

July 28, 2022

Submitted via email

Liesl Clark, Director
Michigan Department of Environment,
Great Lakes, and Energy

Elizabeth Hertel, Director
Michigan Department of Health
And Human Services

Re: Point of Use Water Filters in Benton Harbor

Dear Director Clark and Director Hertel,

Thank you for your willingness to share information about the work that EGLE and MDHHS are undertaking to ensure all Benton Harbor residents have safe drinking water. While we have remaining questions regarding efforts to ensure compliance with the Surface Water Treatment Rules, which we will detail in a separate and forthcoming letter, we observe that many Benton Harbor residents are facing an ongoing documented health risk because they may be drinking tap water without a properly installed and maintained water filter, particularly in households that have recently had or will have their lead service line replaced.

The requests for bottled water have greatly decreased over the summer months, which means that Benton Harbor residents are drinking tap water with greater frequency. Two factors suggest that drinking unfiltered tap water still presents significant health risks for Benton Harbor residents. First, sampling results show that 42% of Benton Harbor voluntary samples and 63% of compliance samples from the most recent compliance sampling period have detectable lead in the first liter of water out of the tap. This suggests many residents are not using a properly installed water filter. Second, lead service lines are being replaced at a rapid rate, leading more residents to believe it is safe to drink water directly from the tap when, in reality, lead service line replacements may increase the risk of lead contamination in the near-term. As such, at this time we think it's important to ensure that every Benton Harbor resident has a properly installed water filter.

The Flint Water Crisis provides a precedent for appropriate measures to protect residents as Benton Harbor continues to replace lead service lines. In Flint, Michigan was required to establish the Community Outreach and Resident Education (CORE) program, which consisted of hiring dozens of education specialists to go door-to-door to ensure that every household had a

properly installed water filter and training about how to use it. We believe EGLE and MDHHS should follow this model in Benton Harbor this should include the following:

- Water filters distributed to residents must be certified to meet the ANSI/NSF standard 53 for lead reduction and ANSI/NSF standard 42 for particulate reduction
- Follow the model set in Flint and establish the CORE program in Benton Harbor by hiring 90 education specialists, preferably Benton Harbor residents, to provide outreach regarding water filter outreach and education. This should include going door-to-door to provide the following:
 - Faucet-mount filters at all households. For households that already have faucet-mount filters, ensure they are properly installed and maintained;
 - Provide pitcher style filters only for households with faucets that are not compatible with faucet mount filters. The Benton Harbor filter study demonstrates that faucet mount filters are more reliable than pitcher style filters;
 - Filter education to residents, including training about why filters are important, how to properly install and use water filters, how to maintain water filters, and how to replace water filters;
 - Information about how residents can obtain replacement water filters in the future and contact information for further assistance;
 - Dedicate \$50,000 in funding to publicize the CORE program.
- Conduct in-home visits to ensure that all homes that have a lead service line replaced are properly flushed per contract requirements and immediately receive water filters. Resample the water after flushing has been completed, especially at homes that were not properly flushed at the time the lead service line was replaced. If residents already have water filters, ensure they are properly installed;
- Conduct in-home visits to any home where any sample finds the presence of lead as soon as possible to ensure they have a properly installed water filter.

While rapidly replacing lead service lines is commendable and necessary to achieve the ultimate goal of safe drinking water for Benton Harbor residents, the act of replacing lead service lines also creates elevated risks of lead in drinking water. We urge you to adopt the measures outlined above to ensure that all Benton Harbor residents have consistent access to safe drinking water. As soon as possible, we would greatly appreciate scheduling a meeting to discuss this matter in more detail.

Sincerely,

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Submitted on Behalf Of:

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