



CITY OF FLINT

DEPARTMENT OF PUBLIC WORKS & UTILITIES

SHELDON A. NEELY
MAYOR

ROBERT BINCSIK
DIRECTOR

December 27, 2019

Eric Oswald, EGLE Director of Drinking Water and Environmental Health
Constitution Hall 525 West Allegan St.
P.O. Box 30473
Lansing, MI 48909-7973

Sent via Email

Dear Mr. Oswald:

I am writing you to request an extension on the identification of the City's LCR sampling sites for the sampling period from July 1 through December 31, 2019 and an extension on the required LCR sampling plan required for the next sampling period beginning Jan 1, 2020.

As of today's date we believe we have 43 samples and addresses confirmed as tier 1 sample sites. We continue to collect samples and identify materials in an attempt to reach the requirement of 60 samples for the sample period. The City has been in constant contact with EGLE regarding the challenges it faces with the continued collection of tier 1 samples. We will continue to work up until the end of sampling period to collect samples but will need additional time to identify the service line materials at these addresses.


The City will need to continue to work together with the EGLE to develop a sampling plan that takes into consideration some points of concern we believe are valid and will require some conversations between the City of Flint and EGLE as follows:

- When developing the new sampling plan we anticipate utilizing tier 2 sample sites but we realized all of the tier 1 sites may not be removed from the system prior to the beginning of the sampling period on Jan 1 2020. If we moved forward with submitting the plan utilizing only tier 2 sites it may not be in compliance with the Lead Copper Rule.
- In order to comply with the LCR we will have to utilize any remaining tier 1 sites first and then move on to the tier 2 addresses as needed to complete our 60 required samples. At this time we don't know how many tier 1 addresses remain in the water system. Sometime during the next sampling period we do believe we will complete all of the residential addresses remaining in the water system.

The situation is very dynamic. Therefore, the City is requesting to work with EGLE on the abovementioned issues to development an acceptable solution and extensions of time to arrive at the solution.

Thank you in advance for your continued assistance.

Sincerely,


Robert Bincsik

CC:

Michael Harris, EPA

Beth Murphy, EPA

George Kristian, EGLE

Clyde Edwards, COF

Brian Larkin, COF

Angela Wheeler, COF

Blair Selover, FV Operations

Robert Jones, FV Operations