

Chair Helm, Vice-Chairs Owens and Hartman, and members of the House Committee on Agriculture, Land Use, Natural Resources and Water:

I am writing to provide some follow-up and additional context with regards to HB 3207 testimony and discussion at last evenings public hearing.

Specifically, concerning the proposed data transmittal process from accredited labs to DEQ, I want to emphasize that the agency would seek to work collaboratively with the private accredited labs to develop a Chain of Custody form and electronic reporting template that minimizes burden and eliminates unnecessarily duplicative data entry effort required by the labs. It is the agency's intent and expectation that the reporting template, once developed with coordinated input from labs, can be used to meet data handling and reporting needs to both the clients and to the state, such that additional/duplicative data entry would not be required. This will be achieved by developing the template as a basic excel file type (.xls or .csv) that is compatible with most standard data management systems and that may efficiently be exported to a client reporting document (e.g., a pdf or word doc) and as an attachment for transmittal to DEQ via email. It is also worth noting that the -2 amendment was crafted specifically to provide labs with flexibility to use the DEQ-developed Chain of Custody form, if they choose, but that they may opt to use their own (provided that it includes equivalent information) if it would be more efficient for their data/sample processing systems.

I also want to take the opportunity to point out a distinction between the domestic well sample results collected as part of real-estate transaction requirements compared to drinking water testing results that are collected from public drinking water systems. The domestic well sample results are intended to be 'raw water' samples collected from the well, prior to applying any treatment, whereas testing of public water systems is primarily looking at treated samples to ensure that post-treatment water supplies are meeting drinking water standards. Although these data sets could theoretically be combined, the former is more akin to other water quality data results that DEQ assembles in its publicly available [Ambient Water Quality Monitoring System \(AWQMS\) database](#), whereas the latter is specific to entities regulated under the Safe Drinking Water Act. The domestic well testing results serve two purposes: i) to inform potentially property buyers of the natural conditions of their domestic well so that they may consider the need/importance of investing in and maintaining treatment solutions, and ii) to assess the groundwater quality conditions, generally. These are among the multiple reasons why DEQ and OHA support the changes proposed under HB 3207-2.

Thank you for your time and consideration of this bill and please let me know if you have additional questions or concerns.

Best regards,

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