



PROGRESS MICHIGAN

POWERING PROGRESS TOGETHER

Hugh Madden
215 S. Washington Square, Suite 100
Lansing, MI 48933

September 30, 2015

FOIA Coordinator
Department of Environmental Quality
P.O. Box 30457
Lansing, MI 48909-7957

Via email: deqfoia@michigan.gov

Pursuant to Michigan Freedom of Information Act § 15.231 et seq., on behalf of Progress Michigan, I am requesting electronic copies of all emails from January 1, 2013 through the present date, sent to or received between the Michigan Department of Environmental Quality and the Office of the Governor regarding water service for the City of Flint. This request includes emails sent or received by Emergency Managers as well as all city officials and employees. This request also includes emails sent or received using the private email accounts of any of the requested individuals or organizations.

Please include any attachments that were a part of these emails such as word documents, or PDFs or other types of documents. Please also include copies of emails in which any of the above were simply "cc-ed" or "bcc-ed".

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$50.00. However, I would also like to request a waiver of all fees in that the disclosure of the requested information is in the public interest and the request is limited in scope.

If you deny any or this entire request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

When responding to this request, please do so in an electronic format, via email, at hugh@progressmichigan.org.

Sincerely,

Hugh Madden, Progress Michigan

(517) 999-3646

6877-15
EXEC - RMD
Lansing
Due: 10-22-15

10 DAY EXT.
ISSUED

FEE WAIVER DENIED
RW



** ADDITIONAL INFO***Woosley, Rosemary (DEQ)**

From: Hugh Madden <hugh@progressmichigan.org>
Sent: Monday, October 26, 2015 4:16 PM
To: DEQFOIA
Subject: Clarification of FOIA Request

To clarify/amend my FOIA request dated September 30, 2015:

I am looking for emails pertaining to violations of the Safe Drinking Water Act by the City of Flint from the beginning of the switch from the Detroit Water system to the Flint River as the main source of drinking water. In addition, I am seeking emails regarding the need for adequate corrosion control within the Flint water system.

This request includes all communications with Emergency Managers, Flint officials, the office of the Governor, the Department of Treasury and any other emails that pertain to the requested information.

--

Hugh Madden
Communications Director
Progress Michigan

Tommasulo, Karen (DEQ)

From: Tommasulo, Karen (DEQ)
Sent: Monday, January 26, 2015 2:47 PM
To: Busch, Stephen (DEQ)
Subject: RE: interview for article on Flint drinking water

Thanks!

From: Busch, Stephen (DEQ)
Sent: Monday, January 26, 2015 1:59 PM
To: Tommasulo, Karen (DEQ)
Subject: Re: interview for article on Flint drinking water

No that was it. I called her back to direct her to the governor office but responded to all questions by email.

She will let me know if she has any follow up

Stephen Busch, P.E.
 Lansing and Jackson District Supervisor
 Office of Drinking Water and Municipal Assistance
 MDEQ
 517-643-2314

Sent from my iPhone

On Jan 26, 2015, at 1:51 PM, Tommasulo, Karen (DEQ) <TommasuloK@michigan.gov> wrote:

Have you had other contact with Chastity? Answered questions over the phone or talked with her at the public meeting or anything?

From: Busch, Stephen (DEQ)
Sent: Monday, January 26, 2015 1:09 PM
To: Wurfel, Brad (DEQ); Shekter Smith, Liane (DEQ); Benzie, Richard (DEQ); Prysby, Mike (DEQ); Datema, Maggie (DEQ); Tommasulo, Karen (DEQ)
Subject: FW: interview for article on Flint drinking water

FYI. Bridge Magazine request for information. See below. Note Letter to Governor office deferred to Governor's Office at this time.

Stephen Busch, P.E.
 Lansing and Jackson District Supervisor
 Office of Drinking Water and Municipal Assistance
 MDEQ
 517-643-2314

From: Busch, Stephen (DEQ)
Sent: Monday, January 26, 2015 1:07 PM
To: 'Chastity Pratt'
Subject: RE: interview for article on Flint drinking water

Ms. Pratt Please see responses to your questions below.

Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ ,
517-643-2314

From: Chastity Pratt [<mailto:cpratt@bridgemi.com>]
Sent: Monday, January 26, 2015 11:35 AM
To: Busch, Stephen (DEQ)
Subject: interview for article on Flint drinking water

Hi,
I am a reporter for Bridge Magazine working on a deadline story about Flint's drinking water. My story will focus on state involvement and state policy.

My major questions:

1. Several agencies and officials are involved - can you clarify DEQ's role in the Flint water situation?

The City of Flint water system is one of over 1400 Community Water Systems in Michigan regulated under the Michigan Safe Drinking Water Act (1976 Public Act 399, as amended), which incorporates requirements of the federal Safe Drinking Water Act. The DEQ Office of Drinking Water and Municipal Assistance has been given authority for oversight of these regulations. DEQ regulatory oversight is mainly conducted through inspections, review of monitoring information (this includes sample results and operations data), issuance of construction permits for water systems, and planning (reliability, emergency response, capital improvement, operation and maintenance, etc.) As both community water systems and the DEQ desire the mutual goal of safe water, the DEQ works proactively in partnership with water systems to provide compliance assistance. This also includes activities such as source water protection and infrastructure funding.

2. What is the DEQ's response to the mayor's request for assistance?

As indicated by phone this letter was directed to the Governor's Office and should be followed up with that office for response at this point in time.

3. What on-going testing is DEQ doing with Flint water and how often?

The City is required to follow all state and federal monitoring requirements under Act 399. This includes sample analysis of over 90 contaminants with health based drinking water standards along with monitoring of its source, treatment, and distribution operations. Sample analysis frequency is based on the specific contaminant type, its level of detection if any, and its potential variability.

In regards to total coliform and e.coli bacteria compliance monitoring, the City is required to analyze at least 100 samples each monthly compliance period from its distribution system.

In regards to Total Trihalomethane (TTHM) compliance monitoring, the City is required to collect quarterly samples from 8 locations in its distribution system. The TTHM standard is based on a Running Annual Average for each of the 8 locations, rather than individual sample results. The location and

timing of these samples is based on worst case conditions in the water system to identify the highest level of long term exposure.

4. So far, how many drinking water violations have occurred in Flint since the switch to Flint River water and what sanctions - if any - does the city face?

The City has had the following Maximum Contaminant Level (MCL) standard violations:

E.Coli Acute bacteria MCL violation, August 2014

Total Coliform bacteria MCL violation, September 2014

TTHM locational running annual average MCL violation, October-December quarter (2 of 8 sites)

There are generally two requirements in regards to the violations: Public Notification and corrective action

Public Notice for acute health threats like the e.coli MCL must be made within 24 hours of the violation.

Public Notice for non-acute health threats such as total coliform bacteria and TTHM must be made within 30 days of the violation.

Corrective action regarding bacteria detections generally involves taking steps to disinfect and repair the affected areas and sampling to obtain confirmation the bacteria source is has been addressed.

The City has remained in compliance with this standard for each of the monthly monitoring periods since September, including thus far in January

Corrective action for TTHM involves taking steps to reduce the amount of TTHM so that they are below the standard. The City is required to complete an Operational Evaluation report within 90 days of the violation. This report includes examination of treatment and distribution operational practices (source water quality, treatment changes, storage tank operations, excess storage capacity, distribution system flushing, treatment problems that contribute to TTHM formation. The City proactively completed an Operational Evaluation following sample results from August 2014, and is now completing another operational evaluation further evaluated based on information from the November monitoring. November monitoring showed individual sample results now below the standard at 7 of 8 locations. However, as noted compliance is determined based on a running annual average at each location.

