
From: Busch, Stephen (DEQ)
Sent: Friday, May 01, 2015 11:34 AM
To: Cook, Pat (DEQ)
Subject: RE: Flint Corrosion Control?

Here is the revised version.

Hi Miguel - sorry, I should have been more specific in my previous email. The rules you stated below allow large systems to be considered having optimal corrosion control if they have data from two consecutive 6 month monitoring periods that meet specific criteria. DEQ-ODWMA has not made a formal decision as to whether or not the City of Flint meets the exemption criteria or will be required to do a corrosion control study since Flint has only completed one round of 6 month monitoring. The City of Flint's second round of monitoring will be completed by June 30, 2015, and we will make a formal decision at that time. This is consistent with the process followed in the early 1990's for large systems when the Pb/Cu rule was first implemented. The Department waits until large systems complete both rounds of full scale, 6 month monitoring before making a decision about optimal corrosion control. If it is determined that Flint has to install corrosion control treatment, the rule allows up to 2 years to complete a study and 2 additional years to install the treatment unless we set a shorter time frame.

As Flint will be switching raw water sources in a just over one year from now, raw water quality will be completely different than what they currently use. Requiring a study at the current time will be of little to no value in the long term control of these chronic contaminants.

Finally, the City of Flint's sampling protocols for lead and copper monitoring comply with all current state and federal requirements. Any required modifications will be implemented at the time when such future regulatory requirements take effect.

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Office of Drinking Water and Municipal Assistance
MDEQ
517-643-2314

From: Cook, Pat (DEQ)
Sent: Friday, May 01, 2015 10:58 AM
To: Busch, Stephen (DEQ)
Subject: FW: Flint Corrosion Control?

Steve – how does this look? Please add anything you want and return to me before I send it to Miguel.

Hi Miguel - sorry, I should have been more specific in my previous email. The rules you stated below allow large systems to be considered having optimal corrosion control if they have data from two consecutive 6 month monitoring periods that meet specific criteria. Since Flint has only completed one round of 6 month monitoring, we have not made a formal decision as to whether or not they meet the exemption criteria or if they need to do a corrosion control study. Their second round of monitoring will be completed soon and we will make a formal decision at that time. This is similar to the process we followed in the early 1990's when the Pb/Cu rule was first implemented. We waited until large systems completed both rounds of full scale, 6 month monitoring before we made a decision about optimal corrosion control. If we tell Flint they have to install

corrosion control treatment, the rule allows up to 2 years to complete a study and 2 years to install the treatment unless we set a shorter time frame.

Another thing to consider is that Flint will be switching raw water sources in a little over a year. If we require a study, is it wise to tell them to do one when the raw water quality will be completely different than what they currently use? It's something to think about.

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 § 141.80(c)(3), 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). $0.006 - 0 = 0.006$.