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1/10/10

CROSS CONNECTION CONTROL ENABLING AUTHORITY
For the

Fernridge Mobile Estates
PWS 4100421

Section 1: Cross Connection Control--General Policy.

1.1 Purpose of the Enabling Authority:

The purpose of this enabling authority is to protect the public water supply of the Fernridge Mobile Estates from the possibility of contamination or pollution from any cross connection and to assure that approved backflow prevention assemblies are tested when put into service, repaired or relocated, and at least on an annual basis thereafter. This enabling authority is required by Oregon Administrative Rule (OAR) 333-061-0070 and 333-061-0071 for public water systems and the Uniform Plumbing Code (UPC), also known as the Plumbing Specialty Code, as adopted by the State of Oregon.

1.2 Responsibility: Water Purveyor (Fernridge Mobile Estates):

1.2.1 Fernridge Mobile Estates shall be responsible for the protection of the water distribution system from the foreseeable conditions leading to the possible contamination or pollution of the drinking water system due to the backflow of contaminants or pollutants into the drinking water supply.

1.2.2 Drinking water system surveys/inspections of the water distribution, when necessary, system shall be conducted by individuals deemed qualified by and representing Fernridge Mobile Estates. Survey/inspection records shall indicate compliance with OAR 333-061-0070 and 333-061-0071 and the UPC adopted by the State of Oregon.

1.2.3 The selection of the appropriate approved backflow prevention assembly for containment control at the required service shall be determined from the results of the system survey/inspection.

1.3 Responsibility: Consumer (Park resident, user, renter)

1.3.1 To comply with this enabling authority as a term and condition of water supply and acceptance of his/her responsibilities as a water system user.

- 1.3.2 It shall be the responsibility of the consumer to purchase, install and arrange testing and maintenance of any backflow prevention device/ assembly required to comply with this enabling authority. Failure to comply with this enabling authority shall constitute grounds for discontinuance of water service.
- 1.3.3 It shall be the responsibility of the owner of the backflow prevention device to provide the results of the annual test report to the manager of Fernridge Mobile Estates for its Annual Summary Report for the DHS Drinking Water Program.

Section 2: Definitions

- 2.1 Approved Backflow Prevention Assembly: means a Reduced Pressure Principle Backflow Prevention Assembly, Reduced Pressure Principle-Detector Backflow Assembly, Double Check Valve Backflow Prevention Assembly, Double Check-Detector Backflow Prevention Assembly, Pressure Vacuum Breaker Backsiphonage Prevention Assembly or Spill-Resistance Pressure Vacuum Breaker Backsiphonage Prevention Assembly, of a make, model, orientation and size approved by the Department. Assemblies listed in the currently approved backflow prevention assemblies list developed by the University of Southern California, Foundation for Cross-Connection Control and hydraulic research, or other testing laboratories using equivalent testing methods, are considered approved by the Department.
- 2.2 Backflow: means the flow of water or other liquids, mixtures, or substances into the distribution pipes of a potable supply of water from any sources other than its intended source, and is caused by backsiphonage or backpressure.
- 2.3 Backpressure: means an elevation of pressure downstream of the distribution system that could cause, or tend to cause, water to flow opposite of its intended direction.
- 2.4 Backsiphonage: means a drop in distribution system pressure below atmospheric pressure (partial vacuum), that would cause, or tend to cause, water to flow opposite of its intended direction.
- 2.5 Cross Connection: means any actual or potential unprotected connection or structural arrangement between the public or user's potable water system and any other source or system through which it is possible to introduce into any part of the potable system any used

water, industrial fluid, gas, or substances other than the intended potable water with which the system is supplied. Bypass arrangements, jumper connections, removable sections, swivel, or change-over devices, and other temporary or permanent devices through which, or because of which, backflow can occur are considered to be cross connections.

- 2.6 Department: means the Oregon Department of Human Services (DHS).
- 2.7 Premise Isolation: means the practice of protecting the public water supply from contamination or pollution by installing backflow prevention assemblies at, or near, the point of delivery where the water supply enters the premise. Premise isolation does not guarantee protection to persons on the premise.