5. What does DEQ tell Flint residents who call DEQ with concerns about discolored water?

Callers indicating discoloration or other aesthetic water quality issues are directed to contact the Flint DPW to allow the DPW staff to investigate the situation. Generally color, odor and taste are aesthetic water quality issues not related to any health based standards including total coliform bacteria, e.coli bacteria, and TTHM.

Treated water is monitored for color at the Water Treatment Plant as part of its operation, and has not been abnormal. The City of Flint has over 500 miles of distribution piping and conditions in some isolated sections of water main piping or private premise plumbing may cause changes to aesthetic conditions such as color, taste, or odor.

Those are my major questions. Could you please give me a call today?

--

Chastity Pratt Dawsey

Reporter

Bridge Magazine/The Center for Michigan

28 W. Adams Suite 330, Detroit, MI 48226

www.bridgemi.com

C: 313-310-7867

Tommasulo, Karen (DEQ)

From: Tommasulo, Karen (DEQ)
Sent: Tuesday, July 07, 2015 10:29 AM
To: Wurfel, Brad (DEQ)
Subject: Call from ACLU reporter about Flint

I got a weird call from a "reporter" with the ACLU asking about Flint drinking water. His name is Curt Guyette, and I'm 98 percent sure it's the same guy who used to work at the Metro Times.

He said he heard from someone at EPA that we use a "flawed methodology" to collect our water samples. We apparently tell people to flush the water from their pipes, let it sit overnight, and then take the sample in the morning. He claims this doesn't measure what's in the main pipes, only in the pipes leading directly to their house. Consequently, he claims, we vastly underestimate lead. Apparently the EPA and Virginia Tech sampled a house using a different methodology and found 13,000 ppb lead.

Additionally, he claimed Flint is not adding corrosion control to their water, and said a city of their size should be doing so by law. But apparently we told Flint they didn't have to.

I didn't offer any comment, just took the message from him. Do you want to talk to him, or does this one need to go to Liane's shop? He's hoping to get ahold of someone today.

586-925-0493

Karen Tommasulo
Public Information Officer
Michigan Department of Environmental Quality
517-284-6716 | 517-599-5733
tommasulok@michigan.gov

Tommasulo, Karen (DEQ)

From: Pallone, Maggie (DEQ)
Sent: Friday, October 02, 2015 1:20 PM
To: Wurfel, Sara (GOV)
Cc: Wyant, Dan (DEQ); Wurfel, Brad (DEQ); Tommasulo, Karen (DEQ)
Subject: Re: Follow-up questions

The answers are below.

On Oct 2, 2015, at 12:31 PM, Wurfel, Sara (GOV) <Wurfels@michigan.gov> wrote:

Sent from my iPhone

Begin forwarded message:

From: "Kaffer, Nancy" <nkaffer@freepress.com>
Date: October 2, 2015 at 12:05:53 PM EDT
To: "Wurfel, Sara (GOV)" <Wurfels@michigan.gov>
Subject: Follow-up questions

- Reviewing my notes, I'm not sure I got a definitive answer from Wyant about corrosion control at the Flint water treatment plant. Was corrosion control in use? I'd like a simple yes or no, here – if no, obviously, why not – if yes, what was it, and why was – if any – what sounds like a lesser degree of corrosion control being used? I would like the names of the specific technologies/chemicals that were in use in the past, if in fact corrosion control was being used at the Flint plant, and the specific technologies that will be used going forward.

The plant was using a lime as a means of minimizing corrosion, which is an recognized corrosion control treatment by EPA. The two consequent monitoring results from December 2014 and June 2015 while meeting the action level were deemed optimal and were in fact increasing. As such the State sent s letter in August to require further optimization. We understand the City is going to use orthophosphate to fully optimize its system and that will happen this month.

- Was the MDEQ unaware that there were aging lead service lines in Flint, and that those would increase the lead risk? Were the Flint water treatment folks? Why was this not taken into account in developing the water treatment count?

The DEQ and City were aware that Flint, and many other older communities, has lead service lines. It was the City's decision to use lime as its first treatment option and to monitor to see its effectiveness. In some communities this treatment has been effective corrosion control.

- Wyant said that "two consecutive back to back tests" showed there was a problem; when were those tests performed and when were the results available?

Those test were performed in the six months leading up to Dec. 2014 and again June 2015. The results were made available to the residents that were tested, the City, and all testing results will soon be made available on the Flint water website the state has created. They overall results have always been available in the City's compliance documents.

Obviously I would like to use this information in a piece we'll have ready to go at 1:30p so ASAP would be great.

Nancy Kaffer
Columnist
Detroit Free Press
www.freep.com/abettermichigan
313-222-6585
@nancykaffer, @abettermi

Wurfel, Brad (DEQ)

From: Hollins, Harvey (GOV)
Sent: Thursday, September 03, 2015 1:32 PM
To: Wurfel, Brad (DEQ)
Subject: Fwd: PRESS RELEASE: MDEQ Testing of City of Flint Water Shows TTHM Levels are Well Below the Required Action Level, City No Longer in Violation
Attachments: Water Quality Update 9.2015.pdf; ATT00001.htm

Best,
Harvey Hollins III, Director
Governor's Office of Urban Initiatives

313.456.4994 (office)
313.600.4194 (Cell)

Begin forwarded message:

From: Jason Lorenz <jlorenz@cityofflint.com>
Date: September 3, 2015 at 11:27:06 AM EDT
To: undisclosed-recipients;;
Subject: PRESS RELEASE: MDEQ Testing of City of Flint Water Shows TTHM Levels are Well Below the Required Action Level, City No Longer in Violation

For Immediate Release

MDEQ Testing of City of Flint Water Shows TTHM Levels are Well Below the Required Action Level, City No Longer in Violation

Flint, Michigan – September 3, 2015 – The City of Flint has made significant improvements to its water treatment process and distribution system. Annual average results show all locations are within acceptable limits for total trihalomethanes (TTHM) and work continues to ensure that the average stays below the acceptable level. Flint's TTHM levels have now been below the actionable level for four consecutive quarters, long enough to bring the City out of violation with the Safe Water Drinking Act.

Installation of the Granulated Activated Carbon filter mediums in July has had a significant impact on the reduction of total organic carbon (TOC) and is expected to continue to do so. TOC contact with chlorine can lead to the creation of the chemical byproduct trihalomethanes. By reducing the amount of TOC in the treated water, the amount of TTHM in the water fell as a direct result.

“The City of Flint is continuing to improve its water system including both the areas of treatment and distribution,” said Mayor Dayne Walling. “As the issue of trihalomethanes comes under control and the City is no longer in violation of safety standards, it will work with the MDEQ on implementing water optimization measures to reduce the corrosive effects of water on older pipes and home service lines.” Older pipes and service lines can contain lead solder which can leach into the water over time.

Flint has been looking at the water optimization option for some time and is now looking at taking accelerated steps toward implementation. According to the MDEQ, a typical water optimization plan can take up to five years to complete, as in the case of the Detroit Water and Sewerage Department. The City of Flint plans to have its water optimization measures in place by the beginning of 2016. This measure, combined with the ongoing improvements to the distribution system wherever possible, will improve water quality and extend the performance of the City’s aging infrastructure.

