



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREETHER  
DIRECTOR

January 23, 2017

VIA E-MAIL

The Honorable Karen Williams Weaver  
Mayor of Flint  
1101 South Saginaw Street  
Flint, Michigan 48502

WSSN: 02310  
City of Flint

Dear Mayor Weaver:

SUBJECT: City of Flint  
Lead and Copper Monitoring of Drinking Water Taps

We appreciate the conversations and efforts the city of Flint (City) has initiated to enhance the water quality for City residents. The City has already implemented many of the requirements that are articulated below and as a result we are pleased to report that the City is below the Action Levels (ALs) for lead and copper during the most recent round of lead and copper monitoring of drinking water taps from July 1, 2016, to December 31, 2016, as summarized below:

Contaminant	AL	MCLG*	90 <sup>th</sup> Percentile Value	Number of Samples Above AL	Typical Source of Contaminant
Lead	15 parts per billion (ppb)	0	12 ppb	24	Corrosion of household plumbing systems; service lines that may contain lead; Erosion of natural deposits
Copper	1,300 ppb	1,300	120 ppb	6	Corrosion of household plumbing systems; Erosion of natural deposit

\*MCLG: Maximum contaminant level goal means the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

**Sample Reporting and 90<sup>th</sup> Percentile Calculation**

The Michigan Department of Environmental Quality (MDEQ) received your Lead and Copper Report form on January 9, 2017. Included with the form were results of samples collected during the July 1, 2016, to December 31, 2016, monitoring period from sites verified as meeting Tier 1 criteria, meaning they were collected from residential sites confirmed as having lead service lines or copper plumbing with lead solder installed between 1983 and 1988. After exclusion of some sample results due to invalidation under the Lead and Copper Rule (LCR), the remaining 368 verified sample results were used to calculate the 90<sup>th</sup> percentile value.

**Continue Corrosion Control Treatment**

The City must continue corrosion control treatment and continue to maintain water quality parameter levels to reduce the amount of lead and copper leaching into the drinking water. The City must also continue monitoring its corrosion control treatment on a daily basis to ensure

proper operation is maintained. In addition, the City must continue monitoring water quality throughout the distribution system to demonstrate the effectiveness of the City's corrosion control treatment. Finally, the City has a contract to develop a Distribution System Optimization Plan. When the Plan is complete, additional, long-term measures may be required to provide optimal corrosion control treatment.

#### **Continue Lead Service Line Replacement**

Because the City exceeded the lead AL in the previous monitoring period of January 1, 2016, to June 30, 2016, the City is required to continue replacing at least seven (7) percent of its lead service lines by **June 30, 2017**. Based on the lead service line estimate submitted by the City, seven (7) percent equates to 2,037 lead service lines (LSLs) that must be replaced by the deadline. LSL replacement may be discontinued if your water supply is at or below the AL for two consecutive six-month monitoring periods. We continue to support the City's intentions of replacing LSLs beyond the requirements of the LCR.

#### **Conduct Water Quality Parameter (WQP) Monitoring**

Continue to conduct WQP monitoring and meet the WQP levels for pH and orthophosphate residuals as required by the October 30, 2015, correspondence from this department.

#### **Lead and Copper Tap Monitoring**

Your next round of lead and copper tap monitoring must be conducted **between January 1, 2017, and June 30, 2017**. You are required to collect a minimum of 60 tap samples from Tier 1 sample locations. Select the same sites used in previous monitoring periods unless sites no longer meet Tier 1 criteria. If a site no longer meets Tier 1 criteria, it must be replaced by another confirmed Tier 1 site if needed to maintain the required number of sites. Documentation explaining the reason for any changes in sampling sites must be provided to the MDEQ.

#### **Consumer Confidence Report (CCR)**

Results of 2016 compliance monitoring must be included in your CCR, which is due to our office, your customers, and the local health department by **July 1, 2017**. However, we encourage the City to provide this CCR to residents as soon as practical. You may use the table format from page 1 of this letter.

For additional information on CCR requirements, visit the MDEQ web site at [www.michigan.gov/drinkingwater](http://www.michigan.gov/drinkingwater). Click on Community Water Supply Home Page and then the Consumer Confidence Report Rule link under Laws and Rules.

#### **Summary of Upcoming Requirements**

<b>Complete By</b>	<b>Requirement</b>	<b>Comments</b>
Ongoing	Collect WQP samples.	Continue to collect required WQP samples.
Between January 1 and June 30, 2017	Collect at least 60 samples from Tier 1 sites within the distribution system and have them analyzed for lead and copper.	Report the results to the MDEQ and deliver the customer notice of individual lead results using the downloadable <i>Lead and Copper Report and Consumer Notice of Lead Result Certificate</i> .
June 30, 2017	Replace seven (7) percent of lead service lines.	Replace a minimum of seven (7) percent of lead service lines.

The Honorable Karen Williams Weaver

Page 3

January 23, 2017

Complete By	Requirement	Comments
July 1, 2017	Report 2016 90 <sup>th</sup> percentile values in the CCR.	Specific lead health effects language must be included.

Thank you for your prompt attention to this matter. We will continue to offer assistance in implementing these regulations. If you have questions, please contact me at 517-284-6524; feighnerb@michigan.gov; or DEQ, Drinking Water and Municipal Assistance Division, P.O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Bryce Feighner, P.E., Division Director  
Drinking Water and Municipal Assistance Division  
517-284-6524

cc: Mr. Christopher Korleski, Director, Water Division, EPA, Region 5  
Mr. Sylvester Jones, City of Flint  
Brigadier General Mike McDaniel (Ret.), City of Flint  
Ms. JoLisa McDay, City of Flint  
Mr. Richard Baird, Governor's Office  
Mr. Keith Creagh, Director, Michigan Department of Natural Resources  
Ms. C. Heidi Grether, Director, MDEQ  
Mr. Bob Wagner, Environment Deputy Director, MDEQ  
Mr. Richard Benzie, MDEQ  
Mr. George Krisztian, MDEQ