Section 3: Requirements

3.1 Policy:

- 3.1.1 No water service connection to any premise shall be installed or maintained by Fernridge Mobile Estates unless the water supply is protected as required by OAR 333-061-0070 and 333-061-0071, the Plumbing Specialty Code of Oregon and this enabling authority. Water service to a customer found to be in violation of this enabling authority shall be discontinued by Fernridge Mobile Estates after due process of written notification and an appropriate time allowance for voluntary compliance, if the customer fails to:
- a) Remove or eliminate an existing unprotected or potential cross connection;
 - b) Install a required approved backflow prevention assembly;
 - c) Maintain an approved backflow prevention assembly;
 - d) Conduct the required testing of an approved backflow prevention assembly.
- 3.1.2 Each park resident shall allow access for inspections during reasonable hours to authorized representative(s) of Fernridge Mobile Estates for the purpose of conducting a hazard assessment survey to determine whether cross connections, actual or potential, exist. Water service may be refused or terminated, or maximum backflow protection may be required, to the premises where access is denied.

3.1.3 In the event of an actual backflow incident which endangers public health, water service may be terminated immediately and not restored until the cross connection is either eliminated or adequately protected.

3.2 Violation of this enabling authority

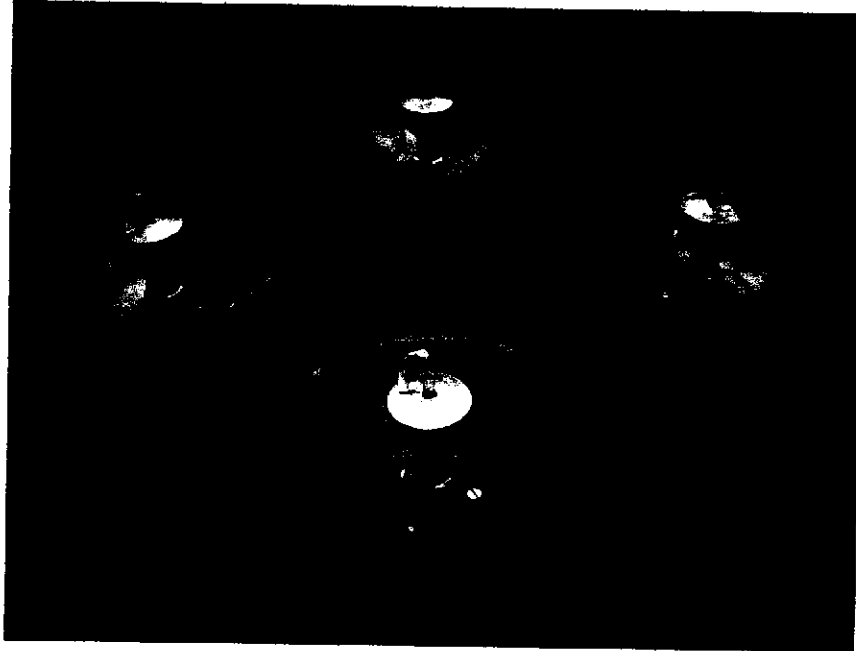
If violations of this enabling authority exist or if there has not been any corrective action taken by the customer within 14 days of the written notification of the deficiencies noted, then Fernridge Mobile Estates shall deny or immediately discontinue water service to the premises by providing a physical break in the service line until the customer has corrected the condition(s) to be in conformance with applicable OAR and Plumbing Specialty Code regulations and statutes relating to plumbing, safe drinking water and this enabling authority.

This enabling authority is approved and adopted on this date 12-30-09, by


Brad Downey, owner

and will remain in full force and in effect as of this date and shall remain in effect until such time as amended or eliminated.

Small System Vulnerability Assessment & Emergency Response Plan



For systems with up to 150 connections

State of Oregon
Department of Human Services
Drinking Water Program

June, 2009

EMERGENCY RESPONSE PLAN

For small public water systems serving 150 connections or less

All public water systems in Oregon are required to develop a written emergency response plan which incorporates the results of a security vulnerability assessment (OAR 333-061-0064). The Drinking Water Program has developed this handout for smaller systems to assist operators in meeting the requirement. This document includes:

- 1) An introduction to emergency response planning
- 2) Three tasks to complete a vulnerability assessment and develop a workable emergency response plan
- 3) A certificate of completion to be mailed to the Drinking Water Program
- 4) Appendices of various emergency response related templates for your use

Why should a public water system have an Emergency Response Plan?

In addition to the regulatory requirements, there are a number of reasons including the following:

- The plan prepares the water system for all kinds of emergencies – natural disasters, man-made events, and terrorist activities.
- The plan gives specific instructions about who to call if there is an emergency situation that may affect the water system.
- The plan helps develop procedures for responding to events that could affect your drinking water, such as a contaminated water source or storage tank.
- The plan addresses security measures for the water system.
- The plan organizes a number of important management and operations procedures into one document.

How is an emergency response plan incorporated into water system operations?

