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Sent: Friday, May 01, 2015 11:38 AM
To: Deltoral, Miguel
Cc: Porter, Andrea; Crooks, Jennifer; Poy, Thomas; Benzie, Richard (DEQ); Busch, Stephen (DEQ)
Subject: RE: Flint Corrosion Control?

Hi Miguel - sorry, I should have been more specific in my previous email. The rules you stated below allow large systems to be considered having optimal corrosion control if they have data from two consecutive 6 month monitoring periods that meet specific criteria. DEQ-ODWMA has not made a formal decision as to whether or not the City of Flint meets the exemption criteria or will be required to do a corrosion control study since Flint has only completed one round of 6 month monitoring. The City of Flint's second round of monitoring will be completed by June 30, 2015, and we will make a formal decision at that time. If my memory is correct, this is consistent with the process followed in the early 1990's for large systems when the Pb/Cu rule was first implemented. The Department waits until large systems complete both rounds of full scale, 6 month monitoring before making a decision about optimal corrosion control. If it is determined that Flint has to install corrosion control treatment, the rule allows up to 2 years to complete a study and 2 additional years to install the treatment unless we set a shorter time frame.

As Flint will be switching raw water sources in a just over one year from now, raw water quality will be completely different than what they currently use. Requiring a study at the current time will be of little to no value in the long term control of these chronic contaminants.

Finally, the City of Flint's sampling protocols for lead and copper monitoring comply will all current state and federal requirements. Any required modifications will be implemented at the time when such future regulatory requirements take effect.

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