

July 27, 2012

Thomas W. and Roberta J. Lawre  
Sawyer's Landing RV Park  
6008 NE 78<sup>th</sup> St.  
Vancouver, WA 98665

RE: Notice of possible civil penalties related to the Sawyer's Landing RV Park water system, PWS ID# OR4192061

On July 24, 2012, inspectors for the Oregon Health Authority, Public Health Division, Center for Health Protection, Drinking Water Program (Program) observed that water which had not been filtered to remove surface water contaminants was purposefully being delivered to customers at the Sawyer's Landing RV Park (Sawyer's Landing) water system. This is a violation of OAR 333-061-0025 and OAR 333-0032(1)(b)(B) as specified below:

- OAR 333-061-0025 states, in part, that water suppliers are responsible for ensuring "that water system facilities are free of public health hazards." Inadequately treated surface water constitutes a public health hazard, and knowingly delivering such water to customers constitutes a violation of this rule; and
- OAR 333-0032(1)(b)(B) requires that public water systems using a surface water source meet filtration requirements if they do not meet the criteria for avoiding filtration. The Sawyer's Landing water system has not met the requirements for avoiding filtration and therefore must meet the filtration requirements specified. Knowingly delivering water to customers, even on a temporary basis, that has not been adequately filtered constitutes a violation of this rule.

Other violations include:

- OAR 333-061-0025(7) which requires water suppliers to "maintain a pressure of at least 20 pounds per square inch (psi) at all service connections at all times." Dion Blake, the onsite operator at the Sawyer's Landing water system, stated to the inspectors that water pressure dropped to zero (0) psi at service connections within the

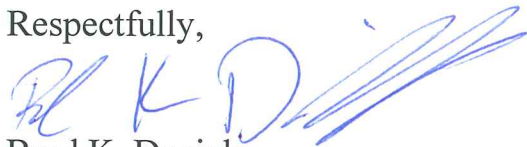
water system, which constitutes a violation of this rule;

- OAR 333-0032(1) requires, in part, that public water systems supplied by a surface water source operate water treatment processes which reliably achieve at least 99.9 percent removal and/or inactivation of *Giardia lamblia* cysts and 99.99 percent removal and/or inactivation of viruses. The water treatment process operated at the Sawyer's Landing water system does not currently meet these requirements, which constitutes a violation of this rule; and
- OAR 333-061-0050(4)(c)(D) requires water systems with surface water sources that have installed filtration to achieve a minimum of 0.5-log reduction of *Giardia lamblia* and 1.0-log reduction of viruses from disinfection after filtration treatment. The disinfection treatment process operated at the Sawyer's Landing water system does not currently achieve the minimum reduction of *Giardia lamblia* or viruses required by OAR 333-061-0050(4)(c)(D), which constitutes a violation of the rule.

Due to the violations identified above, you are at risk of being assessed civil penalties in the amount of \$50 for every distinct rule violation and for every day the Sawyer's Landing water system water system is in violation of a rule (OAR 333-061-0090).

This letter serves as official notification, pursuant to Oregon Revised Statute 448.280, that the Program may impose a civil penalty related to these violations. In the event that the Program imposes a civil penalty upon you, you will be notified in writing and provided an opportunity for a hearing pursuant to the Oregon Administrative Procedures Act (ORS chapter 183).

Respectfully,



Brad K. Daniels  
Enforcement Coordinator  
OHA - Drinking Water Program

cc: Dion Blake, Sawyers landing RV Park  
Amy Chapman, Lincoln County Environmental Health  
Daniel Hough, OHA DWP  
Fred Kalish, OHA DWP