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To: [Benzie, Richard \(DEQ\)](#); [Cook, Pat \(DEQ\)](#)
Subject: Draft response language
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See my draft response below. I would like to include someone from EPA that is working on the LCR as a cc on this so they are aware of what this individual is asking.

I'm sorry for the delay in my response. As some of your questions relate more to statewide program implementation I have requested assistance with the response from staff within our central program office. However, these staff were attending and participating in our American Water Works Association Conference Michigan Section conference last week.

Michigan has implemented an EPA approved modified consecutive system approach to lead and copper monitoring where a wholesale water supply sells water to other community water systems. In addition, while water quality parameter monitoring occurs at both the water treatment plant and in the combined distribution system, a water quality parameter range is only required to be established at the water treatment plant tap upon designation of having optimized corrosion control treatment.

Thus when the City of Flint was a customer of the Detroit Water and Sewerage Department (DWSD), the City of Flint participated in water quality parameter monitoring of its distribution system, but ranges were established only for the OCCT at DWSD treatment plants. The attached letter from our Department established the minimum levels for pH and phosphate dosage in 2000.

As the City of Flint water treatment plant has not yet installed such treatment or been given the designation of OCCT as a separate water system these plant tap values have not been established.

However, the City of Flint WTP has continued to maintain the minimum pH value requirement previously established for DWSD

As noted in your Working Group Report to the NDWAC, "Corrosion Control Treatment (CCT) involves the addition of chemicals (e.g. orthophosphates or silicate) to create a barrier between the pipes and the drinking water, or to modify drinking water chemistry (such as pH and hardness) to inhibit the potential for corrosion."

Should the Flint WTP softening process be considered to be OCCT, then the City already continues to comply with the OCCT requirements as the City of Flint has never had 10% or more of compliance tap samples exceed the 15 ppb action level. Even prior to DWSD's established OCCT the City of Flint has never exceeded the 15 ppb action level.

If you have additional questions we would appreciate having them routed through the NDWAC and your Working Group. Thanks.

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