
From: Cook, Pat (DEQ)
Sent: Tuesday, April 28, 2015 9:09 AM
To: Benzie, Richard (DEQ); Philip, Kris (DEQ)
Cc: Busch, Stephen (DEQ)
Subject: FW: Flint Corrosion Control?

I think you should be aware of this. Steve and I will respond to Miguel later in the week regarding his 4-25-15 email.

pat

From: Cook, Pat (DEQ)
Sent: Monday, April 27, 2015 9:35 AM
To: Busch, Stephen (DEQ)
Cc: Prysby, Mike (DEQ)
Subject: RE: Flint Corrosion Control?

Hi Steve – I agree, the constant second guessing of how we interpret and implement our rules is getting tiresome. I think what Miguel is saying is that since Flint did not comply with "optimal" criteria stated below (Rule 604(f)(2)(b)(D)(iii) in Act 399) in the first 6 month monitoring period, they cannot meet it for two consecutive 6 month periods that is required. However, we have always waited for 2 rounds of results before making that decision.

Any ways, when you have a minute please give me a call so we can figure out how to respond to Miguel.

Patrick Cook, P.E.
 Community Drinking Water Unit
 Office of Drinking Water & Municipal Assistance
 Michigan Department of Environmental Quality
 Phone: (517) 284-6514
cookp@michigan.gov

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 Lane 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