“The City of Flint has been in constant communication with the MDEQ in our continuing efforts to upgrade and improve our water system,” said Director of Public Works Howard Croft. “We have received assurances from them that every step we have taken has been in line with their recommended actions. The City will continue to work to ensure safe, quality water to its residents, businesses and visitors.”

The City of Flint will continue to provide updates on its water progress through its website, cityofflint.com. Anyone with water issues is encouraged to call 810-766-7202 so that they can be addressed. Residents wishing to receive a free and independent in-home water test can call 810-787-6537 or email flintwater@cityofflint.com.

—END—

-Jason Lorenz

Public Information Officer
City of Flint
(810) 237-2039 (Office)
(810) 875-2576 (Cell)
jlorenz@cityofflint.com



Wurfel, Brad (DEQ)

From: Busch, Stephen (DEQ)
Sent: Wednesday, September 02, 2015 3:52 PM
To: Howes, Sarah (DEQ); Pallone, Maggie (DEQ); Wurfel, Brad (DEQ)
Cc: Shekter Smith, Liane (DEQ); Benzie, Richard (DEQ); Sygo, Jim (DEQ)
Subject: Flint Drinking Water TTHM return to compliance
Attachments: Flint-TTHM-Compliance.pdf

Attached is a letter being mailed by ODWMA regarding the City of Flint returning to compliance with the drinking water standard for the disinfection byproduct, total trihalomethane. Compliance with the standard has now been achieved at all 8 of the City's compliance monitoring locations based on monitoring in August 2015.

As past compliance issues related to this drinking water standard have been communicated with members of the legislature and those in the media, it may be desirable to distribute this updated information. This information is expected to generate inquiries from water system customers, news media, and the general public.

We will be happy to answer any questions regarding this matter.

Stephen Busch, P.E.
MDEQ Lansing District Coordinator
Office of Drinking Water and Municipal Assistance
Lansing and Jackson District Supervisor
517-643-2314
buschs@michigan.gov

Wurfel, Brad (DEQ)

From: Brown, Jessica (GOV)
Sent: Wednesday, June 10, 2015 3:18 PM
To: Wurfel, Brad (DEQ)
Subject: RE: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015

Yes, makes more sense. Thanks much!

From: Wurfel, Brad (DEQ)
Sent: Wednesday, June 10, 2015 3:14 PM
To: Brown, Jessica (GOV)
Subject: RE: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015

The standard they're required to meet is based on the average of the last four quarters of testing. That means several rounds of violation are usually required to trip the standard going in, but it also means that it takes several quarters' worth of clean test results to average it back off. And their results from last ... August, I think, were pretty high.

As noted in the language of the original note, ". It is however, important to note that all individual compliance sample results collected in both May and February were below the 0.080 mg/L levels."

Make more sense?

From: Brown, Jessica (GOV)
Sent: Wednesday, June 10, 2015 1:59 PM
To: Wurfel, Brad (DEQ)
Subject: RE: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015

Hi Brad,

I know you touched on this below and I read the letter, but I'm missing something here. When you get a minute can you explain how the city gets a violation letter if the water is technically fine? Am I right in my understanding that one testing location was still above .080 mg/L when testing was done in May but as of today, in June, all testing locations meet the requirement and are now under .080 mg/L?

Jess

From: Wurfel, Brad (DEQ)
Sent: Tuesday, June 09, 2015 3:45 PM
To: Brown, Jessica (GOV); Wurfel, Sara (GOV); Murray, David (GOV)
Cc: Smith, Jennifer (DCH); Wheaton, Bob (DHS)
Subject: FW: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015

Heads up, Flint is about to get another one of those letters from us. This is once again about the Total Trihalo Methanes. They remain in violation of the standard. The water is fine, but because the standard is based on the average of four quarterly tests, it takes awhile for the 'violation' status to work its way out of the numbers.

So it may get press, but it's not indicative of actual water quality violation in the present sense.
b

From: Busch, Stephen (DEQ)
Sent: Tuesday, June 09, 2015 12:39 PM
To: Howes, Sarah (DEQ); Pallone, Maggie (DEQ); Wurfel, Brad (DEQ)
Cc: Prysby, Mike (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ); Rosenthal, Adam (DEQ); Thelen, Mary Beth (DEQ); Devereaux, Tracy Jo (DEQ)
Subject: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015

Attached is a copy of the Violation Notice and Public Notice Template being mailed to the City of Flint by the DEQ Office of Drinking Water and Municipal Assistance regarding an exceedance of the Maximum Contaminant Level (MCL) standard for Total Trihalomethanes at certain locations within the City's drinking water distribution system.

This violation notice is in response to updated monitoring completed in May 2015, which shows the locational running annual average for one of the City's eight compliance sampling locations continues to exceed MCL standard of 0.080 mg/L. It is however, important to note that all individual compliance sample results collected in both May and February were below the 0.080 mg/L levels.

You are being provided an electronic copy of this notice as exceedance of this drinking water standard is expected to generate inquiries from water system customers, news media, and the general public.

Sarah Howes or Maggie Pallone will be informing members of the Michigan legislature.

If you have any questions or would like any additional information, you may contact Michael Prysby, District Engineer, DEQ-ODWMA at 517-290-8817, or you may contact me at the number below.

Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314

Wurfel, Brad (DEQ)

From: Brown, Jessica (GOV)
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Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314

Wurfel, Brad (DEQ)

From: Wheaton, Bob (DHS)
Sent: Tuesday, June 09, 2015 3:58 PM
To: Wurfel, Brad (DEQ)
Subject: RE: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015

Thanks, Brad. Since BCAL is now part of LARA rather than MDHHS, we might want to alert the folks at LARA about this – given the previous misstep of BCAL in issuing an advisory to day cares about Flint water.

I can do that, or you could do that if you'd prefer.

Thanks,
 Bob

From: Wurfel, Brad (DEQ)
Sent: Tuesday, June 09, 2015 3:45 PM
To: Brown, Jessica (GOV); Wurfel, Sara (GOV); Murray, David (GOV)
Cc: Smith, Jennifer (DCH); Wheaton, Bob (DHS)
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Subject: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015

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Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314

Wurfel, Brad (DEQ)

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Cc: Prysby, Mike (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ); Rosenthal, Adam (DEQ); Thelen, Mary Beth (DEQ); Devereaux, Tracy Jo (DEQ)
Subject: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015
Attachments: Flint VN TTHM 6_9_15.pdf

Attached is a copy of the Violation Notice and Public Notice Template being mailed to the City of Flint by the DEQ Office of Drinking Water and Municipal Assistance regarding an exceedance of the Maximum Contaminant Level (MCL) standard for Total Trihalomethanes at certain locations within the City's drinking water distribution system.

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Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314

Wurfel, Brad (DEQ)

From: Busch, Stephen (DEQ)
Sent: Friday, June 05, 2015 2:46 PM
To: Wurfel, Brad (DEQ); Howes, Sarah (DEQ); Shekter Smith, Liane (DEQ)
Cc: Pallone, Maggie (DEQ); Benzie, Richard (DEQ); Prysby, Mike (DEQ); Rosenthal, Adam (DEQ)
Subject: Draft Flint TTHM Violation Notice
Attachments: Flint DBP MCL 2Q15.pdf

Attached is a draft violation notice to the City of Flint regarding the exceedance of the drinking water standard for total trihalomethanes (TTHM) based on the latest round of samples collected in May 2015.

As predicted, the levels from the latest round are all again below the 80 part per billion level, but the annual average calculation for 1 of the 8 sites remains above the maximum contaminant level standard. An evaluation report is not required based on these lower levels but is still being requested given August are when levels historically peak. If levels remain low enough in August the City has the potential to start complying with the standard as the high levels from last year get dropped from the calculation. We could also end up with compliance with the standard but individual results above the 80 part per billion level.

