

From: [Busch, Stephen \(DEQ\)](#)
 To: [Wurfel, Brad \(DEQ\)](#); [Benzie, Richard \(DEQ\)](#); [Shekter Smith, Liane \(DEQ\)](#)
 Cc: [Pallone, Maggie \(DEQ\)](#); [Wyant, Dan \(DEQ\)](#)
 Subject: RE: here's the interim report
 Date: Thursday, July 09, 2015 5:21:16 PM

Obviously we are not going to comment on an interim draft report.

To address your question from Lindsey, the following text comes from an official memorandum of Benjamin H. Grumbles, Acting Assistant Administrator of EPA at the time, November 23, 2004, to all EPA Regional Administrators Subject: Lead and Copper Rule (LCR) – Clarification of Requirements for Collecting Samples and Calculating Compliance, which in part states:

“The LCR also defines a proper sample as a first draw sample, 1 liter in volume, that is taken after water has been standing in plumbing for at least six hours, and from an interior tap typically used for consumption – cold water kitchen or bathroom sink tap in residences. [40 CFR 141.86(b)(2)] There is no outer limit on standing time.”

While it indicates there is no outer limit on standing time, the only requirement is that it be at least those six hours. This was also incorporated into the 2007 LCR minor revisions.

See link below (note the final question at the bottom of the page on long term revisions the response for which includes “broader revisions to monitoring”)

http://water.epa.gov/lawsregs/rulesregs/sdwa/lcr/fs_lcr_2007_final.cfm

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

From: Wurfel, Brad (DEQ)
 Sent: Thursday, July 09, 2015 4:54 PM
 To: Busch, Stephen (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ)
 Cc: Pallone, Maggie (DEQ); Wyant, Dan (DEQ)
 Subject: FW: here's the interim report

Steve,

The ACLU has saved us the trouble of waiting on EPA for the report ... it's online at the link below.

Lindsey Smith at Mi Public Radio picked up the story from Josh. Her inquiry has to do with EPA's Miguel making an assertion that we (DEQ) encourage people to flush their pipes before taking a water sample ... which is the opposite of what you described to me as the protocol. Miguel apparently asserts that the DEQ and EPA are at odds on proper protocol. Which seems weird.

Let's discuss. Thanks!

b

From: Lindsey Smith [<mailto:lmsmi@umich.edu>]
Sent: Thursday, July 09, 2015 4:48 PM
To: Wurfel, Brad (DEQ)
Subject: here's the interim report

<http://www.aclumich.org/sites/default/files/file/EPAWaterReport062415.pdf>

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Lindsey Smith
West Michigan Reporter
Michigan Radio
Office (616) 551-0717
michiganradio.org