



# Oregon

Theodore R. Kulongoski, Governor

**Department of Human Services**

**Public Health Division**

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BEFORE THE STATE OF OREGON  
DEPARTMENT OF HUMAN SERVICES  
OFFICE OF ENVIRONMENTAL PUBLIC HEALTH

In the Matter of the

Glenn Doetsch,

Certified Operator

Final Order Revoking  
Operator Certification

To: Glenn Doetsch  
PO Box 326  
Coos Bay, OR 97420

On March 18, 2010, The Department of Human Services, Office of Environmental Public Health, Drinking Water Program (DWP), issued a Notice of Proposed Revocation of Operator Certification and Opportunity for a Hearing to Glenn Doetsch. The Notice offered Mr. Doetsch an opportunity for hearing, if requested within 21 days of service of the Notice. The Notice designated the relevant portions of the Department's file on this matter, including all materials submitted by Mr. Doetsch, as the record for purposes of default. Mr. Doetsch did not request a hearing within the 21 days of service.

Pursuant to OAR 333-061-0270, this revocation is based upon the following:

1. Mountain Terrace Mobile Home Park (Mt. Terrace) is a community water system with 23 service connections serving 45 people and is located in Coquille, Oregon. All of the following facts pertain to operations and water quality monitoring at Mt. Terrace.



2. Under OAR 333-061-0225(1), Mt. Terrace is required to "employ, contract with or otherwise utilize an operator designated to supervise the water system, to be in direct responsible charge of the water system, and to be available during those periods of time when treatment processes and operational decisions that affect public health are made."

3. Because it has less than 150 connections, Mt. Terrace is classified as a small water system and is required to have a certified operator at the small water system level or higher. Under OAR 333-061-0228, to become certified as a small water system operator, an individual must have a high school diploma or equivalent; complete a DWP approved training on small water system operation and water treatment processes, or pass a Department approved written examination covering basic small water system operation and water treatment. Certification must be renewed every three years and in order to be renewed an operator is required to complete 6 hours of Department approved continuing education.

4. An individual in direct responsible charge of a small water system is responsible for the day to day operation of the system which might include any of the following duties:

- Operation & Maintenance of pumps and motors
- Testing/sampling
- Leak detection/repairs
- Installation of taps/pipelines/service connections

5. Glenn Doetsch and Anna Doetsch, his wife, attended the DWP's small water system training course on June 22, 2004. Ms. Doetsch was listed as the operator in direct responsible charge and Mr. Doetsch was listed as a "backup" or assistant.

6. In June 2007, Mr. Doetsch went to the required training for renewal of his certification and at that point was listed as the operator in direct responsible charge of Mt. Terrace.

7. Community water systems, including those classified as small water systems for certification purposes, are required to sample monthly for total coliform bacteria according to OAR 333-061-0036(6)(b). If a sample result is positive for total coliform, a water system is required to collect four repeat samples according to OAR 333-061-0036(6)(c). In the month following a total coliform-positive sample, the system is required to collect at least five routine samples according to OAR 333-061-0036(6)(i). Coliforms are bacteria that are naturally present in the environment and are used as an indicator that other, potentially harmful, bacteria may be present.

8. Under OAR 333-061-0030(4), Mt. Terrace exceeds the maximum contaminant level (MCL) for coliform bacteria if two or more samples collected in a month are positive for total coliform. When a public water system exceeds the MCL for coliform bacteria, it may be required to take other actions to address the contamination and must issue a public notice to alert users of the system of the potential problem. Mt. Terrace has accrued three violations of the MCL for coliform bacteria since 2004, and the pattern of uncorrected and continuing violations of the MCL for total coliform demonstrates the inability of Glenn Doetsch, as the operator of the Mt. Terrace, to maintain minimum water quality standards in water served by the system. There may also have been additional violations of the MCL for coliform bacteria if the system had met its sampling requirements.

