
From: Shekter Smith, Liane (DEQ)
Sent: Monday, November 23, 2015 1:15 PM
To: Philip, Kris (DEQ); Shekter, Jean (DEQ); Benzie, Richard (DEQ)
Cc: Devereaux, Tracy Jo (DEQ)
Subject: FW: Flint Task Force Comments on MDEQ Residential Sampling Instructions
Attachments: Task Force Comments on MDEQ Residential Sampling Instructions 11-20-15.pdf; ATT00001.htm

FYI – we'll need to address these comments in the document that we were reviewing this morning.

From: Sygo, Jim (DEQ)
Sent: Monday, November 23, 2015 1:06 PM
To: Shekter Smith, Liane (DEQ); Busch, Stephen (DEQ); Prysby, Mike (DEQ)
Subject: Fwd: Flint Task Force Comments on MDEQ Residential Sampling Instructions

EPA comments for tomorrow's phone call.

Sent from my iPhone

Begin forwarded message:

From: "Kaplan, Robert" <kaplan.robert@epa.gov>
Date: November 23, 2015 at 12:40:59 PM EST
To: "Sygo, Jim (DEQ)" <Sygoj@michigan.gov>
Subject: Flint Task Force Comments on MDEQ Residential Sampling Instructions

Jim,

Thanks for the opportunity to comment on the MDEQ Flint Residential Sampling Instructions. Attached please find the Task Force comments.

- Bob

Flint Drinking Water Task Force (FTF 15-2)

Task Force Comments on Flint's Residential Drinking Water Lead & Copper Sampling Instructions

EPA received the draft of Flint's Residential "Drinking Water Lead & Copper Sampling Instructions" for comment from Jim Sygo, MDEQ, on November 13, 2015. Below are comments from EPA's Flint Safe Drinking Water Task Force.

General

It should be clearly stated that these sampling instructions are for LCR compliance monitoring – from now on without the pre-flushing.

Specific Comments

1. The Task Force agrees with the removal of pre-flushing.
2. In the "Dear Resident" cover paragraph, we suggest changing the text "...provide a more accurate gauge of the amount of lead exposure...", because though this is a much better representation of the water intended to be captured by the LCR, it DOES NOT REPRESENT EXPOSURE. We suggest: "The new method is designed to provide a more accurate gauge of lead levels at the tap under normal household use using the current regulatory sampling requirements." We recommend that when the residents are sent their results, that it includes an explanation that the result does not represent lead exposure and that first draw samples have been found to underestimate lead levels in direct contact with a lead service line. It is recommended that customers continue to use the water filters that have been provided to minimize lead exposure.
3. Item 1 needs to require that samples be unfiltered/untreated. Samples may be taken from either a kitchen or bathroom faucet commonly used for drinking, provided the faucet used has no filter attached or the filter has been bypassed. Instructions need to be provided on how to bypass the faucet mount filters that have been distributed. Other home treatment devices must be bypassed too. If the resident has questions about how to bypass a treatment device, they should call the water supply.

Depending on which Flint and MDEQ feel would be more easily understood by residents, the following are two potential alternatives to current Item 1 that would ensure only untreated/unfiltered samples are collected:

Alternative 1

Select an unfiltered/untreated faucet in the KITCHEN or BATHROOM that is commonly used for drinking. DO NOT use a faucet that has a filter attached to it unless you bypass the filter. DO NOT use a faucet that is connected to a home water treatment device (like a water softener, iron filter, reverse osmosis) unless you bypass the home water treatment device. DO NOT sample from a laundry sink or a hose spigot as these samples cannot be used by your utility.