

Flint Drinking Water Task Force Lead in Drinking Water Preliminary Assessment;
Date Posted: December 22, 2015

This response is intended to identify how the comments received from the subject document have been applied.

The Lead in Drinking Water Preliminary Assessment was prepared by the Task Force and used as a discussion paper to determine how Flint would continue to pursue their transfer to the Karegnondi Water Authority (KWA). Similarly, it was intended to provide guidance on how to manage corrosion control within the lead lines that exist throughout the city while going back to Detroit Water and Sewerage Department (DWSD) water.

The city of Flint has provided their best inventory of lead service lines that are known. This inventory was described as possibly being 50% correct. The city of Flint has agreed to harvest lead service lines to be utilized in pipe loops that would be constructed at the Flint Water Treatment Plant and used to evaluate the effectiveness of orthophosphate treatment on existing pipe scales. This will be used to improve the pipes serving DWSD water and could assist in the transfer to the KWA.

The Michigan Department of Environmental Quality is currently analyzing anyone's water for free to identify the lead level within their home. The Michigan Department of Health and Human Services has been holding clinics with the Genesee County Health Department to test blood levels in children. To date, no patterns have been identified. The city of Flint has been evaluating water quality parameters weekly and provides a monthly operating report with the information identified in the document. Currently, Flint does not treat water, so adjusting water quality parameters relative to treatment options is not available.

As Flint moves to the KWA, testing will be necessary and completed on a pilot plant basis utilizing the Saginaw/Midland water supply. This testing will establish the water quality parameters achievable and identify the corrosion control optimization that is needed. When KWA source water becomes available, the full-scale treatment will be provided by the city of Flint and parameters verified prior to delivery of any water to the distribution system. This will demonstrate the city of Flint's ability to meet water quality parameters as part of the treatment they propose to use.

The State has proposed sentinel sampling sites that will be used to evaluate trends in the release of lead from service lines. Four hundred sites have been targeted, and it is anticipated lead, copper, and galvanized service lines will be found to look at trends in the leaching of lead.



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 30, 2015

VIA E-MAIL and U.S. MAIL

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**

This information shall be included in the City's monthly operation report and shall be reported to the MDEQ as required under Administrative Rule 1502 (R 325.11502) of the administrative rules promulgated pursuant to Act 399.

Enhanced Water Quality Parameter Monitoring

The City's revised monitoring schedule dated October 22, 2015, requires quarterly Water Quality Parameter Monitoring at 25 sites throughout the City's water distribution system for temperature (Celcius), Conductivity (mS), pH, Total Alkalinity (mg/L as CaCO₃), Calcium (mg/L as Ca²⁺), and orthophosphate (mg/L PO₄). Ten of these 25 sites are also used by the City to conduct required total coliform bacteria and chlorine residual monitoring (location numbers 1, 2, 3, 4, 5, 6, 7, 8, CS, and WS). **At these ten locations, the City shall also conduct weekly monitoring for the following parameters at the same time that total coliform bacteria and chlorine residual monitoring is conducted to further assess water stability:**

- Turbidity (NTU)
- Iron (mg/L)
- Orthophosphate (mg/L PO₄)
- pH
- Total Alkalinity (mg/L as CaCO₃)
- Calcium (mg/L as Ca²⁺)
- Chloride (mg/L as Cl⁻)
- Temperature (Celcius)
- Conductivity (mS)

In addition to the 10 locations, the entry point to the distribution system should be one of the locations for enhanced water quality parameter monitoring.

If orthophosphate residual levels less than 3.1 mg/L as PO₄ (1.0 mg/L as P) are detected at any of these locations, then orthophosphate dosage shall be increased to achieve the minimum phosphate residual of 3.1 mg/L as PO₄ (1.0 mg/L as P) at all locations. In addition, if pH levels of 7.0 or less are detected at any of these locations, the City shall immediately notify the MDEQ.

Corrosion Control Treatment Test Loops

To further confirm the effectiveness of corrosion control treatment and the City's operations, it is recommended that the City construct, install, and monitor test loops of service line and plumbing materials. Instructions for construction, installation, and monitoring of these test loops can be obtained from the United States Environmental Protection Agency's (U.S. EPA) Office of Research and Development. The U.S. EPA has also offered to provide analytical services to support this investigative effort. Please contact Mr. Darren Lytle, Acting Branch Chief, at 512-569-7432 or lytle.darren@epa.gov.

Lead Service Line Verification Sampling

The City has been reviewing customer service connection records in order to confirm customer service line materials at each connection. The U.S. EPA has developed a sampling procedure that can be used to help verify the presence of lead service lines and it is recommended that the City conduct this sampling at a selection of customer locations for this purpose. Information regarding this verification sampling can also be obtained from Mr. Lytle. Any water analysis for samples meeting the criteria for inclusion in the 90th percentile calculation for lead and copper compliance must be completed by a certified laboratory.

Customer Household Exposure Assessment

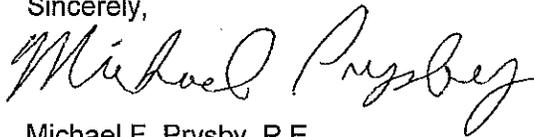
The Michigan Department of Health and Human Services (MDHHS) is continuing to conduct blood lead level testing for children in the City. Families with children found to have elevated blood lead levels will be asked to have an elevated blood lead level investigation conducted at their residence that will include a lead exposure assessment, including the contribution of lead from water service lines and premise plumbing. This diagnostic testing is different than the first draw sampling being conducted by the City and should help further substantiate the effectiveness of corrosion control treatment. Any water analysis samples meeting the criteria for inclusion in the 90th percentile calculation for compliance purposes for lead and copper must be completed by a certified laboratory.

Flint Water Treatment Plant Evaluation of Karegnondi Water Authority (KWA) Raw Water

The City is planning to change source water in the next year to raw water from Lake Huron purchased from the KWA. The City is required to evaluate the Flint Water Treatment Plant (WTP) processes related to optimization of corrosion control treatment using source water purchased from the KWA to determine if any adjustments are necessary. It is recognized that full scale testing at the Flint WTP may not be feasible. A report of this evaluation shall be provided to our office for review and approval prior to initiating service of this treated water to its customers.

If you have any questions regarding this correspondence, please contact me at the number below or at prysbym@michigan.gov.

Sincerely,



Michael F. Prysby, P.E.
District Engineer
Field Operations Section
Office of Drinking Water and
Municipal Assistance
517-290-8817

cc: Mr. Brent Wright, City of Flint
Mr. Howard Croft, City of Flint
Ms. Natasha Henderson, City of Flint
Mr. Darren Lytle, U.S. EPA
Mr. Samir F. Matta, P.E., Lockwood, Andrews & Newnam, Inc.
Mr. Warren Green, Lockwood, Andrews & Newnam, Inc.
Mr. James Henry, Genesee County Health Department
Dr. Linda Dykema, MDHHS
Mr. Jim Sygo, Chief Deputy Director, MDEQ
Mr. Stephen Busch, MDEQ
Mr. Adam Rosenthal, MDEQ