

From: [Busch, Stephen \(DEQ\)](#)
To: [Wurfel, Brad \(DEQ\)](#)
Cc: [Shekter Smith, Liane \(DEQ\)](#)
Subject: Response to Questions from 8/4 Meeting on Flint
Date: Monday, August 10, 2015 1:24:19 PM

Brad,

Here is what I have been able to gather in response to the questions from our meeting with members of the Flint community at the Governor's Office on Tuesday August 4th.

Why Are There Different 2014 Consumer Confidence Reports for City of Flint Water System?

The City of Flint issued two separate Consumer Confidence Reports (CCR's) in 2015 covering the water quality data from 2014.

One report for the period of January – April 2014 when the City was obtaining water from Detroit (DWSD).

A second report for the period April – December 2014 when the City was using the Flint River and its own Water Treatment Plant.

The CCR for DWSD water was mailed to customers in June. The Flint River based CCR was mailed to customers in mid-July, delayed due to issues with the printing contractor. We will work with the City to ensure both reports are posted to the City's website and both are made available when requested by customers. Should the City choose to create separate CCR's during the year that the City of Flint connects to the Karegnondi Water Authority we will work with the City to provide more clarity and try to have all material included in a single mailing.

The DWSD based CCR is the one community members had at the meeting, while the DEQ had brought a copy of the Flint River based CCR. As separate sampling was done under each source, this explains the discrepancy in the values and monitoring periods being reported in the respective CCR's.

Why Were Some Samples Not Included In The Flint Lead and Copper Monitoring January – June 2015 Period, and Are Sampled Customers Being Provided Their Results?

The City has confirmed that all lead and copper samples collected through the City, whether routine sites or customer requests, were sent to the State of Michigan lab for analysis. Individual sample results are provided to the property owner within 30 days of receiving the lab results in accordance with the Michigan Safe Drinking Water Act (Public Act 399, 1976 Administrative Rule 410(5)).

Results of any lead and copper samples collected by EPA staff were not provided to the City of Flint or Michigan Department of Environmental Quality. It is also unclear whether any such samples would meet the sample site and collection protocol requirements of the Safe Drinking Water Act to be used for compliance determination during this monitoring period.

The lead 90th percentile calculation of 11 parts per billion is based on 69 samples that met the

appropriate sampling location site criteria, and met the sample collection site and collection protocol requirements of the Safe Drinking Water Act for this monitoring period. A minimum of 60 samples were required for this monitoring period. As indicated during the meeting, the City's sampling for lead complies with the Action Level standard of 15 parts per billion, but based on the population served the City and these results, the City will need to make a recommendation to the MDEQ on how they will fully optimize their corrosion control treatment. These next steps continue to follow the requirements of the Lead and Copper Rule.

Why Was Sampling From 212 Browning Avenue For Lead and Copper Not Included For Compliance?

The residence at 212 Browning Avenue utilizes a whole home filter. As stated in the Michigan Safe Drinking Water Act (Public Act 399, 1976 Administrative Rule 710a, Lead and Copper in tap water; monitoring requirements) "Sampling sites may not include faucets that have point of use or point of entry treatment devices designed to remove inorganic contaminants." Such treatment alters the water chemistry and water quality such that it is no longer representative of public water from the City's distribution system. Therefore, it cannot be used to determine public water system compliance with the action level standard.

An additional concern regarding water quality conditions at this residence is that the City of Flint has no record of a plumbing permit being obtained when the home was fully re-plumbed. Thus any plumbing work completed was not inspected and cannot be determined to comply with requirements of the Michigan Plumbing Code and Michigan Residential Code. As a result there may be conditions within the household that are contributing to some of the water quality issues experienced by the owner.

What Are The pH Conditions In The City's Water? Concerns over low, 4-5 pH values

Since late April 2014 – June 2015, the following pH conditions have been reported by the City. Water Treatment Plant – Finished Water plant tap pH range = 7.07 minimum to 9.9 maximum, overall average 7.7, measured daily. The 9.9 is a one-time anomaly from softening treatment.

Distribution System – Water Quality Parameters 25 sample sites location throughout monitored quarterly

July – Sept. 2014 pH 7.71 average, range 7.56 – 7.86

Oct. – Dec. 2014 pH 7.88 average, range 7.62 – 8.10

Jan. – March 2015 pH 7.81 average, range 7.60 – 7.99

April – June 2015 pH

I believe this addresses questions from the meeting directed to the MDEQ.

I did want to add that the DEQ Office of Drinking Water and Municipal Assistance has been in contact with the Department of Health and Human Services, Environmental Health Division, Healthy Homes Section and had some preliminary discussions about a public education and assistance campaign regarding household lead issues, guidance and abatement.