Submitter:	Matt McGrath
On Behalf Of:	
Committee:	House Committee On Climate, Energy, and Environment
Measure, Appointment or Topic:	HB3814
Re: Support for HB 3814	

Bacteria present in seafood processing wastewater does not come from human sewage.

Restrooms in seafood processing plants are not connected to stormwater or processing lines but rather to local sanitary sewers. HB 3814 is now needed to differentiate between human and non-human fecal sources and to clarify that seafood processing plants are not human fecal sources and therefore wastewater discharges from seafood processing plants are eligible for bacteria mixing zones. By not differentiating between human and non-human fecal sources of bacteria, the rule implies a false equivalency of risk between bacteria originating from human and non-human sources.

Without a mixing zone and the availability of treatment technology to meet human fecal source standards, the seafood processing industry will not be able to meet permit requirements and will be forced to discontinue processing operations in Oregon. Because we know there is no human sewage in the wastewater, the potential risk for exposure to human pathogens is much lower than for wastewater from a sewage treatment plant. The prohibition of mixing zones for a sewage treatment plant, therefore, should not apply to a seafood processing plant.

I fully support HB 3814 which will allow allocation of mixing zones for bacteria in seafood processing effluent.

Respectfully submitted,

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