

From: [Benzie, Richard \(DEQ\)](#)
To: [Cook, Pat \(DEQ\)](#); [Prysby, Mike \(DEQ\)](#)
Cc: [Busch, Stephen \(DEQ\)](#)
Subject: RE: City of Flint emergency services contractor
Date: Thursday, February 07, 2013 3:57:00 PM

I pretty much agree with Pat except I would expect that the OIC for a distribution system would be providing oversight for the repair/maintenance crews even if they are "contract employees." That may not necessarily mean he's standing over the ditch in every case, but he should be there for major jobs and there should be periodic reviews of procedures and protocols that are being followed in the field. And he is certainly there to answer any questions or deal with unusual circumstances. I would also say that you could make that a point of emphasis in your discussions with the city about contractual services. Either the contractor should have an S-1 operator or they agree to follow city spec's and be subject to unannounced onsite inspections.

From: Cook, Pat (DEQ)
Sent: Thursday, February 07, 2013 2:00 PM
To: Prysby, Mike (DEQ)
Cc: Busch, Stephen (DEQ); Benzie, Richard (DEQ)
Subject: RE: City of Flint emergency services contractor

Hi Mike,

I'm not aware of any large water supplies like Flint that contract with outside companies for main/hydrant repairs and shut-off services. However, you may wish to post this question on the Team Room page to see if any other engineers have experience in this type of arrangement.

I think you raise some valid concerns about outside parties being able to repair breaks, especially about the testing (flushing, disinfection, sampling, etc.) that may be necessary after a main repair. As you know, it's not a one-size fits-all protocol and greatly depends on if the main was repaired under pressure or no pressure.

I don't think we can require the contractors to have licensed operators since the Operator Cert rules of Act 399 only require the OIC and designated backup to be licensed. DWSD has several crews that their only job is to find and repair main leaks/breaks. I'm not 100% sure, but I bet that very few if any one those guys have distro licenses and its highly unlikely that the OIC is providing oversight on each job.

I think we can raise the question to Flint about proving oversight by a city employee/licensed operator when the outside contractor is on site to see what they say, but my guess is that they are going to balk since that will cost them staff time and money.

pat

From: Prysby, Mike (DEQ)
Sent: Wednesday, February 06, 2013 4:22 PM
To: Cook, Pat (DEQ); Benzie, Richard (DEQ); Busch, Stephen (DEQ)
Subject: FW: City of Flint emergency services contractor

I am a bit concerned about the city of Flint considering the idea of privatizing water distribution system repairs. I am not aware of other communities that utilize outside contractors on the scale of systems like Flint. I have a few very small rural communities (ie village of Metamora) who contract with a company (United Water in Metamora's case) to operate and maintain the water system. United Water provides certified contractors. These independent contractors may have some limited ability to conduct emergency repairs but it has been my experience that they contract out watermain repairs. The contract operator's role is to oversee the work to insure that proper procedures are followed (isolation, flushing, disinfection, sampling, notification, etc.).

Back to Flint.....my first take is that any outside vendor who will be conducting emergency services such as repairing broken mains and appurtenances should hold some level of water distribution certification. Although requiring them to hold an S-1 license may be asking too much.....some level of certification makes it more likely that contractor is aware of the proper procedures and the need to protect public health.

Other items:

- Require oversight of repairs by certified Flint water utility operator
- Security issues – vendor must constantly have access to as-built plans, general plan, access to Water Service Center
- Conformance to Flint standard specs – again verified by proper oversight
- Changes the city's focus trying to re-establish a "well-operated" water utility

If you are aware of other utilities of this scale that privatize emergency repairs, please share that with me. Also, if there are other items or concerns that this could raise, feel free to add them. Thanks.

Michael Prysby, P.E.

District Engineer

Office of Drinking Water and Municipal Assistance

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