The emergency response plan should be an integral part of the water system routine operations. For example, a daily inspection of the system could be done along with other tasks. When the operator checks the stock of regular supplies they should inventory the emergency supplies and equipment as well. Also, ongoing training of water system staff should include the actions outlined in the emergency response plan.

Keep the emergency response plan active. Update the plan at least annually (especially contact information) and replace outdated copies of the plan immediately. Keep copies of the plan where they will be accessible to all staff, at all times. For example, some systems keep contact numbers, a map showing key components, and emergency procedures posted in the locked pump house. Consider writing the emergency response plan on a computer – then it can be easily updated and the current version shared with staff.

The information and procedures in this model plan are important and should be included in your water system's emergency response plan. If you currently have an emergency response plan that lacks any of the elements included in this packet, please amend the plan to include them. Feel free to organize the plan to best suit your needs.

Task 1: Complete a Security Vulnerability Assessment

Water systems must be prepared for the threat of deliberate acts of destruction, including terrorist activities meant to contaminate the water supply or destroy the water system itself. To begin, each water system must conduct a security vulnerability assessment as part of their emergency response plan to determine if there are areas needing improved security measures. The vulnerability assessment will address the following points:

- Characterize the water system, including its mission and objectives

- Identify adverse consequences to avoid
- Determine which critical assets might be subject to malevolent acts
- Assess the likelihood of such malevolent acts
- Evaluate existing countermeasures and what risks remain
- Develop a prioritized plan for risk reduction

Complete the questionnaire on pages 7 and 8 of this document for your vulnerability assessment, and modify as necessary to meet your needs.

Correct all security deficiencies identified in your security vulnerability assessment as soon as possible. You may have to prioritize this work, investing in the most obvious and cost-effective security improvements immediately and budgeting to complete others as you are able.

Task 2: Develop a Written Security Program

This document should provide a complete description of your security program, including such details as procedures for routine checks of the water system infrastructure and information about alarm systems. The written security program should be available only to those who need this information to ensure the security of the system. The following are basic components of a security program. Some of the components are one-time tasks and some should be written as security program procedures.

1. Security management:

- Assign security responsibilities to qualified individuals.
- Encourage staff to be alert to any signs of suspicious activity.
- Immediately investigate all information about suspicious activity and alert local law enforcement when appropriate.
- Conduct a daily check of the water system for signs of tampering or other unusual activity.
- Ask the local police/sheriff to include your facility in their routine patrols.
- Involve everyone in routine surveillance. Ask all water system users to watch for suspicious or unusual activity around water system facilities and provide them with phone numbers to report their observations.

2. Physical activity:

- Establish procedures for restricting entry to authorized personnel, contractors, vendors, and visitors only.
- Restrict access to critical areas of the water system; accompany visitors as needed.

3. Physical security:

- Protect wells, intake structures, reservoirs, etc., with fencing.

- Secure doors, windows, hatches, etc. using locks, seals, alarms, motion sensors, and other appropriate means (remember to consult federal, state, and local fire and occupational safety codes before making any changes).
- Account for all keys to all areas of the system.
- Use video surveillance where appropriate.
- Provide adequate interior and exterior security lighting.

4. Storage and use of chemicals:

- Secure chemical storage areas and limit access to authorized personnel.
- Keep track of hazardous chemicals and understand their associated risks.
- Use only properly labeled chemicals.
- Inspect incoming chemicals for signs of tampering or counterfeiting.

5. Personnel:

- Screen prospective employees or volunteers (references, background checks, etc.).
- Monitor employee activity through daily work assignments.
- Restrict personal items allowed in water system facilities.
- Collect identification keys and other security items when employees terminate.

6. Evaluation:

- Evaluate the lessons learned from past tampering or security threatening events.
- Annually review and test the effectiveness of the security program by:
 - Doing an annual water system security assessment (see appendix).
 - Using mock tampering events, challenging computer system security, etc.
 - Using a third-party expert to periodically evaluate your security program, revising the program as needed.

Task 3: Complete the Small System Security Vulnerability Assessment Questionnaire

List the Critical Components of your system. *For example, wells, pressure and storage tanks, pumps, etc.*

There are 3 wells on the property. Well #1 is the main well and is located in the well house by the storage tank. Wells #2 & 3 are back up wells. Inside the well house the water comes together and is treated to chlorine and soda ash before going into the storage tank. After it goes into tank; it is distributed through the system by a booster pump.

