

**Moore-Love, Karla**

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**From:** Dee White <deewhite1@mindspring.com>  
**Sent:** Wednesday, March 08, 2017 8:04 AM  
**To:** Moore-Love, Karla  
**Subject:** Testimony Agenda Item 215-235 Confluence Contract for corrosion control and treatment plant  
**Attachments:** Testimony Agenda item 215-235 from Dee White.pdf; 00657 Compliance and Enforcement Schedules \_ Data Online \_ Oregon Drinking Water Services.pdf; oha-letter-to-pwb-11-4-2016.pdf

Karla,

Please include these documents in the record for this agenda item. Please also send me a receipt that you have received.  
THANKS so much.

Dee White

March 7, 2017

**Testimony from Dee White regarding contract with Confluence Engineering Group LLC  
Agenda Item 235 for March 8, 2017 Portland City Council meeting**

Below is Portland Water Bureau testimony from Portland City Council PM meeting March 1, 2017  
Agenda Item 215

At ~33:53 minutes

<https://www.youtube.com/watch?v=8t5UkRT5kqA>

**Portland Water Bureau Deputy Director Gabriel Solmer:** "My name is Gabriel Solmer. I am the Deputy Director of the Water Bureau. And you've heard from Scott (Bradway). You've heard from Mike (Stuhr) about what we are here for today. I just wanted to remind us that ultimately the Bureau's recommendation today is to move forward with the treatment pilot. So we've tried to be really clear in our outreach; we've done a significant amount of outreach to sensitive users, to industrial users, to community and environmental groups to let them know what we are thinking of and to get their feedback. So our recommendation is to move forward with the contract with Confluence for the treatment pilot. And then ultimately what that would bring us to is a couple of things and I want to be really clear about this because although we have that contract before you today we want to let you know what's coming forward in the next few months. So if we move forward today with the treatment pilot that would be the first step in designing and constructing a corrosion control treatment facility that would actually implement that corrosion control. We are going to do the pilot, we are moving very step by step through this process. But we would be following the joint approved compliance schedule between the Water Bureau and OHA to improve our corrosion control treatment. And by way of overlapping some of these steps we were actually able to move this process along, so that's why you see if you move forward today with a design contract coming back in July, that might seem like a short amount of time because we won't be done with the treatment pilot at that point but we will know enough and this is where we assume we will be by July, we'll know enough about what chemicals we are looking at to know what that design will look like so we can get started with design and meet the schedule that we are on even though the treatment would continue on and would overlap with the design contract and then coming back in Fall of 2018 potentially into January of 2019 depending on the schedule with the actual construction contract. Most of these chemicals that Scott was talking about, they need the same footprint, they need the same injection type into the system so that the design of the actual facility is not going to change much depending which facility and which dosage you use. Of course, that is very important for us to get right but we can start with the design and even into the construction as we go through the pilot.

**Mayor Ted Wheeler:** Could I ask a question on the pilot. So how, you say you continue to work with community partners, I assume that this is an open research system, that you are collaborating, that you are showing people the data ..."

Mayor Wheeler and Commissioners Fish, Saltzman and Eudaly,

I would like to comment on a few statements made by Deputy Director Solmer at the City Council meeting March 1, 2017. The Water Bureau's compliance schedule was submitted to OHA and accepted. It was NOT imposed on the Water Bureau by the OHA or directed by the OHA; the Water Bureau imposed it on themselves and OHA approved.

***From November 4, 2016 OHA letter (which is attached):***

*"Thank you for your September 8 proposed schedule to enhance corrosion control treatment and further reduce lead levels at the tap. We have carefully considered your proposal, conferred with experts at EPA, and appreciate your clarifying of issues and questions during our evaluation process."*

*"We recognize the efforts the Bureau is making to evaluate the impact of corrosion treatment and plan for the construction of a new water treatment facility, which is necessary to make significant and systematic reductions of lead in Portland's drinking water. The Bureau took the first step in this process in Spring of 2014, when it initiated the water quality corrosion study which is currently underway, and which you have been updating OHA and EPA on its progress. OHA looks forward to reviewing this study when it is completed, no later than July 1, 2017."*

*We concur with the Bureau's corrosion control treatment improvement schedule as proposed. The action steps of the schedule are listed below with completion dates.*

*OHA considers the above a compliance schedule. Steps, due dates, and completion dates will be posted and tracked on the Drinking Water Services website. Any modification requires OHA approval in advance, should unforeseen technical or permitting delays occur."*

The posted schedule as of today is attached. I would also like to add that the Water Bureau had already made the decision to build a treatment facility as acknowledged by OHA above.

