



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

September 26, 2016

VIA E-MAIL

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

Dear Mayor Weaver:

In a letter dated September 2, 2016, the United States Environmental Protection Agency (USEPA) urged the city of Flint (City) to make a final source water decision. That letter included estimated time lines associated with three possible source water decisions, which were:

- 1) The City treats raw water from the Karegnondi Water Authority (KWA);
- 2) The City receives treated water from Genesee County; and,
- 3) The City continues to receive treated water from the Great Lakes Water Authority (GLWA).

On September 6, 2016, you and other representatives from the City presented the final source water selection plan to me and representatives from the USEPA, the Michigan Department of Environmental Quality (MDEQ), and the Governor's Office. Specifically, the plan for primary water source is to receive raw water from the KWA and treat it using the City's existing Water Treatment Plant (WTP). The proposed backup water source plan is to construct a raw water reservoir to supply the WTP in the event the KWA raw water line was temporarily out of service. One of the factors in making this decision expressed during the meeting was the City's desire to have an autonomous water supply. The City also expressed their need for additional financial resources to carry out their plan.

The time line associated with this decision is dependent on a number of factors, including the construction of the three-mile connector pipe to supply KWA raw water to the WTP so that adequacy of treatment can be demonstrated before the WTP supplies finished water to the public. Paragraph 60 of the USEPA's Order issued on January 21, 2016, requires this "performance period," which is estimated to take three to six months. Further, Paragraph 60 requires the City to submit a written plan for their new water source and to offer the opportunity for public comment on that plan. The City's plan also included requests for funds to evaluate necessary upgrades to the WTP. This evaluation would need to be performed by a consulting engineering firm. The time lines associated with processing public comments on the plan, issuing a Request for Proposal, and then completing the WTP evaluation are uncertain at this time.

On September 9, 2016, representatives from the City and the State met with the Genesee County Drain Commissioner and his representatives to discuss the City's source water decision and any impacts on the estimated time lines for the City and Genesee County Drain Commission (GCDC).

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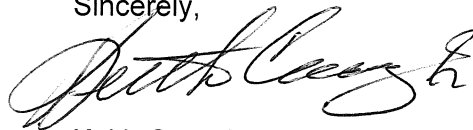
We were pleased to learn that the plans to construct the three-mile connector pipe are proceeding on schedule and the final route chosen will reduce its length and cost from earlier estimates. It is anticipated that this pipe will be ready to supply KWA raw water to the WTP by April 2017 so the City can then begin its three- to six-month performance period. We were also pleased to learn that Genesee County is currently conducting extensive pilot testing on the KWA raw water and is willing to share this testing data with the City. This data will assist the City in evaluating necessary upgrades to the WTP and preparing for their full-scale performance period.

The GCDC is planning to have their new WTP ready to supply finished water to their customers by October 2017 using the existing 72-inch transmission line currently supplying finished water to the City from the GLWA. When the GCDC begins using the 72-inch line, the City will no longer have access to finished water from the GLWA as a primary or backup water source. Therefore, we were very pleased to learn that the GCDC is willing to enter into discussions with the City about the GCDC furnishing finished water to the City in a short-term, emergency situation. We encourage the City and GCDC to begin this dialogue immediately as it appears a raw water reservoir for backup supply to the City could not be constructed by October 2017.

Paragraph 60 of the USEPA's Order requires that the City demonstrate technical, managerial, and financial capacity to meet Safe Drinking Water Act requirements. Operating a water system that treats raw water requires a higher level of technical and managerial expertise than operating a water system that primarily distributes treated water. We are pleased that the City and the MDEQ have agreed on a plan for the City to develop this expertise, which will include operational, management, and training assistance to the City, using a combination of MDEQ staff and outside experts. The training portion of this plan is set to commence on September 27, 2016. Regarding financial capacity, the State of Michigan is committed to continuing to partner with the City to identify financing options.

Many thanks to you and your staff who have assisted in developing the City's source water plan. The MDEQ continues to be a full partner with the City and the USEPA, with its primary focus on ensuring a safe drinking water system for the residents of Flint.

Sincerely,



Keith Creagh
Director
Michigan Department of Natural Resources

cc: Brigadier General Mike McDaniel (Ret.), City of Flint
Mr. Sylvester Jones, City of Flint
Ms. JoLisa McDay, City of Flint
Mr. Mark Adas, City of Flint
Mr. Jeff Wright, Genesee County Drain Commissioner
Mr. Robert Kaplan, Acting Regional Administrator, USEPA, Region 5
Mr. Mark Pollins, USEPA
Mr. Richard Baird, Governor's Office
Ms. C. Heidi Grether, Director, MDEQ
Mr. Robert Wagner, Program Deputy Director, MDEQ
Mr. Bryce Feighner, MDEQ
Mr. George Krisztian, MDEQ