

Rennaker, Joanne (DEQ)

From: Busch, Stephen (DEQ)
Sent: Friday, May 08, 2015 11:41 AM
To: Prysby, Mike (DEQ)
Subject: RE: CCCP letter to Flint
Attachments: Visit Ltr - April 2015 -revised.doc

See attached revisions.

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

From: Prysby, Mike (DEQ)
Sent: Thursday, May 07, 2015 3:02 PM
To: Busch, Stephen (DEQ)
Subject: CCCP letter to Flint

Steve,

Attached is a draft letter for your review to the city of Flint regarding their CCCP.

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

May 7, 2015

Mr. Howard Kroft, Director of Public Works
City Of Flint
1101 South Saginaw Street
Flint, MI 48502

WSSN: 02310

Dear Mr. Kroft:

SUBJECT: Flint Cross Connection Control Program

This letter confirms my site visit on April 29, 2015 with Mr. Glen Thomas, Utilities/Cross Connection Division Inspector for the City of Flint. Mr. Stephen Busch from our office was also present. The purpose of the visit, in part, was to discuss the city's Cross Connection Control Program (CCCP).

The City of Flint has made significant progress in recent years regarding the implementation of the City's approved CCCP. This effort has included identification of accounts, inspection and re-inspection of accounts at the approved frequencies, and ensuring the testing of backflow prevention assemblies in accordance with approved frequencies. However, the City's most recent report of annual CCCP activities for 2014 indicates a significant decrease in these activities below minimum requirements, and this deficiency must be address.

Our office fully recognizes the recent staffing loss of the City's previous plumbing inspector and the importance of these plumbing inspection services in providing public health protection, but these activities should not be borne at the cost of the City's CCCP and the protections it provides. Given the bacterial detections that occurred in the City's water distribution system in August and September 2014, along with customer complaints regarding aesthetic water quality, the need for protection through cross connection control are very evident.

We also realize that implementing a CCCP of for a community water system of this magnitude requires a significant commitment of time and personnel. We encourage the city to review CCCP staffing needs and authorize the workforce necessary to comply with the City's approved CCCP requirements.

Should you require further information, please contact me at the telephone number below; via e-mail at prysbym@michigan.gov; or Department of Environmental Quality, P.O. Box 30242, Lansing, Michigan 48909.

Sincerely,

Michael F. Prysby, P.E.
District Engineer
Office of Drinking Water and