We plan to get the letter out on Tuesday June 9 so please provide any comments/concerns/questions by Monday. An electronic copy of the signed letter will be provided to Maggie/Sarah for forwarding to legislative members in the Flint area as was done with the previous violation notices.

Again, if you have any questions, please contact me directly.

Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314

Wurfel, Brad (DEQ)

From: Howes, Sarah (DEQ)
Sent: Thursday, March 05, 2015 5:12 PM
To: Busch, Stephen (DEQ); Wurfel, Brad (DEQ); Datema, Maggie (DEQ)
Cc: Prysby, Mike (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ); Rosenthal, Adam (DEQ)
Subject: RE: Flint Drinking Water TTHM Standard Violation - 1st quarter 2015

I sent it to Reps Neeley and Phelps and Senator Ananich.

From: Busch, Stephen (DEQ)
Sent: Thursday, March 05, 2015 1:59 PM
To: Howes, Sarah (DEQ); Wurfel, Brad (DEQ); Datema, Maggie (DEQ)
Cc: Prysby, Mike (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ); Rosenthal, Adam (DEQ)
Subject: Flint Drinking Water TTHM Standard Violation - 1st quarter 2015
Importance: High

Attached is a copy of the Violation Notice and Public Notice Template being mailed to the City of Flint by the DEQ Office of Drinking Water and Municipal Assistance regarding an exceedance of the Maximum Contaminant Level (MCL) standard for Total Trihalomethanes at certain locations within the City's drinking water distribution system.

This violation notice is in response to updated monitoring completed in February 2015, which shows the locational running annual average for two of the City's eight compliance sampling locations continue to exceed MCL standard of 0.080 mg/L. It is however, important to note that all individual compliance sample results collected in February were well below the 0.080 mg/L levels.

You are being provided an electronic copy of this notice as exceedance of this drinking water standard is expected to generate inquiries from water system customers, news media, and the general public.

Sarah Howes will be informing members of the Michigan legislature.

If you have any questions or would like any additional information, you may contact Michael Prysby, District Engineer, DEQ-ODWMA at 517-290-8817, or you may contact me at the number below.

Stephen Busch, P.E.
 Lansing and Jackson District Supervisor
 Office of Drinking Water and Municipal Assistance
 MDEQ
 517-643-2314

Wurfel, Brad (DEQ)

From: Busch, Stephen (DEQ)
Sent: Thursday, March 05, 2015 1:59 PM
To: Howes, Sarah (DEQ); Wurfel, Brad (DEQ); Datema, Maggie (DEQ)
Cc: Prysby, Mike (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ); Rosenthal, Adam (DEQ)
Subject: Flint Drinking Water TTHM Standard Violation - 1st quarter 2015
Attachments: City of Flint VN - MCL TTHM 3-5-15.pdf
Importance: High

Attached is a copy of the Violation Notice and Public Notice Template being mailed to the City of Flint by the DEQ Office of Drinking Water and Municipal Assistance regarding an exceedance of the Maximum Contaminant Level (MCL) standard for Total Trihalomethanes at certain locations within the City's drinking water distribution system.

This violation notice is in response to updated monitoring completed in February 2015, which shows the locational running annual average for two of the City's eight compliance sampling locations continue to exceed MCL standard of 0.080 mg/L. It is however, important to note that all individual compliance sample results collected in February were well below the 0.080 mg/L levels.

You are being provided an electronic copy of this notice as exceedance of this drinking water standard is expected to generate inquiries from water system customers, news media, and the general public.

Sarah Howes will be informing members of the Michigan legislature.

If you have any questions or would like any additional information, you may contact Michael Prysby, District Engineer, DEQ-ODWMA at 517-290-8817, or you may contact me at the number below.

Stephen Busch, P.E.
 Lansing and Jackson District Supervisor
 Office of Drinking Water and Municipal Assistance
 MDEQ
 517-643-2314

Wurfel, Brad (DEQ)

From: Busch, Stephen (DEQ)
Sent: Monday, March 02, 2015 3:19 PM
To: Wurfel, Brad (DEQ); Howes, Sarah (DEQ); Shekter Smith, Liane (DEQ)
Cc: Datema, Maggie (DEQ); Benzie, Richard (DEQ); Prysby, Mike (DEQ); Rosenthal, Adam (DEQ)
Subject: Draft Flint TTHM Violation Notice for comment
Attachments: Flint DBP MCL 1Q15.doc

Importance: High

Attached is a draft violation notice to the City of Flint regarding the exceedance of the drinking water standard for total trihalomethanes (TTHM) based on the latest round of samples collected in February 2015.

As predicted, the levels from the latest round are all very low, but the annual average calculation for 2 sites remains above the maximum contaminant level standard.

We plan to get the letter out on Thursday so please provide any comments/concerns/questions by Wednesday 3/4. An electronic copy of the signed letter will be provided to Maggie/Sarah for forwarding to legislative members in the Flint area as was done with the last violation notice from December.

Again, if you have any questions, please contact me directly.

Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314

Wurfel, Brad (DEQ)

From: Busch, Stephen (DEQ)
Sent: Friday, February 27, 2015 2:11 PM
To: Shekter Smith, Liane (DEQ); Benzie, Richard (DEQ); Wurfel, Brad (DEQ)
Cc: Prysby, Mike (DEQ); Rosenthal, Adam (DEQ)
Subject: Updated Flint TTHM Results
Attachments: FLINT TTHM RESULTS.docx

Updated TTHM results from Flint are attached, and are as we expected.

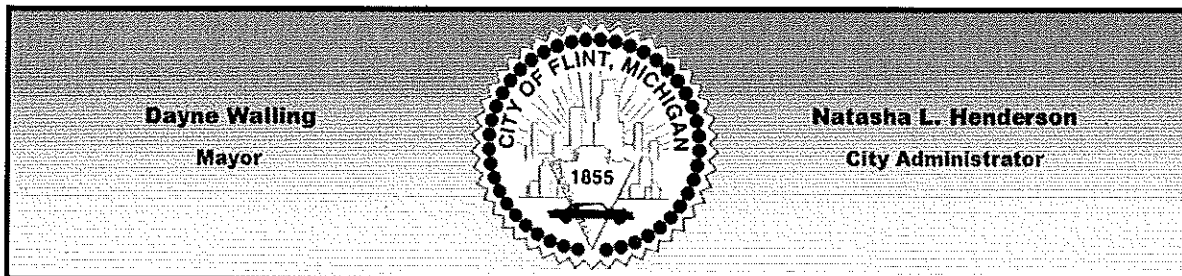
The highest sample individual result from February 2015 was 28.5 ppb, less than half the standard of 80 ppb.

The same two sites still exceed the LRAA MCL standard of 80 ppb due to high results from last summer, but the other 6 comply with the LRAA.

(FYI, if we were still under Stage 1 this wouldn't have ever been a standard violation, the RAA would have calculated out to 78 ppb.)

We are in the process of preparing a violation notice to the City and will have a copy to review and distribute to legislative members and other departments early next week.

Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314



Jason Lorenz
Public Information Officer
(810) 237-2039
jlorenz@cityofflint.com

For Immediate Release

MDEQ Testing of City of Flint Water Shows TTHM Levels are Well Below the Required Action Level, City No Longer in Violation

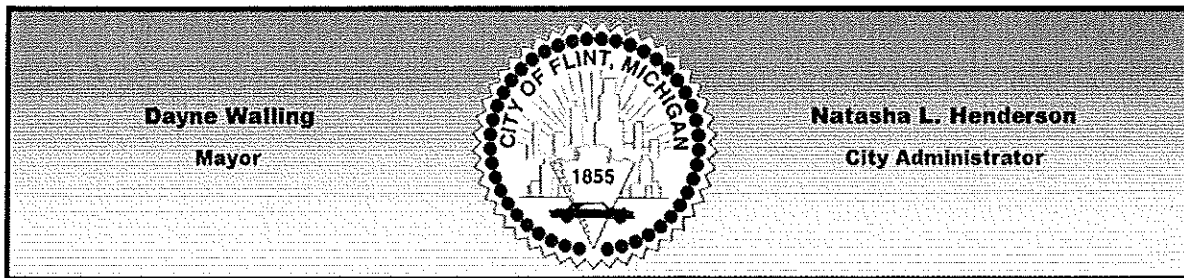
Flint, Michigan – September 3, 2015 – The City of Flint has made significant improvements to its water treatment process and distribution system. Annual average results show all locations are within acceptable limits for total trihalomethanes (TTHM) and work continues to ensure that the average stays below the acceptable level. Flint's TTHM levels have now been below the actionable level for four consecutive quarters, long enough to bring the City out of violation with the Safe Water Drinking Act.

Installation of the Granulated Activated Carbon filter mediums in July has had a significant impact on the reduction of total organic carbon (TOC) and is expected to continue to do so. TOC contact with chlorine can lead to the creation of the chemical byproduct trihalomethanes. By reducing the amount of TOC in the treated water, the amount of TTHM in the water fell as a direct result.

"The City of Flint is continuing to improve its water system including both the areas of treatment and distribution," said Mayor Dayne Walling. "As the issue of trihalomethanes comes under control and the City is no longer in violation of safety standards, it will work with the MDEQ on implementing water optimization measures to reduce the corrosive effects of water on older pipes and home service lines." Older pipes and service lines can contain lead solder which can leach into the water over time.

–CONTINUE–

City Hall
1101 S. Saginaw Street - Flint, Michigan 48502
810-766-7346 FAX: 810-766-7218 www.cityofflint.com



Flint has been looking at the water optimization option for some time and is now looking at taking accelerated steps toward implementation. According to the MDEQ, a typical water optimization plan can take up to five years to complete, as in the case of the Detroit Water and Sewerage Department. The City of Flint plans to have its water optimization measures in place by the beginning of 2016. This measure, combined with the ongoing improvements to the distribution system wherever possible, will improve water quality and extend the performance of the City's aging infrastructure.

"The City of Flint has been in constant communication with the MDEQ in our continuing efforts to upgrade and improve our water system," said Director of Public Works Howard Croft. "We have received assurances from them that every step we have taken has been in line with their recommended actions. The City will continue to work to ensure safe, quality water to its residents, businesses and visitors."

The City of Flint will continue to provide updates on its water progress through its website, cityofflint.com. Anyone with water issues is encouraged to call 810-766-7202 so that they can be addressed. Residents wishing to receive a free and independent in-home water test can call 810-787-6537 or email flintwater@cityofflint.com.

—END—



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 2, 2015

Mr. Brent Wright, Operations Supervisor
City Of Flint – Department of Public Works
Flint Water Plant
4500 North Dort Highway
Flint, Michigan 48505

WSSN: 02310

Dear Mr. Wright:

SUBJECT: City of Flint – Water Supply
Return to Compliance Total Trihalomethanes (TTHM)
3rd Quarter 2015 Monitoring Period

The Department of Environmental Quality (DEQ), Office of Drinking Water and Municipal Assistance (ODWMA), records show that the City of Flint (City) has returned to compliance with the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399); R 325.10610, *Maximum contaminant levels for disinfection byproducts (MCLs)*, of the 1979 Administrative Code.

In accordance with Administrative Rule 610 (R 325.10610, *MCLs for disinfection byproducts*), the MCL for the disinfection byproduct TTHM is 0.080 milligrams per liter (mg/L). Compliance is determined based on a Locational Running Annual Average (LRAA) at each monitoring location. As listed in the table below, our records show that the LRAA all eight of the City's TTHM compliance sampling sites now comply with this standard based on the last four quarterly monitoring periods, ending August 31, 2015. This return to compliance regarding TTHM's began on September 1, 2015, and will continue as long as the LRAA at each of the City's TTHM compliance sampling sites remain below this standard.

TTHM Results (mg/L)	11/20/14	2/17/15	5/18/15	8/18/15	LRAA	OEL
DBP1 McDonalds 3719 Davison	0.059	0.0162	0.0514	0.0755	0.050	0.055
DBP2 Liquor Palace 3302 South Dort Highway	0.033	0.0168	0.0635	0.0532	0.042	0.047
DBP3 North Flint Auto 6204 North Saginaw St.	0.041	0.0149	0.0452	0.0426	0.036	0.036
DBP4 University Market 2501 Flushing Road	0.094	0.0245	0.0598	0.0706	0.062	0.056
DBP5 Taco Bell 3606 Corunna Road	0.034	0.0151	0.0547	0.0619	0.042	0.049
DBP6 Rite-Aid Pharmacy 5018 Clio Road	0.054	0.0192	0.0605	0.0595	0.048	0.050
DBP7 Salem Housing 3216 MLK Boulevard	0.050	0.0285	0.0727	0.0903	0.060	0.070
DBP8 BP Gas Station 822 South Dort Highway	0.036	0.0199	0.0461	0.0549	0.039	0.044

Mr. Brent Wright

2

September 2, 2015

Corrective measures by the City have been successful in achieving compliance with this standard. These measures have included replacement of anthracite filter media with granular activated carbon as well as the optimization of water treatment plant and distribution system processes and operations as recommended through Operational Evaluations conducted by the City. It is important that the City continue to follow these recommendations in order to limit disinfection byproduct formation and maintain compliance with the MCL LRAA standards. While the MCL LRAA standard has now been met at all eight compliance sampling sites, an individual TTHM concentration above 0.080 mg/L was measured at one location, DBP 7, during peak month sampling in August 2015.

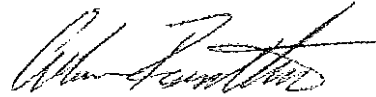
The DEQ encourages the City to continue informing customers about this updated water quality information and compliance with the TTHM MCL standard.

If you have any questions regarding this letter, please contact us at the numbers below; at prysbym@michigan.gov; or rosenthala@michigan.gov.

Sincerely,



Michael F. Prysby, P.E., District Engineer
Lansing District Office
Office of Drinking Water and
Municipal Assistance
517-290-8817



Adam Rosenthal, Environmental Quality
Analyst
Lansing District Office
Office of Drinking Water and
Municipal Assistance
517-284-6644

cc: Ms. Jennifer Crooks, U.S. Environmental Protection Agency, Region 5
Mr. Robert Bincsik, City of Flint
Mr. Howard Croft, City of Flint
Mr. Michael Glasgow, City of Flint
Genesee County Health Department
Mr. Stephen Busch, DEQ

Wurfel, Brad (DEQ)

From: Busch, Stephen (DEQ)
Sent: Tuesday, June 09, 2015 12:39 PM
To: Howes, Sarah (DEQ); Pallone, Maggie (DEQ); Wurfel, Brad (DEQ)
Cc: Prysby, Mike (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ); Rosenthal, Adam (DEQ); Thelen, Mary Beth (DEQ); Devereaux, Tracy Jo (DEQ)
Subject: Flint Drinking Water TTHM Standard Violation - 2nd quarter 2015
Attachments: Flint VN TTHM 6_9_15.pdf

Attached is a copy of the Violation Notice and Public Notice Template being mailed to the City of Flint by the DEQ Office of Drinking Water and Municipal Assistance regarding an exceedance of the Maximum Contaminant Level (MCL) standard for Total Trihalomethanes at certain locations within the City's drinking water distribution system.

