
From: Kaplan, Robert <kaplan.robert@epa.gov>
Sent: Friday, October 30, 2015 4:26 PM
To: Sygo, Jim (DEQ)
Subject: EPA Task Force comments on letter sending Flint Corrosion Control Permit
Attachments: Draft Flint CCT operation letter tpedit.docx

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Jim,

On behalf of the Task Force, thank you for sending us the corrosion control plan letter this morning for our review. Attached please find EPA's edits to that letter. We also understand that MDEQ will issue an amended permit shortly to take account of the Task Force's comments sent to you today.

EPA encourages the City to take advantage of our offer for analytical support as our laboratory can analyze for a more robust set of parameters. The presence or absence of these additional parameters has provided valuable information and insights in past efforts on identifying potential sources of lead.

The Task Force believes Flint should implement the additional corrosion control treatment as soon as possible. The letter and amended permit are an important step in making sure additional corrosion control takes place quickly and appropriately.

- Bob

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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 30, 2015

Mr. Mike Glasgow
Utilities Administrator
City of Flint
4500 North Dort Highway
Flint, Michigan 48505

Dear Mr. Glasgow:

SUBJECT: Water Supply – City of Flint (City) – Corrosion Control Treatment Operation

The purpose of this letter is to outline additional requirements and recommendations regarding the additional corrosion control treatment measures being taken by the City water system.

The City has been purchasing drinking water from the Detroit Water and Sewerage Department (DWSD)/Great Lakes Water Authority (GLWA) since Friday, October 16, 2015. DWSD/GLWA provides corrosion control treatment to its water and DWSD/GLWA has been deemed by the Michigan Department of Environmental Quality (MDEQ) to have fully optimized corrosion control treatment. This optimization requires DWSD/GLWA to provide orthophosphate addition, maintain a minimum dose of 0.9 milligrams per liter (mg/L) as PO_4 , and maintain a DWSD/GLWA plant tap residual of 0.8 mg/L as PO_4 . As part of its optimization, DWSD/GLWA is also required to maintain a minimum pH of 7.0 at the DWSD/GLWA plant tap.

Corrosion Control Treatment and Operation

To further enhance pipe passivation in the City water distribution system, customer service lines, and customer plumbing, **the City shall dose additional orthophosphate to increase distribution system phosphate residual to a minimum of 3.1 mg/L as PO_4 (1.0 mg/L as P).** The City has obtained a Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 399), water system construction permit for the installation of this treatment equipment at Control Station 2 and Pump Station 4, construction permit number W151104, issued on October 28, 2015.

The City should also maintain a minimum pH level of 7.0 throughout the City's water distribution system. If pH levels of 7.0 or less are detected, the City shall immediately notify the MDEQ.

As part of the City water system operations, the City shall conduct:

- **Daily monitoring of incoming DWSD/GLWA water for pH and for orthophosphate residual, as PO_4**
- **Daily monitoring of additional orthophosphate dosage, as PO_4**
- **Daily monitoring of water entering the City distribution system for pH and for orthophosphate residual, as PO_4**