



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



DANIEL EICHINGER
ACTING DIRECTOR

March 10, 2023

VIA EMAIL

Ellis Mitchell, City Manager
City of Benton Harbor
200 Wall Street
Benton Harbor, Michigan 49022

WSSN: **00600**
County: Berrien
System: Benton Harbor

SUBJECT: Response to Request to Reduce Number of Lead and Copper Sampling Sites

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Drinking Water and Environmental Health Division (DWEHD), received a letter from the city of Benton Harbor (City) that was dated and received on February 14, 2023, by email to Mike Bolf, Supervisor, Engineering Unit, DWEHD. The letter addressed the City's current status of their service line replacement program, recent sampling range values for lead and copper, and an official request to reduce lead and copper monitoring. Staff from EGLE's Lead and Copper, Unit, Engineering Section, and Division management discussed and evaluated your request.

EGLE sent the City an annual monitoring schedule in February of 2023 which outlined the requirement to sample once per six-month period in 2023 for lead and copper in the amount of 60 sites, according to the administrative rules promulgated under the Michigan Safe Drinking Water Act, 1976 PA 399, as amended (Act 33); specifically, R 325.10710a, *Lead and copper in tap water; monitoring requirements*.

The purpose of tap monitoring for lead and copper is to get a sense of corrosion rates throughout the system. While the City has reported values for lead and copper under the Action Level (AL) for the last three consecutive monitoring periods, only during the last monitoring period were Tier 3 sites used as part of the compliance calculation. Now that the City is nearly complete with their service line replacement program, we anticipate the next round of compliance sampling will be comprised of nearly, if not all, Tier 3 sites, or single family residences with copper plumbing with lead solder installed before July 1988. The downward trend in the 90th percentile values are encouraging; however, because different sites will be sampled and the system still needs time to stabilize, a reduction in monitoring will not be approved at this time. The City must continue sampling with the recommended 60 monitoring sites for at least the next year. The authority for this determination is Act 399, R 325.10732, *Specific testing frequencies, sample locations and parameters*.

As a reminder, the sites listed in the City's revised sampling site plan dated March 6, 2023, are listed in order of priority according to the highest risk criteria. These should be targeted as such to maintain as much consistency as possible through each monitoring period moving forward. Any sites that are not served by a lead line should be sampled using the first draw, one bottle sampling process. If you need updated instructions or reporting forms, please visit www.michigan.gov/lcr.

If you have any questions regarding this letter, please contact me at BolfM@Michigan.gov; Engineering Section Manager, DWEHD, EGLE, P.O. Box 30817, Lansing, Michigan 48909-8311; or at the phone number provided below.

Sincerely,

Mike Bolf, Manager
Engineering Section
Drinking Water and Environmental
Health Division
906-630-4107

cc: Darold Harlan, F&V Operations
Rob Jones, F&V Operations
Summer Haught, EGLE
Jeni Bolt, EGLE
Erin Russell, EGLE