
From: Busch, Stephen (DEQ)
Sent: Tuesday, September 15, 2015 7:21 PM
To: Wyant, Dan (DEQ); Shekter Smith, Liane (DEQ)
Cc: Pallone, Maggie (DEQ); Wurfel, Brad (DEQ); Richard Benzie P.E. (BENZIER@michigan.gov)
Subject: RE: Questions for Director Wyant
Attachments: NDWAC LCR Work Group Report Final 08 24 2015.pdf

See my responses below in red.

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buschs@michigan.gov

From: Wyant, Dan (DEQ)
Sent: Tuesday, September 15, 2015 6:19 PM
To: Shekter Smith, Liane (DEQ); Busch, Stephen (DEQ)
Cc: Pallone, Maggie (DEQ); Wurfel, Brad (DEQ)
Subject: Fwd: Questions for Director Wyant

I will need to respond to this.

Sent from my iPhone

Begin forwarded message:

From: "Thelen, Mary Beth (DEQ)" <THELENM2@michigan.gov>
Date: September 11, 2015 at 7:14:12 PM EDT
To: "Wyant, Dan (DEQ)" <WyantD@michigan.gov>
Subject: FW: Questions for Director Wyant

I will also print for you – see below.

From: Jumana Vasi [<mailto:JVasi@mott.org>]
Sent: Friday, September 11, 2015 5:29 PM
To: Thelen, Mary Beth (DEQ)
Subject: Questions for Director Wyant

Hi Mary Beth –

Thank you for arranging my call with the Director. He's asked me to send my follow-up questions in writing, so here they are below. Could you please forward them to him?

Thank you,
Jumana

Dan –

Thank you so very much for your time this afternoon. Here are the questions we've got concerning Flint drinking water.

- The Lead and Copper Rule requires water systems to obtain prior approval from the State to add a new source of water or make any long-term change in water treatment process prior to implementation. Did the DEQ have any concerns related to the switch from Detroit water to Flint River water in terms of potential increases in corrosion?

Prior to becoming a customer of Detroit in the 1960's, the City of Flint operated its water treatment plant and obtained water from the Flint River. As Detroit was unable to provide a secondary feed to Flint, the City of Flint choose to keep its water treatment plant as an emergency backup. In 2014 service from Detroit was terminated and the City of Flint began using its water treatment plant again. Differences in water quality have long been recognized between treated Lake Huron water obtained from Detroit and Flint's treatment of Flint River water. Whenever community water systems make changes in source water or treatment that could impact corrosion they are required to return to full scale lead and copper monitoring for two six month rounds to demonstrate continued compliance with the action levels. The City of Flint has just completed this monitoring and met the action level.

- The corrosivity of Flint's drinking water seems to be the main contributor to lead levels from residential faucets*. Does the state offer recommendations (treatment options, consumer use guidelines, etc.) for dealing with water that is considered to be "highly corrosive"?

As a water system that serves a population of 50,000 or more, the City of Flint is also required to demonstrate optimized corrosion control in accordance with the lead and copper rule requirements. The City is in the process of installing additional corrosion control treatment measures. Should the City's compliance monitoring exceed the action level in future additional steps would be required following the lead and copper rule requirements.

Customers that participate in the City's lead monitoring are provided a copy of their result and information regarding actions they can take to help limit exposure see page 4 of the linked guidance

http://www.michigan.gov/documents/deq/deq-wb-dwehs-cws-LeadCopperRptConsNotice_294665_7.pdf

Information regarding lead is also included in the City's Annual Consumer Confidence Report (aka Water Quality Report). Below is a link to the City's report covering May – December 2014.

<https://www.cityofflint.com/wp-content/uploads/CCR-2014.pdf>

- Are other Michigan cities using similarly corrosive water? What steps are they taking to protect residents from lead leaching from their home plumbing systems?

The DEQ Office of Drinking Water of Municipal Assistance oversees more than 1,400 community water systems and nearly 10,000 non-community water systems across Michigan. This oversight includes Lead and Copper Rule requirements as part of the Michigan Safe Drinking Water Act. Systems that exceed action level requirements are required to take action in accordance with lead and copper rule requirements as established by EPA and under the primacy granted to MDEQ for this regulation.

- Is Flint conducting compliance monitoring under the Lead and Copper Rule? If so, why have their test results differed from the Virginia Tech findings?

Flint has certified that it is following the requirements of the Lead and Copper Rule. Flint provides customers bottles and instructions for sampling in accordance with these requirements and obtains a signed statement from customers that these instructions were followed (see link below). Samples are analyzed at a certified lab.

http://www.michigan.gov/documents/deq/Lead_Copper_Sampling_Instructions_329915_7.pdf

Virginia Tech has not provided any information to the DEQ regarding its sampling protocols and whether they have followed all requirements of the lead and copper rule.

- What could the city be doing to better educate and protect its residents

The City is already following requirements of the lead and copper rule. However reduction of exposure to lead in drinking water cannot be achieved by regulation alone. Effective elimination of leaded materials in contact with water is a shared responsibility. While the City could undertake a lead service line replacement program, partial lead service line replacement has been shown to exacerbate lead exposure, and many Flint residents are unable to afford replacement of their privately owned portion of the service line.

The DEQ is currently working with the Michigan Department of Health and Human Services to develop a more robust consumer awareness campaign regarding lead exposure through drinking water. We hope the City of Flint will partner with our agencies in this endeavor.

The August "Report of the Lead and Copper Rule Working Group To the National Drinking Water Advisory Council" (attached) discusses an number of other recommendations regarding public education.

Thank you for all of your help. We are really looking forward to having you here next week.

Jumana

~~*<http://flintwaterstudy.org/2015/08/why-is-it-possible-that-flint-river-water-cannot-be-treated-to-meet-federal-standards/>~~

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