9. Since June 2004, when Glenn Doetsch became a certified operator at Mt. Terrace, the water system has accrued the following violations:

- Twelve violations of OAR 333-061-0036(6)(b) for failure to collect routine coliform samples, eight of which occurred after June 2007;
- Four violations of OAR 333-061-0036(6)(c) for failure to collect repeat coliform samples following a total coliform-positive sample result;
- Six violations of OAR 333-061-0036(6)(i) for failure to collect at least five routine coliform samples during the next month following a total coliform-positive sample result, two of which occurred after June 2007;
- Twelve violations of OAR 333-061-0040(1)(b) for failure to report coliform sample results within 10 days of the end of the monitoring period;
- Four violations of OAR 333-061-0036(4)(c) for failure to collect total trihalomethanes (TTHM) and haloacetic acids(five) (HAA5) samples, two of which occurred after June 2007;
- Three violations of OAR 333-061-0036(2)(e) for failure to collect nitrate samples, two of which occurred after June 2007;

- One violation of OAR 333-061-0036(2)(a), after June 2007, for failure to collect inorganic chemical samples;
- One violation of OAR 333-061-0036(3)(a), after June 2007, for failure to collect synthetic organic chemical samples;
- One violation of OAR 333-061-0036(3)(b), after June 2007, for failure to collect volatile organic chemical samples;

10. On December 3, 2004, a sanitary survey of the water system at Mt. Terrace was conducted and identified several significant deficiencies. A Significant Deficiency is defined in OAR 333-061-0020(162) as "a defect in design, operation, or maintenance, or a malfunction of the source(s), treatment, storage, or distribution system that has been determined to cause or have the potential for causing the introduction of contamination into the water delivered to consumers." Eight of these significant deficiencies were not corrected as required, and were again identified during the next sanitary survey conducted on April 29, 2008.

11. On February 1, 2010, the DWP received four coliform bacteria sample reports from Mt. Terrace. On February 3, 2010, it was determined that three of the recently submitted reporting forms were fraudulently submitted and had not been analyzed by the laboratory listed as having performed the analysis on the reporting forms.

Under OAR 333-061-0270(1)(b) the DWP may revoke the certification of an operator if the operator has been grossly negligent, incompetent or has demonstrated misconduct in the performance of the duties of an operator or supervisor of a water distribution system; or the operator has violated or failed to comply with any DWP rule or order.

While Mr. Doetsch has been certified and has been in direct responsible charge of the water system at Mt. Terrace, the DWP's rules regarding sampling and reporting have been violated numerous times, significant deficiencies have not been corrected, and false reports have been submitted to the DWP in an attempt to cover up the fact that sampling was not done in accordance with the DWP's rules.

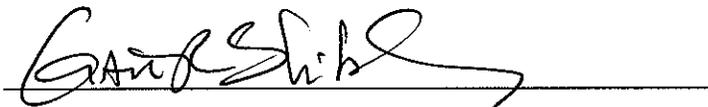
Given the current practices of the person in direct responsible charge of the drinking water system at Mountain Terrace Mobile Home Park there can be no assurance that safe drinking water is being delivered to the tenants of the mobile home park. Without proper monitoring and sampling there could be elevated levels of microbial contaminants in the drinking water that could result in serious health risks such as infectious disease.

Mr. Doetsch has demonstrated gross negligence in the supervision and operation of the water system at Mt. Terrace, and alternatively has demonstrated incompetence in the performance of his duties as the operator in direct responsible charge.

**ORDER**

Glenn Doetsch's small water system operator certification is **HEREBY REVOKED**.

Dated this 15<sup>th</sup> day of April 2010.



Gail R. Shibley, JD, Administrator  
Office of Environmental Public Health

cc: Rick Hallmark, Coos County Environmental Health  
David Kinyon, Mountain Terrace Mobile Home Park  
Jay MacPherson, DHS-DWP  
Shannon O'Fallon, Oregon Department of Justice  
Harold Rogers, USEPA

DATE of Service: April 15, 2010



Brad K Daniels

By certified mail and first-class mail

**Notice:** You are entitled to judicial review of this order in accordance with ORS 183.482. You may request judicial review by filing a petition with the Court of Appeals in Salem, Oregon within 60 days from the date of this order.

