



Randy Leonard, Commissioner
David G. Shaff, Administrator

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Marie Jennings
Drinking Water Unit Manager
U.S. EPA Region 10
1200 Sixth Avenue
Suite 900 OWW - 136
Seattle, Washington 98101-3140

Subject: Length of study design and inclusion of historical data as part of Long Term 2 Enhanced Surface Water Treatment Rule (LT2) Variance package

Dear Ms. Jennings:

The City of Portland Water Bureau is using this letter to notify the EPA of the key components of the forthcoming sampling design and proposal to demonstrate a raw water *Cryptosporidium* level of 3-log lower than the Bin 1 cutoff for filtered public water systems.

The City intends to intensively sample its raw water over the course of one year to demonstrate its raw water contains less than 0.000075 oocysts/liter. The City also intends to apply data gathered monthly since 12-17-2002 to 1-20-2009 to apply towards the variance. These samples have been collected and analyzed per LT2 requirements, including matrix spikes every 20 samples.

These two components are viewed as key elements in ensuring the monitoring activity is economically and technically feasible, and fall within the guidelines found within FR vol.71 No3, p. 729.

If you have any questions or concerns as to this approach, please let me know. We intend to submit a formal proposal incorporating these two elements within the next 30 days.

Thank you for your prompt attention to this matter.

Sincerely,

David Shaff
Administrator

Cc: Mike Finn, EPA Headquarters Office
Chris Wanner, Director of Operations, Portland Water Bureau
Yone Akagi, P.E., Regulatory Compliance Manage, Portland Water Bureau