I also request to be added to the stakeholder list and be included on all outreach and meetings that the Water Bureau continues to do. Let me be clear: ALL PORTLAND WATER RATEPAYERS ARE STAKEHOLDERS. I request that I am added to this email list. Also please add the following to the email list:

Scott Fernandez [scottfernandez.pdx@gmail.com](mailto:scottfernandez.pdx@gmail.com)

Floy Jones [floy21@msn.com](mailto:floy21@msn.com)

Mark Bartlett [bartlett.m@comcast.net](mailto:bartlett.m@comcast.net)

Thank you,  
Dee White  
Portland OR 97206

188272



Oregon Public Health

## Drinking Water Data Online

[Introduction](#) :: [Data Search Options](#) :: [WS Name Look Up](#) :: [WS ID Look Up](#) :: [DWS Home](#) :: [Quick Data Links](#)PWS ID: 00657 --- PORTLAND WATER BUREAU

## Compliance and Enforcement Schedules

Schedule Type: All Groups

Schedule Status: Open Schedules

Type of Action	Date Issued	Due Date	Closed Date
Other Compliance Schedule	Jan 24, 2017		Open
Other Compliance Schedule	Nov 04, 2016		Open
Submit a plan to OHA for interim lead reduction		Dec 02, 2016	Dec 02, 2016
Complete Water Quality Corrosion Study		Jun 01, 2017	
Review study data and agree with OHA on treatment options; submit recommendation to City Council for consideration		Jun 30, 2017	
Submit Water Quality Corrosion Study final report to OHA		Jul 01, 2017	
Submit Corrosion Control Treatment Pilot Study Plan to OHA		Sep 30, 2017	
Implement recommendations to improve the lead hazard reduction program elements as identified by OHA		Dec 31, 2017	
Submit Corrosion Control Treatment Pilot Study results and treatment		Dec 31, 2018	
Begin Improved Corrosion Control Treatment Facility Design		Jan 01, 2019	
Submit Improved Corrosion Control Treatment Plans and Specifications to OHA		Sep 30, 2020	
Begin Corrosion Control Treatment Facility Construction		Jan 01, 2021	
Complete Improved Corrosion Control Treatment Facility		Sep 30, 2022	
Complete demonstration tap monitoring round		Nov 30, 2022	
Comply with Minimum Water Quality Parameters		Mar 01, 2023	

For all compliance errors please phone Brad Daniels, DWS Compliance Specialist, at 971-673-0405.



OREGON STATE PUBLIC HEALTH DIVISION  
Office of the State Public Health Director

Kate Brown, Governor



800 NE Oregon Street, Suite 930  
Portland, OR 97232  
Phone: 971-673-1229  
Fax: 971-673-1299

November 4, 2016

Mr. Michael Stuhr,  
P.E. Administrator  
Portland Water Bureau  
1120 S.W. 5th Ave., Room 600  
Portland OR 97214-1926

Dear Mr. Stuhr:

Thank you for your September 8 proposed schedule to enhance corrosion control treatment and further reduce lead levels at the tap. We have carefully considered your proposal, conferred with experts at EPA, and appreciate your clarifying of issues and questions during our evaluation process. We appreciate the steps the Bureau has taken to improve corrosion treatment. Portland needs to take additional immediate steps to reduce levels of lead in drinking water. Given the known elevated lead levels at some taps in the Portland water service area, we direct the Bureau to take the following interim actions to further protect public health as it implements the corrosion control treatment improvement schedules committed to and described in this communication:

