

Feuerstein, Heather (DEQ)

From: Wurfel, Brad (DEQ)
Sent: Monday, September 28, 2015 3:34 PM
To: Feuerstein, Heather (DEQ)
Subject: FW: question about optimal WQP ranges for Flint's water

From: Yanna Lambrinidou [mailto:pnalternatives@yahoo.com]
Sent: Monday, September 28, 2015 12:30 PM
To: Busch, Stephen (DEQ)
Cc: Benzie, Richard (DEQ); Cook, Pat (DEQ); Prysby, Mike (DEQ); Wurfel, Brad (DEQ); hyde.tinka@epa.gov
Subject: Re: question about optimal WQP ranges for Flint's water

Dear Mr. Busch,

I appreciate your response.

Would you be able to send me a copy of the modified consecutive system approach to lead and copper monitoring that EPA approved?

I am sorry I cannot route my question through the NDWAC or my WG. I am not a NDWAC member, and my WG disbanded when our final report was completed back in August. I apologize if I have caused any confusion. The questions I am posing come solely from me because I am in the process of writing a dissenting opinion about the NDWAC LCR WG recommendations that is due to EPA in a couple of weeks. One of the main reasons I am writing this opinion is because of concerns I have about the LCR's CCT requirement. Your experience with and implementation of the LCR in Flint is extremely helpful to me in deepening my understanding about the LCR's CCT requirement and will undoubtedly allow me to write a more informed discussion.

I thank you in advance for your help on this matter and your support of ongoing efforts to assess the LCR carefully and thoroughly.

Kindly,

Yanna Lambrinidou

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From: "Busch, Stephen (DEQ)" <BUSCHS@michigan.gov>
To: Yanna Lambrinidou <pnalternatives@yahoo.com>
Cc: "Benzie, Richard (DEQ)" <BENZIER@michigan.gov>; "Cook, Pat (DEQ)" <COOKP@michigan.gov>; "Prysby, Mike (DEQ)" <PRYSBYM@michigan.gov>; "Wurfel, Brad (DEQ)" <WurfelB@michigan.gov>; "hyde.tinka@epa.gov" <hyde.tinka@epa.gov>
Sent: Friday, September 25, 2015 8:26 AM
Subject: RE: question about optimal WQP ranges for Flint's water

Dr. Lambrinidou,

I'm sorry for the delay in my response. As some of your questions relate more to statewide program implementation I have requested assistance with the response from staff within our central program office. However, these staff were attending and participating in an offsite (American Water Works Association Conference Michigan Section) conference last week.

Michigan has implemented an EPA approved modified consecutive system approach to lead and copper monitoring where a wholesale water supply sells water to other community water systems. In addition, while water quality parameter (WQP) monitoring occurs at both the water treatment plant and in the combined distribution system, a WQP range is only required to be established at the water treatment plant tap after the system has demonstrated optimized corrosion control treatment (OCCT).

Thus when the City of Flint was a customer of the Detroit Water and Sewerage Department (DWSD), the City of Flint participated in WQP monitoring of its distribution system, but ranges were established only for the OCCT at DWSD treatment plants. The attached letter from our Department established the minimum levels for pH and phosphate dosage in 2000.

As the City of Flint water treatment plant has not yet installed such treatment or been given the designation of OCCT these plant tap values have not been established.

However, the City of Flint WTP has continued to maintain the minimum pH value requirement previously established for DWSD

As noted in your Working Group Report to the NDWAC, "Corrosion Control Treatment (CCT) involves the addition of chemicals (e.g. orthophosphates or silicate) to create a barrier between the pipes and the drinking water, or to modify drinking water chemistry (such as pH and hardness) to inhibit the potential for corrosion."

Should you consider the Flint WTP softening process to be OCCT, then the City already continues to comply with the OCCT requirements as the City of Flint has never had 10% or more of compliance tap samples exceed the 15 ppb action level. Even prior to DWSD's established OCCT the City of Flint lead compliance monitoring has never exceeded the 15 ppb action level.

If you have additional questions we would appreciate having them routed through the NDWAC and your Working Group. Thanks.

Stephen Busch, P.E.
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From: Yanna Lambrinidou [<mailto:pnalternatives@yahoo.com>]
Sent: Wednesday, September 16, 2015 7:22 PM
To: Busch, Stephen (DEQ); Wurfel, Brad (DEQ)
Subject: Re: question about optimal WQP ranges for Flint's water

Dear Mr. Busch,

Thank you for your quick response. I appreciate the information at, I am sure, a very busy time for you and MDEQ.

Could you please help me understand the following?