

Oregon DEQ Toxic Water Quality Standards Revisions
EQC Public Hearing - February 16th, 2011
Testimony: Steve Fancher, PE

1. Introduction

Good afternoon, my name is Steve Fancher, Public Works Director for the City of Gresham. The City of Gresham is the fourth largest city in Oregon and provides wastewater services to a population of 115,000; including the cities of Fairview and Wood Village. Gresham is also a Phase I NPDES stormwater permit holder.

2. Commitment To Toxic Reduction

- a. Gresham strongly supports efforts to reduce toxics from all sources to Oregon's water resources, and to protect the health of all segments of the population.
 - i. Our **Wastewater Program** exceeds the requirements of the federal Clean Water Act;
 - Our pretreatment program staff continually work with our industrial customers, such as Boeing, Boyd's Coffee, ON Semiconductor, and others to ensure they meet and exceed the pretreatment requirements of the Clean Water Act.
 - We operate our wastewater treatment plant very effectively. The National Association of Clean Water Agencies (NACWA) has awarded our plant for operating for seven consecutive years without a permit violation.
 - We have worked with our community in sponsoring drug take back events to help reduce the disposal of pharmaceutical drugs to the sewer system.
 - We have partnered with area dentists to reduce mercury-containing wastes into sewer.
 - We plan to have our treatment plant powered completely by renewable power sources in five years (currently at 80% - co-generator, solar, PGE clean wind power purchase), and;
 - Over the last 10 years, our community has invested \$29 million in treatment plant and collection system improvements to prevent sanitary sewer overflows to local streams.
 - ii. Our **Watershed Program** is also proactive and considered a leader by industry standards;
 - We have a solid rate structure in place to ensure a steady source of funding for stormwater management and stream restoration programs.
 - We are one of the leaders in developing and implementing Low-Impact Development practices to manage stormwater from new development and to retrofit into the existing City streets and other impervious surfaces. We have committed millions of dollars over the past 5 years toward Green Streets, retrofitting a good portion of arterial and collector streets with rain gardens, porous pavements, trees, and sidewalks and bicycle lanes to promote clean transportation options.
 - We are spending millions of dollars over the next 5 years to upgrade the City's drywells to better protect groundwater resources and meet Safe Drinking Water Act requirements.

- We implement public information and involvement campaigns to reduce the use and discharge of toxic pollutants

I provide you with this information to help make the point that we could spend more money on these and other programs to try to meet the proposed toxics standards, but doing so would be wasteful. There is generally a knee in the curve of the graph illustrating incremental water quality improvement versus cost (cost-benefit ratio), and in this case we are off the chart. We are so far off the chart that we do not even know of technologies that will achieve the desired results, regardless of cost.

From a responsible government perspective, it only makes sense to go after the sources of these toxic substances, as once they are in the storm or wastewater stream they are either impossible or ridiculously expensive to remove. Without a state-wide effort to eliminate these sources, you are passing the buck to entities that cannot effectively regulate the sale and use of specific materials, and will need to spend orders of magnitude more tax and rate-payer money to chase pollutants without confidence of success.

An effective water quality toxic reduction program must be a broad initiative, and all sources must be addressed. It cannot be successful by focusing on water quality permit holders alone.

Thank you.