1. **Increase corrosion treatment using current facilities:** We expect the Bureau to move quickly to further reduce lead levels at the tap as much as possible using the existing treatment and water system facilities. While we agree that Portland must upgrade its water treatment facilities and infrastructure to achieve significant reductions in lead levels, there are short-term steps Portland must take within its current system to treat water and reduce lead. We expect the Bureau to submit a plan to OHA for interim lead reduction by December 2, 2016. This interim plan should include immediate steps and intermediate steps to reduce lead in drinking water. We then expect the Bureau to fully implement an OHA-approved plan as quickly as possible and report on deadlines.
2. **Implement changes in Lead Hazard Reduction Program to protect vulnerable populations:** We expect the Bureau to aggressively conduct, assess, and improve the components of the Lead Hazard Reduction Program: 1) water treatment, 2) free lead in water education and testing, 3) public outreach and education, and 4) lead hazard reduction. The bureau must focus its efforts on vulnerable populations such as pregnant women and children under the age of six. We also expect the Bureau to aggressively and fully implement any recommendations identified by OHA Program Design and Evaluation Services in its evaluation of program elements by December 31, 2017. The Bureau must increase reporting to OHA on status, changes and improvements in the Lead Hazard Reduction Program to quarterly from semi-annually.

We recognize the efforts the Bureau is making to evaluate the impact of corrosion treatment and plan for the construction of a new water treatment facility, which is necessary to make significant and systematic reductions of lead in Portland's drinking water. The Bureau took the first step in this process in spring 2014, when it initiated the water quality corrosion study which is currently underway, and which you have been updating OHA and EPA on its progress. OHA looks forward to reviewing this study when it is completed, no later than July 1, 2017.

We concur with the Bureau's corrosion control treatment improvement schedule as proposed. The action steps of the schedule are listed below with completion dates.

Action Step	Completion Date
Complete Water Quality Corrosion Study	June 1, 2017
Review study data and agree with OHA on treatment options; submit recommendation to City Council for consideration	June 30, 2017
Submit Water Quality Corrosion Study final report to OHA	July 01, 2017
Submit Corrosion Control Treatment Pilot Study Plan to OHA	September 30, 2017
Submit Corrosion Control Treatment Pilot Study results and treatment	December 31, 2018
Begin Improved Corrosion Control Treatment Facility Design	January 01, 2019
Submit Improved Corrosion Control Treatment Plans and Specifications to OHA	September 30, 2020
Begin Corrosion Control Treatment Facility Construction	January 01, 2021
Complete Improved Corrosion Control Treatment Facility	September 30, 2022
Complete demonstration tap monitoring round	November 30, 2022
Comply with Minimum Water Quality Parameters	March 01, 2023

OHA considers the above a compliance schedule. Steps, due dates, and completion dates will be posted and tracked on the Drinking Water Services website. Any modification requires OHA approval in advance, should unforeseen technical or permitting delays occur.

If you have questions, please contact me.

Sincerely,



Lillian Shirley, BSN, MPH, MPA  
Public Health Director  
Oregon State Public Health Division

Cc: Lynne Saxton, Director, Oregon Health Authority  
Jere High, Administrator, Center for Prevention and Health Promotion

**Moore-Love, Karla**

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**From:** Dee White <deewhite1@mindspring.com>  
**Sent:** Wednesday, March 08, 2017 7:52 AM  
**To:** Moore-Love, Karla  
**Subject:** Testimony agenda item 235 FW: Questions re: Corrosion Study and Treatment Plant Agenda Item 235 March 8  
**Attachments:** Questions re Corrosion Study and Treatment Plant Agenda Item 235.docx

Karla,

Please include this email in the record for th agenda item 215/235. Please also send me a receipt that you have received. THANKS so much.

Dee White

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**From:** Dee White [mailto:deewhite1@mindspring.com]  
**Sent:** Sunday, March 05, 2017 9:19 PM  
**To:** Kristin Dennis (kristin.dennis@portlandoregon.gov)  
**Subject:** Questions re: Corrosion Study and Treatment Plant Agenda Item 235 March 8

Dear Kristin,

Thank you for reaching out to me after last week's afternoon Council session regarding the Corrosion Pilot-Study and Treatment Plant. You asked that I send questions I have for Mayor Wheeler that were not answered after my testimony.

