



Dr. Karen Weaver  
Mayor

September 28, 2016

VIA E-MAIL

Keith Creagh, Director, DNR  
Constitution Hall  
525 West Allegan Ave.  
Lansing, MI 48909

Dear Mr. Creagh:

The MDEQ has requested an inventory of lead service lines to be submitted by September 30<sup>th</sup> for compliance with the Action Level Exceedance for lead.

In the 2016 Water Reliability Study recently completed by Rowe Professional Services Company, this information is included in Table 13 (Page 16):

<b>Table 13: Service Line Material</b>				
<b>Service Material</b>	<b>All</b>		<b>Occupied</b>	
	<b>Quantit</b>	<b>Percent age</b>	<b>Quantit</b>	<b>Percent age</b>
Copper	25,784	46.0%	22,995	52.9%
Galvanized	12,011	21.4%	7,889	18.2%
Lead	4,341	7.7%	3,414	7.9%
Unknown	13,898	24.8%	9,104	21.0%
Other	4	0%	4	0%
<b>Totals</b>	<b>56,03</b>		<b>43,40</b>	

\* Service information is based on records of the materials in the ROW only.

The information was based on data believed to have been developed by the Department of Natural Resources through research of City of Flint record and their investigations.

Rowe states that, in addition to the services documented as lead, experience has demonstrated that many of the services listed as unknown are also expected to be composed of lead. If we estimate that 75% of those unknown services are lead, the total lead services in the city would approach 14,800. The City is not satisfied with reliance on this estimate nor on the previous evaluations.

The City currently has contracts for service lead replacements underway. In the three isolated areas of work, it has been found that 165/171 services lines have contained a lead portion or were completely lead. City Records indicated that number to be 40% lead and 15% unknown – but in reality, based on the replacements, the percentage is closer to 96% lead.

This discovery leads one to believe that the city records were either being interpreted incorrectly (possible unknown assumptions could be missing) or that they are less accurate than previously believed.

In order to gain a more accurate number of the many lead lines in the City, a hydro-excavation contract has been issued to two contractors who intend to begin work within the next five days. Within three weeks, the public and private service line material shall be identified in 200-300 homes throughout the City. This will provide the data for a better interpretation of the City records, as well as provide a more accurate percentage of lead lines, when combined with the verified data already collected.

The City, through the FAST Start Team, will provide an updated estimate of lead service lines in approximately 30 days, after assessment of the data gained from the hydro-excavation and the completion of Phase II of residential service line replacements. This will be, as can be seen from the data thus far, an ongoing process, with the number and percentage of lead lines to be found in the City to be updated based on further data received.

Sincerely,

/s/

BG (ret) Mike McDaniel  
FAST Start Coordinator