
From: Busch, Stephen (DEQ)
Sent: Monday, April 27, 2015 8:27 AM
To: Cook, Pat (DEQ)
Cc: Prysby, Mike (DEQ)
Subject: RE: Flint Corrosion Control?

He continues to base his concern on a single location which has/had a lead service line and "pre-flushing" concerns which are not part of the current regulations.

Flint is now below the criteria for a large system. Technically they don't have to do any of this.

Flint has also only been through one round of lead copper sample not the two rounds needed to make the determination he lists below.

If he continues to persist we may need Liane or Director Wyant to make a call to EPA to help address his over-reaches.
 Stephen Busch, P.E.

Lansing and Jackson District Supervisor
 Office of Drinking Water and Municipal Assistance
 MDEQ
 517-643-2314

From: Cook, Pat (DEQ)
Sent: Monday, April 27, 2015 7:59 AM
To: Busch, Stephen (DEQ)
Cc: Prysby, Mike (DEQ)
Subject: FW: Flint Corrosion Control?

Hi Steve and Mike - I knew this was going to happen. Miguel is questioning that Flint is in compliance with optimal corrosion control. Please read the below email and let me know what you think. While it's not a big hurry at this time since Miguel is out till next week, we eventually will have to respond to him.
 pat

From: Deltoral, Miguel [<mailto:deltoral.miguel@epa.gov>]
Sent: Saturday, April 25, 2015 10:11 AM
To: Cook, Pat (DEQ)
Cc: Porter, Andrea; Crooks, Jennifer; Poy, Thomas
Subject: Re: Flint Corrosion Control?

Hi Pat,

I'll be heading out to MI for RTCR tomorrow and won't see email until next Tuesday, but I wanted to follow up on this because Flint has essentially not been using any corrosion control treatment since April 30, 2014 and they have LSLs. Given the very high lead levels found at one home and the pre-flushing happening at Flint, I'm worried that the whole town may have much higher lead levels than the compliance results indicated, since they are using pre-flushing ahead of their compliance sampling.

If the source water lead is non-detect (zero), then according to 141.89(a)(3) they should use zero for that source water value:

"All lead and copper levels measured between the PQL and MDL must be either reported as measured or they can be reported as one-half the PQL specified for lead and copper in paragraph (a)(1)(ii) of this section. **All levels below the lead and copper MDLs must be reported as zero.**"

As far as the treatment determination, there are only two scenarios for a large system to be deemed to have optimized corrosion control without treatment and Flint does not appear to meet either:

The first is at 141.81(b)(3)

Any water system is deemed to have optimized corrosion control if it submits results of tap water monitoring conducted in accordance with § 141.86 and source water monitoring conducted in accordance with § 141.88 that demonstrates for two consecutive 6-month monitoring periods that the difference between the 90th percentile tap water lead level computed under § 141.86(a)(7) and the highest source water lead concentration is less than the Practical Quantitation Level for lead specified in § 141.89(a)(1)(ii).

If Flint's highest source water lead was zero, and their 90th percentile was 0.006, then Flint does not meet this criteria, because the difference must be LESS THAN the PQL (i.e., 0.004 or less). $0.006 - 0 = 0.006$.

The second is at 141.81(b)(3)(i):

Those systems whose highest source water lead level is below the Method Detection Limit may also be deemed to have optimized corrosion control under this paragraph if the 90th percentile tap water lead level is less than or equal to the Practical Quantitation Level for lead for two consecutive 6-month monitoring periods.

Although Flint's source water lead was non-detect (zero), the 90th percentile lead level is 0.006 which is above the PQL of 0.005, so Flint would not meet this criteria either.

Am I missing something?

Miguel A. Del Toral
Regulations Manager
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Chicago, IL 60604
Phone: (312) 886-5253

From: Cook, Pat (DEQ) <COOKP@michigan.gov>

Sent: Friday, April 24, 2015 12:45 PM

To: Deltoral, Miguel

Subject: RE: Flint Corrosion Control?

Total Lead collected from the plant tap on 5/22/14 was zero.
pat

From: Deltoral, Miguel [mailto:deltoral.miguel@epa.gov]

Sent: Friday, April 24, 2015 11:59 AM

To: Cook, Pat (DEQ)

Cc: Poy, Thomas; Porter, Andrea

Subject: Re: Flint Corrosion Control?

What was the source water lead level?

Miguel A. Del Toral
Regulations Manager
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77 West Jackson Blvd, (WG-15J)
Chicago, IL 60604
Phone: (312) 886-5253

From: Cook, Pat (DEQ) <COOKP@michigan.gov>

Sent: Friday, April 24, 2015 10:43 AM

To: Deltoral, Miguel

Cc: Poy, Thomas; Porter, Andrea

Subject: RE: Flint Corrosion Control?

Hi Miguel - Flint is currently not practicing corrosion control treatment at the WTP. When they started treating water at their WTP last spring, we placed them on full chart (100 sites) Pb/Cu monitoring for two consecutive 6 month periods. WQ monitoring is also being conducted. The first round of samples after switch-over from DWSD (July 1, 2014 – Dec 31, 2014) had 90th percentiles of 6 ppb for Lead and 110 ppb for Copper. The