TESTIMONY

184327 REGULAR AGENDA

CAMP DRESSER AND MC KEE CONTRACT - LT2 VARIANCE REQUEST

IF YOU WISH TO SPEAK TO CITY COUNCIL, PRINT YOUR NAME, ADDRESS, AND EMAIL.

AND LWAL.		
NAME (print)	ADDRESS AND ZIP CODE	Email
SCOTT FERNANDA	2 1821 N. E.65	gldrsHcleanithin
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Date 12-15-10

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December 15, 2010

Portland City Council Testimony-1637

EPA Variance Deficiencies and Alternate Solution

Scott Fernandez M.Sc. Biology / Microbiology

Almost a decade ago community stakeholders determined an EPA LT2 Variance was an inappropriate solution. Because of EPA LT2 policy inconsistencies and the EPA Variance's 3 year renewal process making it temporary, it was concluded a **Waiver exempting Portland from LT2 was the permanent solution of choice.**

We have spent 3 years wasting time and money meeting EPA's inconsistent expectations and we now are told that EPA's position is: "cannot see how we could recommend to the State that a Variance to the LT2 treatment technique requirements be granted to PWB."

One of the benefits of time is that we have seen firsthand Cryptosporidium is a red herring. Cryptosporidium is not a public health problem in municipally treated surface water utilities.

It's time to stop wasting time and money on a Variance for Portland. It's time for Portland City Council to obtain a Waiver from LT2 incorporating Congressional help in achieving such an outcome.

Reminder- EPA drinking water sampling $0 \neq 0$

Variance: State or US EPA permission not to meet a certain drinking water standard. The water system must prove that: (1) it cannot meet a Maximum Contaminant Level, even while using the best available treatment method, because of the characteristics of the raw water, and (2) the variance will not create an unreasonable risk to public health. The state or US EPA must review, and allow public comment on, a variance every three years. States can also grant variances to water systems that serve small populations and which prove that they are unable to afford the required treatment, an alternative water source, or otherwise comply with the standard.