This violation notice is in response to updated monitoring completed in May 2015, which shows the locational running annual average for one of the City's eight compliance sampling locations continues to exceed MCL standard of 0.080 mg/L. It is however, important to note that all individual compliance sample results collected in both May and February were below the 0.080 mg/L levels.

You are being provided an electronic copy of this notice as exceedance of this drinking water standard is expected to generate inquiries from water system customers, news media, and the general public.

Sarah Howes or Maggie Pallone will be informing members of the Michigan legislature.

If you have any questions or would like any additional information, you may contact Michael Prysby, District Engineer, DEQ-ODWMA at 517-290-8817, or you may contact me at the number below.

Stephen Busch, P.E.
Lansing and Jackson District Supervisor
Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

June 9, 2015

Mr. Brent Wright, Operations Supervisor
City Of Flint – Department of Public Works
Flint Water Plant
4500 North Dort Highway
Flint, Michigan 48505

WSSN: 02310

Dear Mr. Wright:

SUBJECT: Violation Notice (VN) – Maximum Contaminant Level for Total
Trihalomethanes (TTHM)
2nd Quarter 2015 Monitoring Period

The Department of Environmental Quality (DEQ), Office of Drinking Water and Municipal Assistance (ODWMA), records show that the city of Flint (City) is in violation of the Safe Drinking Water Act, 1976 PA 399, as amended (Act 399); R 325.10610, *Maximum contaminant levels for disinfection byproducts (MCLs)*, of the 1979 Administrative Code.

In accordance with R 325.10610, *MCLs*, of the 1979 Administrative Code, the MCL for disinfection byproduct TTHM is 0.080 milligrams per liter (mg/L) as a Locational Running Annual Average (LRAA) at each monitoring location. As listed in the table below, our records show that the City's highest TTHM LRAA, based on the last four quarters, ending June 30, 2015, is 0.094 mg/L which exceeds the standard, and at this time only one of the eight sample site locations exceed the LRAA standard of 0.080 mg/L.

Our investigation consisted of a review of ODWMA files for laboratory reports received for compliance monitoring. Our investigation is considered complete. This violation began on June 1, 2015, and will continue until the TTHM LRAA is below the MCL at all sample sites.

Mr. Brent Wright

2

June 9, 2015

TTHM Results (mg/L)						
	8/21/14	11/20/14	2/17/15	5/18/15	LRAA	OEL
DBP1 McDonalds 3719 Davison	0.145	0.059	0.0162	0.0514	0.068	0.044
DBP2 Liquor Palace 3302 South Dort Highway	0.127	0.033	0.0168	0.0635	0.060	0.044
DBP3 North Flint Auto 6204 North Saginaw St.	0.118	0.041	0.0149	0.0452	0.055	0.037
DBP4 University Market 2501 Flushing Road	0.196	0.094	0.0245	0.0598	0.094	0.059
DBP5 Taco Bell 3606 Corunna Road	0.181	0.034	0.0151	0.0547	0.072	0.040
DBP6 Rite-Aid Pharmacy 5018 Clio Road	0.144	0.054	0.0192	0.0605	0.069	0.048
DBP7 Salem Housing 3216 MLK Boulevard	0.112	0.050	0.0285	0.0727	0.066	0.056
DBP8 BP Gas Station 822 South Dort Highway	0.112	0.036	0.0199	0.0461	0.054	0.037

We are encouraged by the results from the most recent round of compliance samples collected on May 18, 2015, which again show individual TTHM levels below 0.080 mg/L at all locations throughout the City's system. Operational Evaluation Reports from December 2014, February 2015, and May 2015, have identified possible causes and corrective measures for the previous elevated TTHM levels which we encourage the City to continue implementing. These modifications have likely contributed in part to the reduction in TTHM levels reported for the most recent quarter in comparison to levels in May 2014, and suggest the City may be able to achieve compliance with the TTHM standard at all sites by continuing these efforts.

Our office is currently reviewing the Operational Evaluation Report dated May 29, 2015, and will provide the City and their consultant with comments, as needed, to help address this MCL violation.

Further, the TTHM operational evaluation level (OEL) calculated in accordance with R 325.10719I, *Disinfection byproducts: operational evaluation levels*, of the 1979 Administrative Code, is now below the 0.080 mg/L operational evaluation trigger at all eight sample site locations. However, our office is requesting that an operational evaluation again be conducted incorporating the most recent sample results, given the increase in TTHM levels from February 2015 results, and that the next monitoring period of August has been identified as the City's peak month for TTHM levels. **Please provide our office with an updated Operational Evaluation Report by Monday, August 31, 2015.**

If you have any other factual information you would like us to consider regarding the violation identified in this VN, please provide them in a written response by June 23, 2015.

Mr. Brent Wright

3

March 5, 2015

Administrative rule R 325.10403 of Act 399 requires that suppliers provide public notice (PN) as soon as practical, but no later than thirty (30) days after the supplier learns of this type of violation, by mail or direct delivery and by any other means reasonably calculated to reach customers not normally reached by mail. Enclosed is a sample PN which contains the minimum required language. The City is encouraged to include additional information regarding its response efforts to this violation. **Please notify your consumers by July 1, 2015, and send us a signed and dated copy of the notice that you issued within ten (10) days of distributing the PN.** This violation must also be included in your 2015 Consumer Confidence Report, due by July 1, 2016. The PN must be repeated every quarter until you no longer exceed the TTHM standard. Failure to issue a PN for this violation will result in a fine of at least \$1,000 per event, with a maximum of \$5,000 per violation.

We anticipate and appreciate your continued cooperation in resolving this matter. If you have any questions regarding this VN, please contact us at the numbers below; at prysbym@michigan.gov; or rosenthala@michigan.gov; or at DEQ, P.O. Box 30242, Lansing, Michigan 48909-7742.

Sincerely,

Michael F. Prysby, P.E., District Engineer
Lansing District Office
Office of Drinking Water and
Municipal Assistance
517-290-8817

Adam Rosenthal, Environmental Quality
Analyst
Lansing District Office
Office of Drinking Water and
Municipal Assistance
517-284-6644

Enclosure

cc: Ms. Jennifer Crooks, U.S. Environmental Protection Agency, Region 5
Mr. Robert Bincsik, City of Flint
Mr. Howard Croft, City of Flint
Mr. Michael Glasgow, City of Flint
Genesee County Health Department
Ms. Liane Shekter Smith, DEQ
Mr. Richard Benzie, DEQ
Mr. Stephen Busch, DEQ

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

City of Flint Did Not Meet Treatment Requirements

Our water system recently violated a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Samples were collected for total trihalomethanes (TTHM) analysis from eight locations on a quarterly basis (August 21, November 20 of 2014, and February 17 & May 18 of 2015). The average of the results at ANY of the eight locations must not exceed the maximum contaminant level (MCL) for TTHMs, otherwise our water system exceeds the MCL. The standard for TTHMs is 80 micro grams per liter ($\mu\text{g/L}$). The location reporting the highest TTHM level was 94 $\mu\text{g/L}$; thus, our water system exceeds the TTHM MCL.

