

From: floy jones
To: [Merrell, Melissa](#)
Subject: LT2 documents/comments
Date: Friday, July 14, 2017 1:17:42 PM
Attachments: [epa_letter_retrospective_rev_regs_03182011\[1\].pdf](#)
[EPA Won't Force NYC To Build \\$1.6B Reservoir Cap - Law360.html](#)

Melissa,

Could you please send me a copy of any forwarding of the attached documents and below comments so I will know when both the PUB and the PWB are in receipt of this information.

Thank you.

Floy Jones

PUB members,

Given that public comments by those of us with extensive on- topic knowledge has been limited to 3 minutes and in that new information has come to light since your Tuesday meeting, I am submitting additional supportive documents and comments for our position, supplementing the documents submitted last week, this last Monday and last month.

Our position is that even if “money were no object” as Mike Stuhr stated we would not support the introduction of mercury with bulbs that tend to break, or worse yet chemicals via a filtration plant to our Bull Run water system and water for no measurable public health benefit. We’ve provided water bureau and American Water Works Association documents to show that there is no reason we would be doing such if not for the outdated, flawed EPA regulation. The PWB made no mention of a need to build a UV radiation facility or chemical-adding filtration projects at any time during the December to May budget season, no mention prior to securing a 6.7% water rate increase piled on top of a decade of base and water rate increases.

Sound science, including new scientific research, 125 years of disease-free history, community support for avoiding further changes to the taste and composition of our pure Bull Run water and avoiding further rate increases requires requesting a delay immediately.

We do not support the PUB giving weight to water bureau supplied anonymous “public” comments posted last check predominately on your website.

NYC found Crypto and secured deferral

1. NYC has found *Cryptosporidium* in the water they serve to customers yet has secured a 20 - year deferral until 2034 as reported to me by a NYC water department official and as noted in their water bond document. Over the years Friends of the Reservoirs has spoken with a NYC water department engineer and met their scientists in person at an EPA LT2 meeting in Washington D.C.. **NYC’s water system is unfiltered** . Their new UV facility is located before their Hillview open reservoir. They have detected *Cryptosporidium* in their open reservoir. The attached document *epa_letter_retrospective* on pages 9 and 10 mentions *Cryptosporidium* at their open Hillview reservoir. We are not submitting a very large and confidential document that FOR and the PWB possess that extensively details the Crypto detects in the Hillview reservoir, a open reservoir that delivers water direct to customers.
2. Also attached is a public notice that EPA won’t enforce the “treat or cover” LT2 Crypto, Giardia, virus requirement.

Again NYC's water bond document refers to the deferral.

July 12 WHOLESALE CUSTOMER MANAGER MEETING CONCERN

On Wednesday, **July 12, 2017** the day after the last PUB meeting, I and another Bull Run advocate attended a **wholesale customer water manager meeting** at the Rockwood public water district office.

Approximately 11 water districts were in attendance at this meeting. They asked Yone Akagi and Dave Peters if they had done an LT2 projects economic analysis, risk and probability study. They were not happy with the answer which was no, but that the PWB was doing an analysis of sorts now for PUB's meeting this next Tuesday. The response was with an analysis being **ruled it cannot be done that well and would be of little value**. Mark Knudson who was invited to speak at your last meeting was not in attendance at this meeting but there were two representatives from TVWD in attendance. Some of you may not know that Mark Knudson worked for the PWB for approx.. 20 + years, negotiated the last wholesale customer contract for Portland then left the PWB shortly after for TVWD. FOR and a former PURB member was invited by Commissioner Leonard to attend the last few meetings of this wholesale contract negotiation. Everything was essentially settled by the time we were involved.

CORROSION CONTROL- July 12 wholesale customer meeting

Wholesale customers were most concerned about their being excluded from the PWB corrosion control studies until after decisions are essentially made which they said "could throw the whole region into chaos". It was revealed that the PWB may be looking at building two corrosion control plants if they use ortho phosphate.

During my years on the PWB budget advisory committee and the approx.. eight years of continuous attendance at these meetings the water bureau repeatedly said there was no remaining lead in our water system. Systematic ongoing flushing of the water system to remove biofilm that might make current corrosion control chemicals more effective perhaps avoiding the need for adding any additional corrosion control treatment was not undertaken.

Rushing corrosion control decisions caused great consternation for large and small water districts each with different blends of water, different water sources. Another comment at the July 12 meeting was that the result of the PWB rushing decisions while wholesalers aren't involved at the outset could mean a big new issues for their customers.