Is your system vulnerable in any way? *For example, lack of locks, open access to critical components, etc.*

The wells have small locks that could be taken off in order to get to them, as well as the well house. These are no more than padlocks there are a couple pipes just outside the well house and storage tank that are exposed to potential danger

What steps have you taken to protect your system? *For example, locks, fencing, alarms, cameras, routine patrols by law enforcement, etc.*

We check the chlorine and Ph daily, so there is a routine patrol. The well house will be rebuilt this summer 2010. At that time we will encompass those outer pipes mentioned. We have locks on the well heads and well house and storage tank

What additional steps could you take to further protect your system? *For example, additional or improved fencing, better locks, additional lighting, etc.*

Better lighting will be a part of the new well shed.
Better locks on the well heads
Enclosed pipes
New storage tank

How would you know if your system had been compromised? For example, broken doors, locks, or windows, cut fencing, etc.

They would have to break into a structure that is monitored daily

What actions would you take if you thought the system had been compromised? For example, halt normal operations, turn off water supply, conduct water tests, close the business, notify law enforcement, bring in bottled water for drinking and cooking purposes, etc.

Depends on the break in. We can do a number of things quickly. Bring online the back up wells (2 & 3), shut off water supply to residents, take tests immediately, disburse notice to residents to boil if necessary, bring in water truck (temporary) for residents (DARRELL BOOTS)

Additional Information:

Task 4: Chain of Command & Emergency Contacts

Water System Chain of Command:

<u>Staff Name and Position</u>	<u>Emergency Phone</u>
1. <u>Tim McFadden - General Manager</u> ^{DRC}	<u>503-789-2369</u>
2. <u>Don Shipley - on site manager</u>	<u>541-543-3902</u>
3. <u>Jim Madden</u>	<u>541-688-3799</u>
4. <u>Kelly Thomas</u>	<u>541-337-1268</u>
5. _____	_____

Operators and staff members will need to contact each other quickly in an emergency. Therefore, key personnel should have access to critical phone numbers both on and off duty. Keep these numbers up to date.

Where will the Emergency Response Plan be stored? At park office; At GM

Have all the people listed above been informed of the location(s)? Yes No
except Jim

Would they all have access to the stored plan in an emergency? Yes No
except Jim

In an emergency the following actions can be taken independently by any staff member:

1. Halt normal operations - (how?) Shut down system by closing ball valve ^{inside well shed} ~~outside tank~~ before after storage tank
2. before booster pressure pump/motor (3" valve)
3. Call Don Shipley to inform residents ^{by Kelly Thomas}
4. Call Willamette Valley Pump or Christensen Bros for pump repair if needed

The following actions require approval by a supervisor:

1. Resume normal operations (with approval of the Drinking Water Program)
2. Boil or shock (with chlorine) if necessary
3. turn valves back on
4. inform residents

EMERGENCY CONTACTS

(Review/update annually)

Name of Your Public Water System: <i>Fern Ridge Mobile Estates</i> PWS ID #: 41-00421			
WHO	ADDRESS, CITY	PHONE	FAX
OR Drinking Water Program	Portland	(971) 673-0405	(971) 673-0457
County Health Dept	<i>Eugene</i>	<i>541-682-4035</i>	
After hours, call the OR Emergency Response System (OERS)		(800) 452-0311	
Your Water Lab	<i>Delta Environmental</i>	<i>541-689-3177</i>	
Fire Department	<i>Junction City</i>	<i>541-998-3503</i>	
Law Enforcement	<i>LANE County</i>	<i>541-682-4150</i>	
County Emergency Management Agency	<i>911</i>		
Equipment Supply	<i>Willamette Valley Pump</i>	<i>541-726-4800</i>	
Engineering Company	<i>—</i>		
Utilities – Electrical	<i>Ericsson Electric</i>	<i>541 998-5848</i>	
Local Media	<i>POST IN PARK</i>		
Alternate Water Supplier(s)	<i>Darrell Boots</i>		
Pump Maintenance / Repair	<i>Willamette Valley Pump</i> <i>Christensen Bros</i>	<i>541-726-4800</i> <i>541-344-4205</i>	

TO REPORT A DRINKING WATER SYSTEM EMERGENCY

Please be prepared provide the following when contacting the OR Drinking Water Program, OERS, and/or your County Health Department

1. YOUR NAME, ADDRESS, PHONE NUMBER, CURRENT LOCATION
2. TYPE OF INCIDENT
3. EXACT LOCATION OF INCIDENT
4. THE DATE AND TIME THE INCIDENT OCCURRED
5. NATURE OF THREAT TO THE WATER SYSTEM