
From: Prysby, Mike (DEQ) <PRYSBYM@michigan.gov>
Sent: Tuesday, May 19, 2015 3:36 PM
To: Jeff Hansen
Subject: Flint OEL - MDEQ Comments
Attachments: March 1st, 2015 OEL Report - DEQ Comments.doc

Jeff,

In looking at some of the Flint TTHM material for tomorrow's TAC meeting.....I noted our March 1, 2015 comments pertaining to the most recent Operation Evaluation Report prepared for Flint. I didn't see an electronic "sent date" to you on this document. It may be that I hand delivered our comments to LAN during our first TAC meeting on March 4th. If not, attached are our comments and I apologize in the delay. These comments can be addressed in the next report due on May 29, 2015.

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**City of Flint
Operational Evaluation Report
March 1, 2015
MDEQ Comments**

1. Revise Tables 2 and 3 on Page 7 to account for proper alignment of DDBP samples (results, location, site code). Also, revise statement on Page 1 regarding the number of sites exceeding the TTHM MCL following the 4th quarter sample cycle.
2. The ozone system was recently repaired. (Page 10 & 19). What is the ozone system's current production rate?
3. The city's hydraulic model (prepared by Potter Consulting) is being updated (Page 16). Is the model currently sufficient in determining proper sizing for the transmission main replacement in DuPont & Bishop Street corridor? (currently sized at 24-inch) (Pages 5, 16, and 20)
4. Are the potassium permanganate results & conclusions available? (Pages 4 and 17)
5. We agree that some reduction in storage volume could be achieved without compromising reliability; however given high usage, main breaks, and "let runs" during the winter, storage volume remains important. We agree with the need to determine adequate storage volume which will likely differ between summer and winter. (Page 15)
6. We agree with the concern of re-circulation of water pumped from the booster pump stations; however, we were recently informed of existing distribution system check valves to prevent recirculation. These appurtenances and their condition need to be confirmed. The hydraulic model may also need to be updated to include these valves. (Page 15)
7. We concur with the recommendation to provide the ability to monitor raw water TOC and PTAP TTHM. (Pages 17 & 18)
8. Page 20 provides 2 options to manage water age and each option includes reducing the utilized storage volume of the 3 MGAL well to 2 MGAL. The reduction in storage volume limits the WTP's ability to meet CT under worst case conditions (low temp, high pH, 30 MGD pumping rate from reservoir).
9. Table 11 on Page 21 outlines an Action Plan for Stage 1 and Stage 2 actions. Several actions listed in Stage 2 including; repair of ozone system, continued valve replacement, and replacement of deteriorated watermain are longer term solutions; however, they need to proceed regardless of the outcome of TTHM reduction.