What should I do?

- There is nothing you need to do unless you have a severely compromised immune system, have an infant, or are elderly. These people may be at increased risk and should seek advice about drinking water from their health care providers.
- You do not need to boil your water or take other corrective actions. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours.

What does this mean?

This is not an emergency. If it had been an emergency, you would have been notified within 24 hours.

People who drink water containing trihalomethanes in excess of the MCL over many years may experience problems with their liver, kidneys, or central nervous system, and may have an increased risk of getting cancer.

What is being done?

We are currently working on solutions to correct the problem. We anticipate resolving the problem in 2015. Our most recent individual sample results were all less than the 80 $\mu\text{g/L}$ standard, however since compliance is calculated using a locational running annual average (LRAA) of the most recent four quarters, we are still out of compliance with the MCL at one of eight locations.

For more information, please contact Mr. Brent Wright at 517-787-6537, or the Flint Water Plant at 4500 North Dort Highway, Flint, Michigan 48505.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by the City of Flint.

CERTIFICATION:

WSSN: 02310

I certify that this water supply has fully complied with the public notification requirements in the Michigan Safe Drinking Water Act, 1976 PA 399, as amended, and the administrative rules.

Signature	Title	Date Distributed
Reminder to water supplier: This notice/certification must be sent to the Department of Environmental Quality.		



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 5, 2015

Mr. Brent Wright, Operations Supervisor
City Of Flint - DPW
Flint Water Plant
4500 North Dort Highway
Flint, Michigan 48505

WSSN: 02310

Dear Mr. Wright:

SUBJECT: Violation Notice (VN) – Maximum Contaminant Level for Total
Trihalomethanes (TTHM)
Operational Evaluation – Total Trihalomethanes
1st Quarter 2015 Monitoring Period

The Department of Environmental Quality (DEQ), Office of Drinking Water and Municipal Assistance (ODWMA), records show that the city of Flint (City) is in violation of the Safe Drinking Water Act, 1976 PA 399, as amended (Act 399); R 325.10610, *Maximum contaminant levels for disinfection byproducts (MCLs)*, of the 1979 Administrative Code.

In accordance with R 325.10610, *MCLs*, of the 1979 Administrative Code, the MCL for disinfection byproduct TTHM is 0.080 milligrams per liter (mg/L) as a Locational Running Annual Average (LRAA) at each monitoring location. As listed in the table below, our records show that the City's highest TTHM locational running annual average (LRAA), based on the last four quarters, ending February 28, 2015, is 0.105 mg/L which exceeds the standard, and that two of the eight sample site locations exceed the standard of 0.080 mg/L.

Further, in accordance with R 325.10719I, *Disinfection byproducts: operational evaluation levels*, of the 1979 Administrative Code, when an operational evaluation level (OEL) at a monitoring location for TTHM exceeds 0.080 mg/L, a supply shall conduct an operational evaluation and submit a written report of the evaluation to the DEQ not later than 90 days after being notified of the analytical result that causes the supply to exceed the operational evaluation level. As listed in the table below, our records show that the TTHM OELs for the City exceed 0.080 mg/L at one of the City's eight sample site locations.

Mr. Brent Wright

2

March 5, 2015

TTHM Results (mg/L)	5/21/14	8/21/14	11/20/14	2/17/15	LRAA	OEL
DBP1 McDonalds 3719 Davison	0.162	0.145	0.059	0.0162	0.096	0.059
DBP2 Liquor Palace 3302 S. Dort Highway	0.112	0.127	0.033	0.0168	0.072	0.049
DBP3 North Flint Auto 6204 N. Saginaw St.	0.097	0.118	0.041	0.0149	0.068	0.047
DBP4 University Market 2501 Flushing Road	0.106	0.196	0.094	0.0245	0.105	0.085
DBP5 Taco Bell 3606 Corunna Road	0.079	0.181	0.034	0.0151	0.078	0.063
DBP6 Rite-Aid Pharmacy 5018 Clio Road	0.088	0.144	0.054	0.0192	0.076	0.059
DBP7 Salem Housing 3216 MLK Boulevard	0.082	0.112	0.050	0.0285	0.068	0.055
DBP8 BP Gas Station 822 S. Dort Highway	0.075	0.112	0.036	0.0199	0.061	0.047

Our investigation consisted of a review of ODWMA files for laboratory reports received for compliance monitoring. Our investigation is considered complete. This violation began on March 1, 2015, and will continue until TTHM LRAA is below the MCL at all sample sites.

We are encouraged by the results from the most recent round of compliance samples collected on February 17, 2015, which now show individual TTHM levels at less than half of the 0.080 mg/L standard at all locations throughout the City's system. Operational Evaluation Reports from December 2014, and February 2015, have identified possible causes and corrective measures for the previous elevated TTHM levels which we encourage the City to continue implementing. These modifications have likely contributed in part to the reduction in TTHM levels reported in the most recent quarter, and suggest the City may be able to achieve compliance with the TTHM standard at all sites by continuing these efforts.

Our office is currently reviewing the Operational Evaluation Report dated February 27, 2015, and will provide the City and their consultant with comments, as needed, to help address this MCL violation.

Water systems that exceed the OEL must complete and submit an Operational Evaluation in accordance with Administrative Rule 719I (R 325.10719I) within 90 days of being notified of the violation. **An updated Operational Evaluation report, which incorporates the most recent sample results, must now be completed and received by our office by no later than Friday, May 29, 2015.**

If you have any other factual information you would like us to consider regarding the violation identified in this VN, please provide them in a written response by March 19, 2015.

Mr. Brent Wright

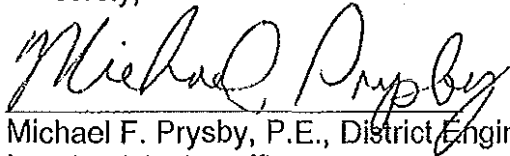
3

March 5, 2015

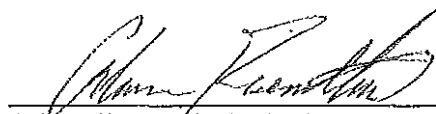
Administrative rule R 325.10403 of Act 399 requires that suppliers provide public notice (PN) as soon as practical, but no later than thirty (30) days after the supplier learns of this type of violation, by mail or direct delivery and by any other means reasonably calculated to reach customers not normally reached by mail. Enclosed is a sample PN which contains the minimum required language. The City is encouraged to include additional information regarding its response efforts to this violation. **Please notify your consumers by April 1, 2015, and send us a signed and dated copy of the notice that you issued within ten (10) days of distributing the public notice.** This violation must also be included in your 2015 Consumer Confidence Report, due by July 1, 2016. The PN must be repeated every quarter until you no longer exceed the TTHM standard. Failure to issue a PN for this violation will result in a fine of at least \$1,000 per event, with a maximum of \$5,000 per violation.

We anticipate and appreciate your continued cooperation in resolving this matter. If you have any questions regarding this VN, please contact us at the numbers below; at prysbym@michigan.gov; or rosenthala@michigan.gov; or at DEQ, P.O. Box 30242, Lansing, Michigan 48909-7742.

