



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 27 2017

REPLY TO THE ATTENTION OF:

W-15J

Mr. Sylvester Jones, Jr.
City Administrator
City of Flint - Mayor's Office
1101 South Saginaw Street
Flint, Michigan 48502

Re: EPA's Involvement in Treatment Changes at the Flint Water Treatment Plant

Dear Mr. Jones:

I am writing in follow up to Acting Regional Administrator Robert Kaplan's letter of November 16th to Mayor Weaver. I understand that you may still have questions about EPA's role.

It is important to emphasize that EPA is not imposing *any* new requirements with regard to water treatment. EPA's recommendations, which have not changed since May of 2016, are based on the need to maintain consistent water quality (including disinfection) in the distribution system and to undertake the prescribed corrosion control action which includes a pH component. Here is a brief summary of those recommendations:

- On May 16, 2016, EPA's Flint Safe Drinking Water Task Force, now known as EPA's Flint Technical Support Team, recommended that the City take steps to address and correct low pH levels in the distribution system. This recommendation was based on years of research that indicate maintaining a pH above 7.0 aids in the effectiveness of orthophosphate treatment to minimize lead release.
- In addition, as part of EPA's oversight of the January 21, 2016 Emergency Order, Mark Pollins sent a letter to the City and MDEQ on June 3, 2016 that reinforced EPA's concerns with the low chlorine residual levels in the system as well as the City's inability to raise the pH in the system in the absence of a chemical feed system for caustic soda (caustic feed). At that time, EPA recommended that the target pH range in the system be maintained at 7.5 ± 0.3

The City's consultant, Arcadis, has been tasked with optimizing Flint's distribution system through use of the chemical feeds at the water treatment plant. Both Arcadis and MDEQ have been recommending that the City increase the pH from the current minimum of 7.0 to be in line with EPA's recommendations above.

As explained in the November 16, 2016 letter, EPA's recommendations are based on widely-accepted protocols such as "Recommended Standards for Water Works" (the "10 State Standards"). EPA has also recommended levels of corrosion control since December 2015 – and those levels have been successful in significantly decreasing the lead values greater than EPA action level. Phosphate has been used for decades in Flint, around the country, and around the world. This is not "experimenting" in Flint. In fact, the opposite is true. The "experiment" would be taking actions outside of these norms.

EPA's role is oversight of City and State efforts to ensure that the system provides residents with safe and clean drinking water. It is the responsibility of the City, specifically its public water system operators and staff, to meet water quality parameters (WQPs) set by the State. The Michigan Department of Environmental Quality (MDEQ) is the agency with primary and direct regulatory oversight of the City's water treatment operations. MDEQ sets the WQPs, and ensures that the system meets National Primary Drinking Water Regulations.

I want to close by emphasizing that throughout this process of system recovery, EPA has continued to coordinate open discussions with and provide technical support to the City and MDEQ. EPA has addressed all concerns raised in a transparent and consistent manner and has posted all key correspondence on our website at www.epa.gov/flint.

Thank you for your attention to this matter. Feel free to contact me with any questions at (312) 353-8320 or at korleski.christopher@epa.gov.

Sincerely,



Christopher Korleski
Director, Water Division

cc: Bryce Feighner, Director, Drinking Water and Municipal Assistance Division, MDEQ
Keith Creagh, Michigan Department of Natural Resources

References:

1. May 16, 2016 Flint Safe Drinking Water Task Force Recommendation on Maintenance of pH in Distribution System: https://www.epa.gov/sites/production/files/2016-05/documents/ftf_16-5_maintenance_of_ph_in_distribution_system_20160516.pdf
2. June 3, 2016 EPA Letter to Michigan DEQ, City of Flint Regarding Capability to Boost Chlorine: https://www.epa.gov/sites/production/files/2016-06/documents/epa_letter_to_mdeq_city_of_flint_concerning_capability_to_boost_chlorine_residual_levels_june_3_2016_0.pdf
3. November 16, 2016 EPA Acting Regional Administrator Response to Flint Mayor Regarding Disinfection and Corrosion Control: https://www.epa.gov/sites/production/files/2016-11/documents/mayor_weaver_letter_111616.pdf