

Rennaker, Joanne (DEQ)

From: Busch, Stephen (DEQ)
Sent: Monday, November 09, 2015 2:05 PM
To: mglasgow@cityofflint.com
Cc: nhenderson@cityofflint.com; Howard Croft (hcroft@cityofflint.com); Brent Wright (bwright@cityofflint.com); rbincsik@cityofflint.com; Prysby, Mike (DEQ)
Subject: Lead and Copper Rule Compliance Sampling Sites Letter
Attachments: Flint lead serv. ltr.pdf

Please see the attached letter.

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



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

November 9, 2015

Mr. Michael Glasgow
Utilities Administrator
City of Flint
4500 North Dort Highway
Flint, Michigan 48505

WSSN: #2310

Dear Mr. Glasgow:

**SUBJECT: Water Supply – City of Flint (City) – Compliance Communication
Lead and Copper Rule Compliance Sampling Sites**

The City community water system is subject to the requirements of the Michigan Safe Drinking Water Act, 1976 Public Act 399, as amended (Act 399). According to Department of Environmental Quality (DEQ) records, City reports submitted to the DEQ regarding Lead and Copper Rule (LCR) compliance monitoring information have been certified by the City that all LCR compliance monitoring since 1992 has been conducted at sampling sites meeting the Tier 1 criteria listed under subrule 1c of administrative rule 710a (R325.10710a).

The City's recent efforts to electronically convert customer service line information and statements by some of the City's certified operators conflict with the information provided in the City's LCR compliance monitoring certification reports.

Therefore, the DEQ is hereby requesting the City provide additional information and documentation regarding all 324 historic LCR compliance sampling sites.

As of November 3, 2015, the City's electronic database of customer service connections listed 10,895 records of converted customer service connection index cards. The City has recently indicated it has a total of 29,072 customer service connections, leaving approximately 18,177 records left to be converted. These digital records include a listing of the service line material.

The DEQ has obtained a copy of these 10,895 digital records and cross referenced them with the addresses for the City's 324 historic LCR compliance monitoring sites. However, only 46 of the 324 sites were able to be matched at the current time. Of these 46 sites, only 6 sites contained information confirming the Tier 1 site criteria based on having lead service line materials. 14 sites were listed as having no available information (n/a), and require additional documentation to justify being designated as a Tier 1 sample site having a lead service line. The remaining 26 cross referenced sites were listed as having copper service line materials which directly conflicts with the City's LCR reports certifying these sites as Tier 1 based on the criteria of having a lead service line. The City needs to provide additional information to the DEQ demonstrating these sites meet the Tier 1 site criteria or we will assume they do not.

The City's remaining 278 historic LCR compliance sampling sites must also be reviewed and will require additional documentation to justify being designated as Tier 1 sample sites.