

Application for Waiver from Construction Standards for Public Water Systems

Water System Name Umpqua Ranch COOP

PWS ID 4100714

Project or Facility Distribution System Improvements

County Douglas

Need for waiver identified: ☒ Water System Survey

Date of Survey 7/24/2024

☐ Plan Review #

Construction standard requested to be waived: OAR 333-061-0050 (2), (8)

As provided under OAR 333-061-0055, the Department may grant waivers from the construction standards prescribed by these rules:

- (a) When it is demonstrated to the satisfaction of the Department that strict compliance with the rule would be highly burdensome or impractical due to special conditions or causes; and
- (b) When the public or private interest in the granting of the waiver is found by the Department to clearly outweigh the interest of the application of uniform rules; and
- (c) When alternate measures are provided which, in the opinion of the Department, will provide adequate protection to the health and safety of the public including the ability to produce water which does not exceed the maximum contaminant levels listed in rule 333-061-0030.

Describe situation that conflicts with the standard.

1.) Active groundwater wells do not meet setbacks from sanitary hazards, see OAR 333-061-0050(2): Based on submitted water distribution and sewer collection asbuilt drawings and site verification, recently constructed sewer lines have been placed to close (under 50 feet) to existing active groundwater wells (Well #1, #3 and #6) and pose a sanitary hazard to the active groundwater wells per the above cited rule. Well setbacks are not compliant with Drinking Water Construction Standards as they are within 50 feet of a Sewer line, and The water lines are not spaced

2.) Major modifications not approved (plan review), see OAR 333-061-0050 and OAR 333-061-0060: Based on submitted as-built survey documents and site verification during the survey, the water system has made major modifications to its water distribution system (replaced distribution system). Wells #6 and #7 are currently listed as unapproved groundwater sources and need to go through the plan review process with DWS.

Describe why meeting the standard is highly burdensome or impractical.

1.)The work for this project was done using county approved Plumbing Codes rather than a plan review due to the entire distribution system being on one property. We believe this satisfies the noted deficiency that major modifications were not approved. This is evidenced by the paper trail of the abandoned plan review based on previous communications between the State and Engineering firm conducting the work. The plan review was determined to be abandoned because the project fell under county plumbing code.

2.) Although there was always a setback issue between the wells and the wastewater system, the new project did not correct this issue For Well 1, Well 3, or Well 6. This was because the available pathways did not permit correcting the setback requirement without eliminating housing.

Describe proposed alternate measure that provide adequate protection to public health and safety.

- 1.) The county plumbing code and inspections were used and approved for this project.
- 2.) All wells currently are disinfected and treated to LT2 Standards. They go through sand filters, membrane filters, and LT2 Cartridge Filtration. Although there is currently a bypass, this is scheduled to be removed by January 1st, 2025. We are requesting that this additional treatment offset not being able to comply with offset requirements in OAR 333-061-0050(2).
- 3.) Well 7 is not in use and will be scheduled for proper abandonment by May 2025.
- 4.) Well 6 was inspected in 2022. The liner was replaced, and a well log was created. The concrete slab was removed and it was verified that a concrete well seal was used during original construction. Flow testing and water quality testing indicate the well is capable of meeting the demand of the park during normal use most times of the year. The water is treated to LT2 standards as well. We are attaching photo's and correspondence of the work performed to date on well 6 that hope will allow approval for full use with the requirement that it always be treated through the Lt2 filtration.


Signature

11-22-24
Date

Name Jonathan Woody
Address 3641 Glenbrook Loop Rd
City/State/Zip Riddle, OR 97469
Telephone Number 541-643-6137

Attach plans of proposed waiver request or additional supporting information and

- Email your regulator; or
- Email dws.planreview@dhsosha.state.or.us; or
- Mail:

Oregon Health Authority
Drinking Water Services #640
PO Box 14450
Portland, OR 97293-0450

☐ Comments:

☒ Attachments: I.E. Letter, county permit, plumbing inspection report, well 6 well log, well 6 pictures of well seal, invoice from well driller for new liner and inspection for well 6, letter regarding well 6.

OHA Use Only

Waiver ID

Entered into waiver database ☐

☐ Plan Review Coordinator's notes:

After due consideration the above requested waiver from the construction standards of OAR 333-061-0050 is hereby:

☒ Approved

☐ Denied

Comments: Approved as long as all the well water goes through the surface water treatment plant prior to first user. The bypass around the water treatment plant needs to be physically removed with a spool of pipe removed.

Casey Lyon

Drinking Water Regional Manager Signature
Oregon Health Authority

11.25.24

Date

Waiver database updated ☐