

Rennaker, Joanne (DEQ)

From: Prysby, Mike (DEQ)
Sent: Monday, October 19, 2015 1:16 PM
To: Krisztian, George (DEQ)
Cc: Busch, Stephen (DEQ)
Subject: Deliberative and Preliminary: FW: Flint WTP PH2 SEG4 - Corrosion Control

George,

I am forwarding you EPA's comments regarding Flint's corrosion control proposal. They are suggesting a significantly higher dosage and a residential testing program to gain a better understanding on the effectiveness of the orthophosphate against corrosion of lead. Further assistance will likely be needed regarding this corrosion control proposal. Steve and I will be available to discuss this issue with you later this afternoon.

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

From: Lytle, Darren [mailto:Lytle.Darren@epa.gov]
Sent: Monday, October 19, 2015 12:05 PM
To: Prysby, Mike (DEQ)
Cc: Schock, Michael; Kempic, Jeffrey; Busch, Stephen (DEQ)
Subject: RE: Flint WTP PH2 SEG4 - Corrosion Control

Mike,

Thank-you for giving us the opportunity to review the city of Flint's corrosion control plan.

We believe it is necessary that Flint boosts orthophosphate dosage. Given that the distribution system has not received orthophosphate in over a year, we expect that orthophosphate will need to be boosted to 1) meet the demand of the distribution system, 2) reach the service lines and other lead-containing components in premise plumbing, and 3) accelerate lead reduction at the consumer's taps. Orthophosphate should preferably be added in the same form as the Detroit source which is phosphoric acid from our understanding. This is the proposed case here, however, a simple test should be performed to make sure that the pH is not impacted in a significant way at the desired target dose.

We have not been able to obtain comprehensive water quality data for the finished water characteristics of the Detroit water that will be fed to Flint, to assess ranges of major chemical characteristic fluctuations. However, based upon the email trail, Detroit water entering the Flint system appears to only contain around 0.4 PO₄/L. This concentration range is entirely too low compared to that needed in studies presented and published in the last 20+ years that have focused on lead released directly from lead pipes, and the solubility of the most likely lead orthophosphate pipes scales. We also strongly feel that targeted dose of 0.8 mg PO₄/L is also too low, for the very same reason. We would be glad to share with you numerous standard corrosion control and treatment reference works, best practices guides and published results from US and international lead corrosion control field and pilot studies. Secondly, the basis for that target (other communities using Lake Huron source use the same dose) is not scientifically derived nor does it consider water quality

and the current state of Flint's distribution system. We have reviewed the original Detroit corrosion study and have seen some of the LCR monitoring data, and besides the fact that it did not directly pertain to this water source, few dosages were tested in the cited 1994 pipe loop study, and the higher dosage than the one implemented in the field currently was more effective. Based on the limited amount of data on the quality of Detroit water, what we know about the history of Detroit corrosion control, we think an orthophosphate residual of 3 to 4 mg PO₄/L should be the minimum starting test target residual for pipe passivation. It is likely that, at least initially a higher dosage will be necessary to reach the far ends of the distribution system and sufficiently reduce lead solubility and release from all lead sources. To allow flexibility, we feel the design of the chemical feed and storage systems should be able to consistently deliver a maximum dose of 5 to 6 mg PO₄/L, if substantial orthophosphate loss is observed, if the starting dose is set for the desired residual level of 3 to 4 mg/L as PO₄. We suggest that jar tests be performed in advance of orthophosphate addition to Detroit water to evaluate the impact of orthophosphate dose on turbidity that could result from interactions between orthophosphate and background Detroit water quality parameters (e.g., aluminum, calcium, etc.).

We want to stress that immediately shifting to Detroit water and adding orthophosphate will not necessarily translate to immediate improvements. Furthermore, this is a change, albeit a return to past conditions. Nonetheless, a period of system upset should be anticipated. The need for a communication strategy and a distribution system plan are critical.

Lastly, we see no mention of a water quality monitoring program. Two programs need to be put in place immediately (before return to Detroit water) to 1) identify lead sources, 2) assess treatment effectiveness against lead release from all of the simultaneously operating mechanisms (solubility, particulate release, galvanic corrosion), and 3) assess orthophosphate levels and stability of water quality in the distribution system.

There are multiple sources of lead in the Flint distribution system to the consumers' taps, such as: pipes; leaded brass; leaded solder; accumulations on old galvanized steel pipes; possibly accumulated on copper or some plastic pipes. It is critical that the fate of orthophosphate in the distribution system is understood, and how effective it is against each type of lead source, so dosing adjustment can be properly made. For this purpose, we recommend that a number of residences throughout Flint that meet the following plumbing criteria, be identified for an assessment of the contribution lead from the different potential service line and interior plumbing sources, through detailed mapping of plumbing materials, lengths, sizes, and location and type of inline devices and faucets using profile sampling. For confidence in interpretation, probably at least 5 sites from each of the configurations will be necessary. The configurations we would estimate to be most important (but should be changed or added to if local construction practice indicates it's necessary): Lead service line, galvanized steel interior plumbing; lead service line, copper with leaded solder joints; lead service line, plastic interior plumbing. It is also possible that interior plumbing may differ from the material used for the customer-side service line segment. We would be glad to discuss the specifics of this sampling effort.

For the purpose of assessing stability of water quality in the distribution system and to inform on orthophosphate residual adjustment, we suggest that 8 to 10 locations in the distribution system be selected to measure pH, alkalinity, orthophosphate, turbidity and iron on a weekly basis. These could be collected from TCR sampling locations, or other readily-accessible buildings, should be located at a distribution of locations in the distribution system and should be collected after a flush sufficiently long to assure that "fresh" distribution system water is being measured. Research has shown that over time, orthophosphate can reduce disinfectant demand associated with corroding metallic distribution system materials. These measurements need to be performed in the field and can simply be done with a portable HACH test kit or spectrophotometer.

A lead sampling plan needs to be in place to assess the effectiveness of water change and treatment boost. LCR monitoring sites with confirmed lead service lines can be in the sampling pool. Sampling should consist of a 1 liter first draw sample (LCR sample without 5 minute pre-flush), followed by an additional flushed sample or two depending on profile sample results which is intended to capture major lead source(s). The specific details of this effort need to be worked out by the technical committee as soon as possible. We would gladly work with Flint on establishing a water sampling program to identify and verify lead service line sites. The plan and initial sampling effort should be performed before the switch so that one baseline sample set is collected.