333-061-0040(1) on the attached monitoring form using one of the following methods:
 - Email: dwp.dmce@state.or.us
 - Fax: (971) 673-0694
 - Mail: Drinking Water Services, P.O. Box 14350, Portland, OR 97293-0350

- Note that this is an interim measure. Disinfection treatment may be removed after the completion of corrective action and verification that fecal contamination is not present in the water source for the Glenwood Store water system.

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 either myself at (503) 508-6028, or Kent Widdicombe at (503) 681-9756, to discuss the compliance actions specified in this letter.

Respectfully,



Sarah Schwab,
Oregon Dept. of Agriculture

Enclosures:
Disinfection Calculations
Monthly Chlorine Residual Monitoring Form

cc: Kent Widdicombe, Oregon Dept. of Agriculture
James Nusrala, Oregon Health Authority, Drinking Water Services
Brad Daniels, Oregon Health Authority, Drinking Water Services