Please communicate with Mayor Wheeler that I strongly urge him to review the following reports before voting on the contract with Confluence Engineering Group, LLC, which will be voted on this Wednesday, March 8 2017. Agenda Item 235

1. Economic analysis of building a new treatment plant
2. Site and/or siting report (exactly where is this plant going to be if contract states "at or adjacent to Lusted Hill"?)
3. Cost-benefit analysis
4. Alternatives report and analysis including:
  - a. Adding updated equipment to existing facility
  - b. Expanding or retrofitting existing facility
  - c. Doing nothing other than using existing facility or at the most substituting an appropriate chemical and delivery system that would provide a meaningful benefit to our water quality and public health.

Thanks again,  
 Dee White

3836 SE 49<sup>th</sup> Ave.  
 Portland OR 97206  
 503-775-2909

Dear Kristin,

Thank you for reaching out to me after last week's afternoon Council session regarding the Corrosion Pilot-Study and Treatment Plant. You asked that I send questions I have for Mayor Wheeler that were not answered after my testimony.

Please communicate with Mayor Wheeler that I strongly urge him to review the following reports before voting on the contract with Confluence Engineering Group, LLC, which will be voted on this Wednesday, March 8 2017.

1. Economic analysis of building a new treatment plant
2. Site and/or siting report (exactly where is this plant going to be if contract states "at or adjacent to Lusted Hill"?)
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4. Alternatives report and analysis including:
  - a. Adding updated equipment to existing facility
  - b. Expanding or retrofitting existing facility
  - c. Doing nothing other than using existing facility or at the most substituting an appropriate chemical and delivery system that would provide a meaningful benefit to our water quality and public health.

Thanks again,  
Dee White

3836 SE 49<sup>th</sup> Ave.  
Portland OR 97206  
503-775-2909



**Moore-Love, Karla**

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**From:** Dee White <deewhite1@mindspring.com>  
**Sent:** Tuesday, March 07, 2017 8:30 PM  
**To:** Moore-Love, Karla  
**Subject:** FW: Corrosion Control Pilot and Treatment facility Contract vote Wednesday March 8

Karla,

Please include this email document in the record for Agenda item 215/235 and forward to Council. Please also send me a receipt that you have received. THANKS so much.

Dee White

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**From:** Dee White [mailto:deewhite1@mindspring.com]  
**Sent:** Tuesday, March 07, 2017 2:07 PM  
**To:** 'MayorWheeler@portlandoregon.gov'; 'Dan.Saltzman@portlandoregon.gov'  
**Cc:** Kristin Dennis (kristin.dennis@portlandoregon.gov); 'Matt.Grumm@portlandoregon.gov'; Scott Fernandez  
**Subject:** Corrosion Control Pilot and Treatment facility Contract vote Wednesday March 8

Dear Mayor Wheeler and Commissioner Saltzman,

Please do not vote in favor of this contract tomorrow. Portland is under **order** from the OHA and the EPA to immediately reduce lead in our drinking water using current infrastructure. Which the Water Bureau is doing NOW.

The Water Bureau has informed some large water users that they will be raising the pH to 8.2 by Spring. Treatment options they are investigating include sodium bicarbonate (NaHCO<sub>3</sub>), carbon dioxide (CO<sub>2</sub>), sodium hydroxide (NaOH), sodium carbonate (Na<sub>2</sub>CO<sub>3</sub>), calcium hydroxide (Ca(OH)<sub>2</sub>), orthophosphate (phosphoric acid PO<sub>4</sub><sup>3-</sup>) and zinc orthophosphate (Zn<sub>3</sub>(PO<sub>4</sub>)<sub>2</sub>).

