



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

May 31, 2018

VIA E-MAIL

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

Dear Mayor Weaver:

SUBJECT: Lead Service Line Removal Activities

I am writing to address a significant concern that the Michigan Department of Environmental Quality (MDEQ) has recently become aware of. Our records indicate that at the end of the 2017 hydro-excavation period, 404 addresses identified as having non-copper material remained in service and need to be replaced per the Concerned Pastors Settlement Agreement.

Recently, two contractor firms, WT Stevens and Waldorf & Sons, were granted additional addresses for replacement in the Spring of 2018, as a continuation of the Phase IV Service Line Replacement (SLR) efforts. The addresses did not appear on the original Phase IV list and only six addresses were from the list of homes previously hydro-excavated in 2017. It now appears that of the 211 homes listed as complete in the city of Flint's (City) data tracker as of May 30, 2018, 124, or 59 percent, were excavated by the above contractors and discovered to be of copper material not needing replacement. The City's average cost for excavation completed by hydro-excavation to determine material type is \$228 while the average cost for excavation not needing replacement is \$1,660, if completed by a SLR contractor. This is a significant cost difference of approximately \$177,000 or the equivalent of 35 homes which could have full service lines replaced.

The MDEQ is emphasizing that, moving forward, all service lines that are to be replaced utilizing federal or state funding should first be hydro-excavated to determine material type. Our understanding is that Phase V hydro-excavation is well underway. This, combined with the remaining addresses from last year, should provide sufficient addresses to begin the Phase V SLR efforts. Please notify us immediately if there are homes where the material type cannot be determined via hydro-excavation efforts and/or the SLR efforts exceed the speed of hydro-excavation efforts.

The MDEQ is requesting that the City **provide a written response** as to how the addresses awarded to WT Stevens and Waldorf & Sons were chosen, what criteria was used in the selection process, and how the City will move forward with the 404 known addresses needing replacement. Please provide this response by **June 15, 2018**.

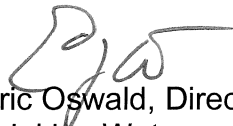
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Thank you for your prompt attention to this matter. If you have questions, please contact me at 517-284-6524; oswalde1@michigan.gov; or DEQ, Drinking Water and Municipal Assistance Division, P.O. Box 30817, Lansing, Michigan 48909-8311.

Sincerely,



Eric Oswald, Director

Drinking Water and Municipal Assistance Division

cc: Mr. Mark Adas, City of Flint
Mr. Rob Bincsik, City of Flint
Mr. Hughey Newsome, City of Flint
Mr. Alan Wong, AECOM
Mr. Christopher Korleski, Director, Water Division, Region 5, United States
Environmental Protection Agency (USEPA)
Mr. Tom Poy, USEPA
Mr. Anthony Ross, USEPA
Mr. Richard S. Kuhl, Michigan Department of Attorney General
Ms. C. Heidi Grether, Director, MDEQ
Ms. Amy Epkey, Administration Deputy Director, MDEQ
Mr. Michael McClellan, Environment Deputy Director, MDEQ