Sincerely,



Michael F. Prysby, P.E., District Engineer
Lansing District Office
Office of Drinking Water and Municipal
Assistance
517-290-8817



Adam Rosenthal, Environmental Quality
Analyst
Lansing District Office
Office of Drinking Water and Municipal
Assistance
517-284-6644

Enclosure

cc: Ms. Jennifer Crooks, U.S. Environmental Protection Agency, Region 5
Mr. Jerry Ambrose, Emergency Manager, City of Flint
Mr. Robert Bincsik, City of Flint
Mr. Howard Croft, City of Flint
Mr. Daughtry Johnson, City of Flint
Genesee County Health Department
Ms. Liane Shekter Smith, DEQ
Mr. Richard Benzie, DEQ
Mr. Stephen Busch, DEQ

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER

City of Flint Did Not Meet Treatment Requirements

Our water system recently violated a drinking water standard. Although this incident was not an emergency, as our customers, you have a right to know what happened and what we are doing to correct this situation.

We routinely monitor for the presence of drinking water contaminants. Samples were collected for total trihalomethanes (TTHM) analysis from eight locations on a quarterly basis (May 21, August 21, November 20 of 2014, and February 17, 2015). The average of the results at ANY of the eight locations must not exceed the maximum contaminant level (MCL) for TTHMs, otherwise our water system exceeds the MCL. The standard for TTHMs is 80 micro grams per liter ($\mu\text{g/L}$). The location reporting the highest TTHM level was 105 $\mu\text{g/L}$; thus, our water system exceeds the TTHM MCL.

What should I do?

- There is nothing you need to do unless you have a severely compromised immune system, have an infant, or are elderly. These people may be at increased risk and should seek advice about drinking water from their health care providers.
- You do not need to boil your water or take other corrective actions. If a situation arises where the water is no longer safe to drink, you will be notified within 24 hours.

What does this mean?

This is not an emergency. If it had been an emergency, you would have been notified within 24 hours.

People who drink water containing trihalomethanes in excess of the MCL over many years may experience problems with their liver, kidneys, or central nervous system, and may have an increased risk of getting cancer.

What is being done?

We are currently working on solutions to correct the problem. We anticipate resolving the problem in 2015. Our most recent individual sample results were all less than half the 80 $\mu\text{g/L}$ standard, however since compliance is calculated using a locational running annual average (LRAA) of the most recent four quarters, we are still out of compliance with the MCL at two of eight locations.

For more information, please contact Mr. Brent Wright at 517-787-6537, or the Flint Water Plant at 4500 North Dort Highway, Flint, Michigan 48505.

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by the City of Flint.

CERTIFICATION:

WSSN: 02310

I certify that this water supply has fully complied with the public notification requirements in the Michigan Safe Drinking Water Act, 1976 PA 399, as amended, and the administrative rules.

Signature

Title

Date Distributed

Reminder to water supplier: This notice/certification must be sent to the Department of Environmental Quality.



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 5, 2015 - DRAFT

Mr. Brent Wright, Operation Supervisor
City Of Flint - DPW
Flint Water Plant
4500 North Dort Highway
Flint, MI 48505

WSSN: 02310

Dear Mr. Wright:

SUBJECT: Violation Notice – Maximum Contaminant Level for Total Trihalomethanes
Operational Evaluation – Total Trihalomethanes
1st Quarter 2015 Monitoring Period

The Department of Environmental Quality (DEQ), Office of Drinking Water and Municipal Assistance (ODWMA), records show that the City of Flint is in violation of the Safe Drinking Water Act, 1976 PA 399, as amended (Act 399); R 325.10610, *Maximum contaminant levels (MCL) for disinfection byproducts*, of the 1979 Administrative Code.

In accordance with R.325.10610, *MCLs for disinfection byproducts*, of the 1979 Administrative Code, the MCL for disinfection byproduct total trihalomethanes (TTHM) is 0.080 milligrams per liter (mg/L) as a Locational Running Annual Average (LRAA) at each monitoring location. As listed in the table below, our records show that the City of Flint's highest TTHM locational running annual average (LRAA), based on the last four quarters, ending February 28, 2015, is 0.105 mg/l which exceeds the standard, and that two of the eight sample site locations exceed the standard of 0.080 mg/L.

Further, in accordance with R325.107191, *Disinfection byproducts: operational evaluation levels*, of the 1979 Administrative Code, when an operational evaluation level (OEL) at a monitoring location for TTHM exceeds 0.080 mg/L, a supply shall conduct an operational evaluation and submit a written report of the evaluation to the department not later than 90 days after being notified of the analytical result that causes the supply to exceed the operational evaluation level. As listed in the table below, our records show that TTHM operational evaluation levels for the City of Flint exceed 0.080 mg/L at one of the City's eight sample site locations.

TTHM Results (mg/L)						
	5/21/14	8/21/14	11/20/14	2/17/15	LRAA	OEL
DBP1 McDonalds 3719 Davison	0.162	0.145	0.059	0.0162	0.096	0.059
DBP2 Liquor Palace 3302 S. Dort Highway	0.112	0.127	0.033	0.0168	0.072	0.049
DBP3 North Flint Auto 6204 N. Saginaw St.	0.097	0.118	0.041	0.0149	0.068	0.047
DBP4 University Market 2501 Flushing Road	0.106	0.196	0.094	0.0245	0.105	0.085
DBP5 Taco Bell 3606 Corunna Road	0.079	0.181	0.034	0.0151	0.078	0.063
DBP6 Rite-Aid Pharmacy 5018 Clio Road	0.088	0.144	0.054	0.0192	0.076	0.059
DBP7 Salem Housing 3216 MLK Boulevard	0.082	0.112	0.050	0.0285	0.068	0.055
DBP8 BP Gas Station 822 S. Dort Highway	0.075	0.112	0.036	0.0199	0.061	0.047

Our investigation consisted of a review of ODWMA files for laboratory reports received for compliance monitoring. Our investigation is considered complete. This violation began on March 1, 2015, and will continue until TTHM LRAA is below the MCL at all sample sites.

We are encouraged by the results from the most recent round of compliance samples collected on February 17, 2015, which now show individual TTHM levels at less than half of the 0.080 mg/L standard at all locations throughout the City's system. Operational Evaluation Reports from December 2014 and February 2015 have identified possible causes and corrective measures for the previous elevated TTHM levels which we encourage the City continue implementing. These modifications have likely contributed in part to the reduction in TTHM levels reported in the most recent quarter, and suggest the City may be able to achieve compliance with the TTHM standard at all sites by continuing these efforts.

Our office is currently reviewing the Operational Evaluation report dated February 27, 2015, and will provide the City and their consultant comments as needed to help address this MCL violation.

Water systems that exceed the OEL must complete and submit an Operational Evaluation in accordance with Administrative Rule 719I (R325.10719I) within 90 days of being notified of the violation. **An updated Operational Evaluation report, which incorporates the most recent sample results, must now be completed and received by our office by no later than Friday May 29, 2015.**

If you have any other factual information you would like us to consider regarding the violation identified in this Violation Notice (VN), please provide them in a written response by March 19, 2015.

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Lansing District Office
Office of Drinking Water & Municipal
Assistance
517-290-8817

Adam Rosenthal, EQA
Lansing District Office
Office of Drinking Water & Municipal
Assistance
517-284-6644

mfp/ar/jlr
Enclosure

cc: Mr. Jerry Ambrose, Emergency Manager, City of Flint
Mr. Daughtry Johnson, City of Flint
Mr. Howard Croft, City of Flint
Mr. Robert Bincsik, City of Flint
Ms. Jennifer Crooks, U.S. Environmental Protection Agency, Region 5
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Signature

Title

Date Distributed

Reminder to water supplier: This notice / certification must be sent to the DEQ.

FLINT TTHM RESULTS

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