



## CITY OF FLINT

**Dr. Karen W. Weaver**  
Mayor

March 16, 2016

Mr. Mark Pollins, Director  
Water Enforcement Division  
Office of Civil Enforcement  
Office of Enforcement and Compliance Assurance  
United States Environmental Protection Agency  
William Jefferson Clinton Building  
1200 Pennsylvania Avenue, NW (2243A)  
Washington, DC 20460

Dear Mr. Pollins:

Thank you for your correspondence of February 19, 2016. The City of Flint ("City") continues to work in conjunction with the Michigan Department of Environmental Quality ("MDEQ"), the United States Environmental Protection Agency's ("EPA"), as well as other state and federal agencies, in order to fully comply with the Emergency Order issued on January 21, 2016. Our ultimate goal is to ensure a reliable and sustainable safe drinking water system for the people of the City.

In your February 19 correspondence, your primary focus was on two issues requiring immediate attention. Firstly, the development of a comprehensive plan to ensure optimization of corrosion control for the current source water – the Great Lakes Water Authority (GLWA). As you are aware, a corrosion control design proposal was provided by the City on October 16, 2015. After review by the MDEQ and EPA Task Force staff, a collective recommendation was made to increase the dosing of orthophosphate to a level beyond the typical levels maintained by the GLWA. On October 28, 2015, the MDEQ issued a construction permit to the City for the installation of equipment to provide additional corrosion control treatment. The MDEQ followed up with correspondence dated October 30, 2015, wherein the orthophosphate residual goal in all areas of the distribution system were established at 3.1 mg/L. On December 9, 2015, the City began adding supplemental orthophosphate to the distribution system from the Flint Water Plant. As of today, we continue to add supplemental orthophosphate and residual chlorine to the distribution system. The associated sampling and monitoring information is discussed and provided to the MDEQ weekly for posting on the [www.michigan.gov/flintwater](http://www.michigan.gov/flintwater) web site.

The City and the MDEQ have cooperated in drafting a request for proposals to solicit an experienced consultant to assist in establishing sufficient corrosion control while utilizing water from GLWA, and as we transition to the Karegnondi Water Authority (KWA), which will go out to the public on March 23, 2016 and should thereafter be under contract with the selected vendor by early May 2016. This consultant will be utilized to guide the long term goal of optimization of the distribution system throughout the planned transition to the KWA. We understand that the switch to KWA treated water will not occur without the approval of MDEQ and EPA staff. A wide range of current and

historical information collected by the City, the MDEQ and EPA will be available for use by the consultant, such as: weekly monitoring reports; residential test results; sentinel sampling results; pipe rig/loop testing; AWOP resources; updated reliability plan; and, the continuous discovery of known lead service lines based upon field verifications.

Currently, the City is planning and implementing a lead line replacement program. The MDEQ and EPA will be informed of the actions of the "Fast Start" program. As the program is implemented, any recommendations from either organization will be welcome. Understandably, there will still be a need for a comprehensive optimized corrosion control plan for the City.

Secondly, the overall staffing of qualified personnel needed to ensure that the City's public water system complies with the Safe Drinking Water Act (SDWA) and the National Primary Drinking Water Regulations (NPDWRs), including the Lead and Copper Rule is being addressed. Currently, the City is in the process of scheduling interviews for the position of Director of Public Works. An additional MDEQ F-1 licensed individual has been hired as a Water Plant Supervisor, with an anticipated start date later this month. Next week, a number of job openings will be posted at both the Water Treatment Plant and the Water Distribution System to fill current vacancies. It is anticipated that this will allow the City to fill 4 Water Plant Operators by early April, 10 Water Distribution System Operators by early June, and 2 Lab Technicians by early June. As these vacancies are filled, we will continue to evaluate and, if necessary, increase staffing to meet the needs of the water system.

Please refer to Attachment A, which outlines the City's response and current status for the eleven items identified in Attachment C of your February 19 correspondence. We believe that progress has been made in each item identified in your letter based feedback from members of the EPA and MDEQ. Further, meetings with the EPA, MDEQ, and City staff continue to be beneficial in understanding and complying with the conditions and expectations of the Administrative Order.

Sincerely,



Dr. Karen W. Weaver  
Mayor, City of Flint



## Attachment A

1. Respondents have not responded in writing to the EPA Flint Task Force's requests and recommendations (Paragraph 52). The tracking spreadsheet information titled "Flint's Safe Drinking Water Task Force, Recommendations Tracking Spreadsheet" supplied by the EPA on February 26, 2016, was recently updated with additional information from the City and sent to the State for posting.
2. Respondents have not provided all lead in water testing results for the City since January 2013 (Paragraph 53(b)). Based upon additional information supplied to the MDEQ clarifying dates of data gathering, and subsequent conversations with EPA staff at the February 23, 2016 meeting, it is our understanding that this issue has been adequately addressed.
3. The existing inventory of homes with lead service lines submission is not adequate (Paragraph 54(a)). (Primary responsibility: MDEQ) the City will provide assistance as necessary to the MDEQ.
4. Respondents have not adequately demonstrated (e.g., using daily sampling information) that they are maintaining chlorine residual in the distribution system (Paragraph 57), or continuing to add corrosion inhibitors at levels sufficient to re-optimize corrosion control in the distribution system (Paragraph 58). (Primary responsibility: MDEQ) A weekly update of the Monthly Operational Report along with Weekly Water Quality Parameters is submitted weekly to the MDEQ for posting on the website.
5. Respondents have not provided plans and schedules to ensure the treatment plant is consistently and reliably meeting plant performance criteria (Paragraph 59(a)). (Primary responsibility: City) The City has a standing weekly conference call with MDEQ staff to discuss weekly data with regard to treatment plant performance.
6. Respondents have not submitted a plan for daily monitoring of water quality parameters in the distribution system (Paragraph 59(b)). (Primary responsibility: City) A weekly update of the Monthly Operational Report along with Weekly Water Quality Parameters is submitted weekly to the MDEQ for posting on the website. It is our understanding that this deficiency has been adequately addressed.
7. Respondents have submitted an inadequate operations plan for the corrosion control equipment and daily monitoring of finished water corrosion control parameters (Paragraph 59(c)). (Primary responsibility: City) The primary response and current status are supplied in the context of the accompanied response letter in the solicitation of a consultant to help draft a sufficient plan.
8. Respondents submitted a list of staff, but have not adequately demonstrated that the City has the necessary, capable and qualified personnel required to perform the duties and obligations required to ensure the public water system complies with the SDWA and the National Primary Drinking Water Regulations (Paragraph 61). (Primary responsibility: City) The City has provided organizational charts and corresponding job duties for Water Plant and Water Distribution staff. The City is currently looking to fill vacancies for the Director of Public Works and current vacancies at the Water Plant and Water Distribution System. Additional information is being compiled with regard to engineering firm services related to this item. Currently the City utilizes Rowe Engineering to act as City Engineer.

Lockwood, Andrews and Newnam Engineering Services are utilized for water plant operations and design services.

9. Respondents have not yet provided a list of the "Independent Advisory Panel" membership (Paragraph 63). (Primary responsibility: MDEQ)

10. Respondents must identify the 25 sites within the distribution system from which water quality parameter measurements are taken (Paragraph 53(a)). The City provided the list of addresses of all 25 sites to the MDEQ for posting on the website. It is our understanding that this deficiency has been adequately addressed.

11. Respondents must confirm they have identified all of the areas in the City with elevated blood lead levels (Paragraph 53(c)). (Primary responsibility: MDEQ)

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