

From: Busch, Stephen (DEQ)

Sent: Friday, July 24, 2015 3:46 PM

To: Wurfel, Brad (DEQ)

Cc: Shekter Smith, Liane (DEQ); Wyant, Dan (DEQ); Pallone, Maggie (DEQ); Prysby, Mike (DEQ); Benzie, Richard (DEQ)

Subject: RE: Need update on lead / copper tests for Flint

Brad,

As we discussed, the City has completed the last round of monitoring (Jan 1 – June 30, 2015). The last samples came in about a week ago. We have made the compliance determination that the 90th percentile level is 11 parts per billion, which is below the Action Level Standard of 15 parts per billion (there is no Lead maximum contaminant level standard). The federal rule requires measuring lead levels in water from household plumbing materials to determine the corrosivity of the City's water in order to limit exposure.

I have provided a summary of Flint's lead compliance monitoring from the last 20+ years since this regulation started in 1991. The City of Flint itself has never had a 90th percentile level exceed the 15 part per billion action level. Sampling requirements look at the worst case plumbing materials. Samples must be collected in accordance with the regulatory requirements and criteria in order to be used for compliance determinations.

Because the City of Flint serves a population of over 50,000 they are required to have Fully Optimized Corrosion Control. While it is possible to meet the fully optimized requirement without additional treatment, based on their two rounds of sampling since switching to the Flint River, we have determined they did not meet the eligibility for this per the regulation. They now have to complete a study (within 18 months) and are then allowed a period of additional time (2 additional years) to install the selected treatment for Fully Optimized Corrosion Control in accordance with the regulatory requirements. This is what DWSD was required to do back in 1993 – 1997 (see attached letter and study). We are planning to suggest the City directly submit a treatment process to shorten the timeline to achieve full optimization. This letter is currently being drafted but won't be ready to mail out for another week.

Liane and I had a conference call with EPA region V in Chicago on Tuesday to go over all of this and they are in support of these next steps with the City.

The matter will be potentially further complicated when the City switches over to water from the Karegnondi Water Authority next year to re-evaluate the continuing requirement to fully optimize corrosion control.

The DEQ recognizes that there is has been no level of lead exposure determined to be safe, but again the regulation was developed to optimize water corrosivity to limit exposure and the City is following the regulatory requirements.

Lead is not coming from the Flint River or the City's Water Treatment Plant or the public distribution system. It is from lead service lines into homes and from plumbing materials and fixtures within the private property of the household.

As watermains are replaced within the City lead services associated with that section of watermain would be replaced in order to reconnect to City water. This would also place burden on the homeowner to pay for having the service line re-plumbed. However, since 2000 only 16 miles of the City's 500 miles of watermain have been replaced as they did not have the financial means to do so.

Let us know if there are questions or you need any additional information.

Stephen Busch, P.E.

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From: Wurfel, Brad (DEQ)
Sent: Friday, July 24, 2015 12:09 PM
To: Busch, Stephen (DEQ); Prysby, Mike (DEQ)
Cc: Shekter Smith, Liane (DEQ); Wyant, Dan (DEQ); Pallone, Maggie (DEQ)
Subject: Need upate on lead / copper tests for Flint

Guys, the Flint Ministers met with the Governor's office again last week. They also brought along some folks from the community – a college prof and a GM engineer – who imparted that 80 water tests in Flint have shown high lead levels.

Could use an upate on the January / june testing results, as well as recap of the December testing numbers, and any overview you can offer to edify this conversation.

Call me or email today if possible. Thanks!

b

Brad Wurfel
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