



PUBLIC HEALTH DIVISION  
Drinking Water Services

Tina Kotek, Governor

Oregon  
**Health**  
Authority

800 NE Oregon Street, #640  
Portland, OR 97232-2162  
Phone: 971-201-9794  
Fax: 971-673-0694  
[www.healthoregon.org/dwp](http://www.healthoregon.org/dwp)

February 29, 2024

Jeffrey Fuchs, Principal Engineer  
Consor North America, Inc.  
Via email: [Jeff.Fuchs@consoreng.com](mailto:Jeff.Fuchs@consoreng.com)

**Re: Groundwater Development Project (PR#2-2024)  
Rockwood PUD (PWS ID#00668)  
City of Gresham (PWS ID#00357)  
Conditional Approval**

Dear Jeffrey:

Thank you for your submittal to the Oregon Health Authority's Drinking Water Services (DWS) of plan review information for the Groundwater Development Project for Rockwood PUD and City of Gresham. On January 8, 2024, our office received plans, specifications, land use compatibility statement, pipe rig study report and a plan review fee of \$4,125.

The project includes installation of:

- A 24 MGD pump station with five 400-HP pumps,
- A filtration plant for secondary treatment of iron and manganese using Prylox Advantage filter media with a plant capacity of 21,000 gpm, and
- On-site chlorine generation equipment to be used as both an aid to the filtration process and for residual maintenance in the distribution system.

The project also includes distribution piping and improvements to Well #3 and Well #4. The distribution portion of the project will fall under the systems' plan review exemptions for water main extensions. The improvements to the wells are considered minor and do not require review by our office.

All items in contact with potable water appear to meet NSF 60 and 61.

**The plans are approved with the following conditions:**

- The pump station must be located above the maximum anticipated 100-year (1 percent) flood level.
- A sample tap prior to and after the secondary treatment is required.
- A sample tap prior to injection of chlorination is required. Existing raw water sample taps may be acceptable.
- Chlorinator piping must be designed to prevent the contamination of the potable water system by backflow of untreated water or water having excessive concentrations of chlorine.

**Until we receive verification that the conditions have been met and final approval has been issued, the facility is not approved for use.** Upon completion of the project, the engineer must verify in writing that construction was completed according to the submitted plans. If substantial changes are made, a set of as-built drawings must be submitted. Documentation demonstrating how the above conditions were met should reference Plan Review #2-2024 and can be emailed to me at [Carrie.L.Gentry@oha.oregon.gov](mailto:Carrie.L.Gentry@oha.oregon.gov).

In addition to the above conditions, I have the following comments:

- Note that increased lead and copper sampling will be required once final approval is issued. The water systems will be required to conduct two 6-month rounds at the original number of sample sites (60 in each system), with the new treatment in use.
- DWS has no current information on EPA's likelihood of manganese becoming a regulated contaminant. Monitoring during UCMR4 provided national occurrence data with 2.1% of PWS with results above 0.3 mg/L. When EPA does their next regulatory determination (probably 2026) then there should be a better idea of when or if EPA decides to regulate it. The proposed treatment target of 0.02 mg/L seems appropriate as far as potential future regulation and aesthetic goals.
- The bypass around the secondary treatment system is acceptable at this time. If EPA regulates manganese, there is a potential for DWS to determine that a bypass is not acceptable.
- Based on the proposed treatment, Rockwood PUD would be required to have an operator certified to a WT1.
- A waiver was submitted for new sanitary sewer service laterals that cross new or existing water mains. For new sanitary sewer service laterals over existing water mains, DEQ would be the one to issue the waiver. For new waterlines being installed at the same time as new sanitary sewer service laterals, OAR 333-061-0050(9)(c) applies. If the water system is not able to meet the rule, then a waiver may be appropriate.
- The water systems should include the new distribution piping under their annual reports

of waterline work to DWS, for the year that the pipeline projects are completed.

If you have any questions, please feel free to call me at (971) 201-9794.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Gentry', written in a cursive style.

Carrie Gentry, PE  
Regional Engineer  
Drinking Water Services

cc: Jeremy Hudson, PE, Rockwood PUD  
Jason Branstetter, PE, City of Gresham