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**From:** Jennings, Marie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EC4BD403E1994B80976542BB9458AE72-JENNINGS, MARIE]  
**Sent:** 7/13/2018 7:07:42 PM  
**To:** Lorie McFarlane [Ex. 6 Personal Privacy (PP)]  
**CC:** Lee, Charles [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bb6f13c5a0ab453c8492636a72ffa3c2-Lee, Charles]; Tejada, Matthew [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=6559971c9dcd4c689ca6ec6b2a8cb0ee-Tejada, Matthew]; Beck, Nancy [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=168ecb5184ac44de95a913297f353745-Beck, Nancy]; Hughes, Hayley [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d98153a3667544ce81b60dd0b1ecbd0d-Hughes, Hay]  
**Subject:** RE: 2018 Water Quality Report - another ALE in Portland, Oregon  
**Attachments:** PWB Interim measures Response to OHA\_12.2.16.pdf

Hello Ms McFarlane

Sorry for delay in getting back to you. Please find attached PBW's interim plan to OHA that I hope addresses your questions. You may have already seen this document. EPA worked with OHA and PWB on the interim measures. Also, since last year, OHA has worked closely with EPA to review PWB's water quality data. Our efforts agreed that PWB's water quality parameters (WQP) ranges could be improved to more effectively control lead corrosion since the system continues to exceed the lead action level. On April 20, 2017, OHA established interim WQPs based on feasible levels given their interim measure of raising pH to 8.2 at the entry point. The entry point was reset from a pH of 7.2 to 8.0 and the distribution system from a pH of 7.0 to 7.6. We are continuing to review their data quarterly.

1. What **corrective actions** is OHA making, after the State approved an "alternative", less-stringent LCR in 1997, that is still not minimizing lead? See Attached Document
2. Is the Water Bureau required to do something in the interim to protect all citizens to the extent feasible ... **right now**? See Attached Document
3. PWB will *not be optimizing* corrosion control treatment until many years from now (by 2027). Yet the 2018 WQ Report asserts, "Water quality is a shared responsibility between the Portland Water Bureau and its customers". Where systems like Portland are *not yet optimized*, why is PWB and the Commissioner-in-charge stepping up their messaging to customers to replace their "bad" plumbing, while failing to mention that sub-optimally treated water has made - and will continue to make - lead corrosion problems worse? We are in discussions with OHA re: the CCR.

**From:** Lorie McFarlane [Ex. 6 Personal Privacy (PP)]  
**Sent:** Monday, June 11, 2018 4:32 PM  
**To:** Jennings, Marie <Jennings.Marie@epa.gov>; Jennings, Marie <Jennings.Marie@epa.gov>  
**Cc:** Lee, Charles <Lee.Charles@epa.gov>; Tejada, Matthew <Tejada.Matthew@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Hughes, Hayley <hughes.hayley@epa.gov>  
**Subject:** 2018 Water Quality Report - another ALE in Portland, Oregon

Marie Jennings,  
Drinking Water Manager  
EPA region 10

Dear Ms Jennings,

I am writing on behalf of public drinking water health protection during the next decade - especially for pregnant women, infants and young children, and immuno-compromised.

Portland Water Bureau Director Mike Stuhr and Water Commissioner Nick Fish have just approved their *Annual 2018 Drinking Water Quality Report*. I have looked at some other cities' WQR/CCR's who have made efforts to fully inform and educate the public on lead, and the intention of the Lead and Copper Rule. Portland has not, in spite of our Utility's chronic high lead levels and most 2 back-to-back exceedances. Here is one excerpt:

*"The Portland Water Bureau has been reducing lead in water by treating Bull Run water with sodium hydroxide for corrosion control since 1997. However, new evidence shows that there is no safe level of lead exposure. This led the Portland Water Bureau to install enhanced corrosion control by 2022. This will increase the alkalinity and pH of the drinking water to further reduce the amount of lead at customer taps. "*

After historic and the 2 recent lead exceedances, it is disingenuous to perpetuate this false assurance (1st sentence), misinform the public on what is a long-held understanding of lead's health impact (2nd sentence). It is particularly egregious to suggest that this "new" knowledge was what drove PWB's decision to "enhance" CCT, as a courtesy to the public (3rd sentence). Finally, there is no explanation on whether or when corrosion control will be *optimized*, per the precise intent of the LCR(4th sentence).

Here is another excerpt:

***"Arsenic, Barium, Copper, Fluoride and Lead:***

*These metals are elements found in the earth's crust. They can dissolve into water that is in contact with natural deposits. At the levels found in Portland's drinking water, they are unlikely to contribute to adverse health effects. "*

"Lead is regulated at customer taps" has been completely deleted from the 2018 Report ( previously in this section of earlier WQR's).

Other messaging has simply changed; "Improved CCT" is now characterized as "enhanced CCT", likely because "improved CCT" in Mar/Jn 2017 did not improve lead levels for the Oct 2017 sampling (in fact caused another ALE).

Portland's website byline claims, "From forest to faucet, we deliver the best drinking water in the world". But Numbers don't lie.

The 90th%ile in the Report shows PWB still struggling with minimizing lead due to inadequate corrosion control. The City of Tualatin, a PWB wholesale customer, reported a lead ALE last week, the City of Gresham - in Jan 2018. Moreover, PWB's public education has been poor and ineffective, except to fault customer plumbing: "Does your plumbing contribute lead to your drinking water?" [in water bill inserts].

These are only a few things to note from the Report.

Ms Jennings, I am requesting you address these 3 questions specifically:

1. What **corrective actions** is OHA making, after the State approved an "alternative", less-stringent LCR in 1997, that is still not minimizing lead?
2. Is the Water Bureau required to do something in the interim to protect all citizens to the extent feasible ... **right now**?
3. PWB will *not be optimizing* corrosion control treatment until many years from now (by 2027). Yet the 2018 WQ Report asserts, "Water quality is a shared responsibility between the Portland Water Bureau and its

customers". Where systems like Portland are *not yet optimized*, why is PWB and the Commissioner-in-charge stepping up their messaging to customers to replace their "bad" plumbing, while failing to mention that sub-optimally treated water has made - and will continue to make - lead corrosion problems worse?

Thank you for your thoughts, attention, and time.

Sincerely,

Lorie McFarlane,

**Ex. 6**