In a letter dated January 25, 2017, Jere High, Administrator, OHA Public Health Division states:

**"We approve raising the pH at the entry point to the distribution system (emphasis mine) from the current target of 8.0 to 8.2, as recommended by the Environmental Protection Agency. We understand the Portland Water Bureau will raise the pH to 8.1 within two weeks, and up to 8.2 after the spring 2017 lead and copper tap sample results are analyzed. OHA will establish minimum regulatory pH values based on lead levels found in the spring 2017 sampling. Future adjustments to the regulatory minimum may be necessary."**

Why the fast track on this pilot and facility? The urgency was dictated LAST YEAR to the Water Bureau by the EPA and OHA: Fix the water NOW. And, which the Water Bureau is attempting to do, although none of this was mentioned at the council meeting, in the community Impact Statement, the ordinance itself or in the contract. Also not mentioned is the need or justification for either a pilot or a new facility.

Please ask Commissioner Fish to consider another process/track here and not put the cart before the horse, which is clearly what this contract is doing. The City HAS to follow the directions of EPA and OHA as far as improving corrosion IMMEDIATELY.

Why not consider Scott Fernandez's recommendation to do a system-wide unidirectional flushing while lowering the pH and THEN decide next steps forward? Throwing more chemicals into a dirty and neglected distribution system does not reflect best practices nor does it benefit the public. We are ALL STAKEHOLDERS and we should be treated as such.

The EPA and OHA are NOT requiring the Water Bureau to start a pilot project and build a treatment plant. In fact, there is no need or justification at this time to do either the pilot or build a plant, given that they are currently changing the pH.

The Impact Statement says "The Project will require a treatment pilot be completed to evaluate treatment alternatives for improved corrosion control treatment to *further* reduce lead.....

The Water Bureau has their orders from the EPA AND OHA. They want lead reduced **following best practices using current existing infrastructure**. Put this contract on hold until ongoing chemical changes and reporting to the OHA and EPA are complete and approved. It seems that the OHA would be the ones who would recommend ANOTHER corrosion control project (since the Black and Veatch has ended) if they are not satisfied with the Water Bureau's results.

Thank you,  
Dee White

3836 SE 49<sup>th</sup> Ave.  
Portland OR 97206

**Moore-Love, Karla**

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**From:** Dee White <deewhite1@mindspring.com>  
**Sent:** Monday, March 06, 2017 4:02 PM  
**To:** Moore-Love, Karla  
**Subject:** Agenda item 215/235 for March 8 PWB contract with Confluence  
**Attachments:** Oregon Health Authority statement directing immediate action to improve corrosion treatment and reduce lead levels in the Portl.pdf

Karla,

Please include these documents in the record for this agenda item. Please also send me a receipt that you have received.  
THANKS so much.

Dee White

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**Tony Andersen** OHA External Relations 971-239-6483 PHD.Communications@state.or.us

11/9/2016

**Oregon Health Authority statement directing immediate action to improve corrosion treatment and reduce lead levels in the Portland area**

The Oregon Health Authority was notified by the Portland Water Bureau (PWB) confirming that lead levels in the Portland water service area had recently exceeded federal standards. As public health officials and the agency responsible for regulating lead levels in municipal drinking water systems, OHA directed the PWB to take immediate action to accelerate corrosion control strategies and improve lead levels throughout the water system.

As a result, [OHA called on the PWB](#) to further protect public health and accelerate the timeline for improving lead levels in Portland drinking water, as a follow-up to Portland’s corrosion control planning process currently underway. The accelerated timeline calls for immediate steps, including increased corrosion control using current facilities, and aggressively implementing changes in the Lead Hazard Reduction Program to further protect vulnerable populations.

OHA recognizes that Portland’s current strategy has had an impact by reducing lead exposure and raising awareness of lead hazards, despite facing challenging infrastructure issues. OHA will continue to work with Portland to evaluate short- and long-term plans for accelerating corrosion control and reducing lead levels at the tap. OHA appreciates the PWB’s prompt action and looks forward to continued improvement of Portland’s drinking water.

For more information:

- [November 4, 2016, letter from OHA to the Portland Water Bureau](#)
- [Lead paint and dust are the most common way people are exposed to lead](#)
- [Access the latest public information on statewide drinking water data](#)

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