

PORTLAND: An Introduction to LT2

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The Long Term 2 Enhanced Surface Water Treatment Rule (LT2) was proposed by the federal Environmental Protection Agency (EPA) in 2003 and finalized in 2006 as part of the agency's ongoing implementation of the federal Safe Drinking Water Act.

According to the EPA, "The purpose of the LT2 rule is to reduce illness linked with the contaminant *Cryptosporidium* and other disease-causing microorganisms in drinking water." *Cryptosporidium* is a micro-organism (protozoan) naturally present in bodies of surface water throughout the world. LT2 applies to all public water systems in the United States that use surface water (rivers or lakes) as the source of their drinking water. Nationwide, the rule affects about 14,000 water systems, serving approximately 180 million people.

Portland's primary source of drinking water- the Bull Run watershed – is subject to the rule as a surface water source. The rule does not apply to Portland's groundwater source in the Columbia River South Shore.

The LT2 rule requires that unfiltered surface water systems, such as Portland's, provide additional treatment to specifically address *Cryptosporidium*. The *Cryptosporidium* protozoa is resistant to chlorine disinfection, the treatment process Portland currently uses.

In response to the treatment requirements of the LT2 rule, the Portland Water Bureau has since 2008 pursued parallel compliance efforts: seeking a treatment variance and designing a UV treatment facility. With [the announcement](#) by the Oregon Health Authority Drinking Water Program (OHA) that it has granted Portland's treatment variance request, the UV treatment facility design has been halted. Because Portland is operating under a variance, it does not treat for *Cryptosporidium*. Portland plans to achieve ongoing compliance with the treatment requirements of the LT2 rule by meeting a set of monitoring and reporting requirements established by OHA as conditions to the variance. The deadline for beginning the variance monitoring program is April 1, 2012.

The 2006 rule also requires the City to end the use of its uncovered finished drinking water reservoirs at Mt. Tabor and Washington Parks. The options for achieving compliance with the uncovered reservoir requirements of the rule are to cover the reservoirs, build treatment facilities to treat the water leaving the reservoirs, or to build sufficient enclosed storage elsewhere in the system in order to discontinue the use of the uncovered reservoirs for drinking water storage.

In response to the uncovered reservoir requirements of the LT2 rule, the Portland Water Bureau is constructing additional storage capacity, allowing the uncovered reservoirs to be taken off-line.

The current deadline for compliance with the uncovered reservoir portion of the rule is December 31, 2015 for the Mt. Tabor Reservoirs and December 31, 2020 for the Washington Park Reservoirs. To better manage the relevant capital construction projects and to defer a portion of the rate impacts associated with them, Portland has submitted a request to OHA for a compliance deadline extension. If approved, this would move the deadline for compliance to 2024 for Mt. Tabor and 2026 for Washington Park. OHA has not yet responded to Portland's request.