

July 8, 2022



VIA E-MAIL

Mr. Ernie Sarkipato, P.E.
Surface Water Treatment Specialist
Drinking Water and Environmental Health Division
Michigan Department of Environment, Great Lakes, and Energy
State Office Building
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341

RE: Request for Approval to Conduct Reduced Monitoring for Lead and Copper

Dear Mr. Sarkipato:

The City of Benton Harbor ("City") is in the process of replacing lead water service lines. At this time, more than 70% of the verified lead service lines have been replaced. As a result, the lead and copper sample site pool has been reduced to 51 verified sites, fewer than are needed to collect the 60 samples required for the current monitoring period, July – December 2022, even if no additional service lines are replaced.

In order to collect 60 samples, the City would need to utilize unverified sample sites. Per EGLE's Lead and Copper Monitoring letter dated August 3, 2021:

"All samples must be collected from targeted locations that represent the highest Tier available. Once these sites are identified, verified, and memorialized on an approved Lead and Copper Sampling Plan, the same sites shall be used in each monitoring period unless you can no longer gain entry to the site(s) or the site(s) no longer meets the tiering criteria (Administrative Rule 325.10710a(1)). Since Benton Harbor has lead service lines that serve water to single family homes, all sites sampled must be Tier 1 sites. These sites must have verified service line materials and must be reflected on your Lead and Copper Sampling Plan."

The City has met the lead and copper action levels and maintained the range of values for the water quality parameters for two (2) consecutive 6-month periods: July – December 2021 and January – June 2022. Therefore, the City is requesting approval to implement reduced monitoring for lead and copper under the provisions of the Michigan Safe Drinking Water Act as follows:

R 325.10710a Lead and copper in tap water; monitoring requirements, subrule 4(d)(ii)

A water supply that meets the lead and copper action levels and maintains the range of values for the water quality control parameters reflecting optimal corrosion control treatment specified by the department under R 325.10604f(3)(f) during each of 2 consecutive 6-month monitoring periods may reduce the frequency of monitoring to once each year and reduce the number of lead and copper samples under subrule (3) of this rule if it receives written approval from the department. This sampling shall begin during the calendar year immediately following the end of the second consecutive 6-month monitoring period. The department shall review monitoring, treatment, and other relevant information submitted by the water supply under R 325.10710d, and shall notify the supply in writing when it determines the supply is eligible to commence reduced monitoring under this subrule. The department shall review, and where appropriate, revise its determination when the supply submits new monitoring or treatment data, or when other data relevant to the number and frequency of tap sampling becomes available.

The City has a service population of 9,103. Per R 325.10710a Lead and copper in tap water; monitoring requirements, subrule 3, a total of 20 sample sites would be required for reduced monitoring. Reducing the number of required lead and copper samples from 60 to 20 would allow the City to utilize verified

sample sites for the current monitoring period, July – December 2022. Even though the Administrative Rule referenced above specifies that sampling shall begin during the calendar year following the second consecutive 6-month monitoring period during which action levels were met, or during 2023, the City is willing to perform reduced monitoring for lead and copper during the second half of 2022.

Feel free to contact us if you have any questions.

Sincerely,



Ellis Mitchell
City Manager

cc: Ms. Jeni Bolt, EGLE
Mr. Brandon Onan, EGLE
Mr. Michael Bolf, EGLE
Mr. Darold Harlan, F&V Operations and Resource Management, Inc.
Mr. Robert Jones, F&V Operations and Resource Management, Inc.
Mr. Abul Ahmed, F&V Operations and Resource Management, Inc.