

where lead results were not always being included in compliance calculations and subsequently, invalidation of samples was becoming more difficult. In order to avoid that complicated process, we devised our current recommendations for ensuring appropriate but not excessive stagnation for LCR monitoring.

We continue to believe it is appropriate to flush these taps the day before sample collection to simulate and/or ensure typical household use before the tap is allowed to sit overnight to achieve the expected stagnation time the regulation stipulates (~8 hours) prior to collecting the first draw sample. The LCR does not say the result should represent the "absolute worst case" condition – it talks about sampling the highest risk locations (lead plumbing, lead service lines, high lead content solder piping, etc.) after overnight stagnation and then collecting a first draw sample so as not to flush elevated lead from that tap at that point in time. Until EPA changes this rule, we are satisfied with our sampling protocol.

I am leaving now, so you can use this information as you see fit, or wait until tomorrow to discuss with Steve, Liane, Pat and me. We have an all-day ODWMA managers meeting starting at 9 AM Thursday, although Liane is also attending a meeting first thing in the morning with Jim Sygo, Bob Wagner and Jon Allen.

Richard

From: Wurfel, Brad (DEQ)
Sent: Wednesday, September 09, 2015 4:52 PM
To: Busch, Stephen (DEQ); Benzie, Richard (DEQ); Shekter Smith, Liane (DEQ); Prysby, Mike (DEQ)
Subject: FW: june 24 memorandum

Heads up
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From: Ronald Fonger [<mailto:RFONGER1@mlive.com>]
Sent: Wednesday, September 09, 2015 1:28 PM
To: Wurfel, Brad (DEQ)
Subject: june 24 memorandum

Brad:

I know you said the state would not comment on unofficial draft reports from U.S. EPA staff, but since the attached June 24 memorandum was sent to four DEQ staff members, can you comment about what – if anything – the state has done in response?

Was the city of Flint notified of the issues raised in the memorandum directly by DEQ?

Was there a written response from DEQ to U.S. EPA to the memo?

Thanks, we are looking further into some of the issues raised in this document.

Ron Fonger
MLive Media Group
Reporter

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