

OREGON STATE PUBLIC HEALTH DIVISION

Office of the State Public Health Director

Kate Brown, Governor



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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