



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



DAN WYANT  
DIRECTOR

November 9, 2015

Mr. Michael Glasgow  
Utilities Administrator  
City of Flint  
4500 North Dort Highway  
Flint, Michigan 48505

WSSN: #2310

Dear Mr. Glasgow:

**SUBJECT: Water Supply – City of Flint (City) – Compliance Communication  
Lead and Copper Rule Compliance Sampling Sites**

The City community water system is subject to the requirements of the Michigan Safe Drinking Water Act, 1976 Public Act 399, as amended (Act 399). According to Department of Environmental Quality (DEQ) records, City reports submitted to the DEQ regarding Lead and Copper Rule (LCR) compliance monitoring information have been certified by the City that all LCR compliance monitoring since 1992 has been conducted at sampling sites meeting the Tier 1 criteria listed under subrule 1c of administrative rule 710a (R325.10710a).

The City's recent efforts to electronically convert customer service line information and statements by some of the City's certified operators conflict with the information provided in the City's LCR compliance monitoring certification reports.

Therefore, the DEQ is hereby requesting the City provide additional information and documentation regarding all 324 historic LCR compliance sampling sites.

As of November 3, 2015, the City's electronic database of customer service connections listed 10,895 records of converted customer service connection index cards. The City has recently indicated it has a total of 29,072 customer service connections, leaving approximately 18,177 records left to be converted. These digital records include a listing of the service line material.

The DEQ has obtained a copy of these 10,895 digital records and cross referenced them with the addresses for the City's 324 historic LCR compliance monitoring sites. However, only 46 of the 324 sites were able to be matched at the current time. Of these 46 sites, only 6 sites contained information confirming the Tier 1 site criteria based on having lead service line materials. 14 sites were listed as having no available information (n/a), and require additional documentation to justify being designated as a Tier 1 sample site having a lead service line. The remaining 26 cross referenced sites were listed as having copper service line materials which directly conflicts with the City's LCR reports certifying these sites as Tier 1 based on the criteria of having a lead service line. The City needs to provide additional information to the DEQ demonstrating these sites meet the Tier 1 site criteria or we will assume they do not.

The City's remaining 278 historic LCR compliance sampling sites must also be reviewed and will require additional documentation to justify being designated as Tier 1 sample sites.

Our office has provided the enclosed table that lists all 324 of the City's historic LCR compliance monitoring sites, when each site was utilized, the City's certification information for each site, and information cross referenced from the City's customer service line database. The City can use the far right column in this table, labeled *Justification of Lead Service Line and Tier 1 Criteria*, to summarize the City's justification for certifying these sites as Tier 1 and having a lead service line. Any supporting documentation regarding the justification for each site needs to be provided as separate attachments.

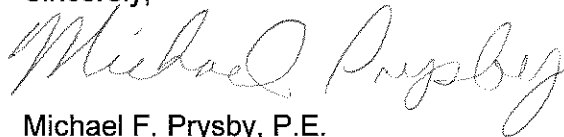
As a reminder, in accordance with subrule 1 of administrative rule 710a (R325.10710a), by January 1, 1992, the City was to have completed a materials evaluation of its distribution system to identify a pool of targeted sampling sites from which all first draw samples are collected. This evaluation was required to include information from:

- Special Monitoring for Corrosivity Characteristics
- All plumbing codes, permits, and records in the files of the building department or departments that indicate the plumbing materials installed within publically and privately owned structures connected to the water distribution system.
- All inspections and records of the distribution system indicating material composition of customer service connections.
- Water quality information that indicates locations which may be particularly susceptible to high lead or copper concentrations.

**The completed table and all supporting documentation must be provided to our office as soon as possible, but by no later than December 30, 2015, prior to the next LCR compliance monitoring period.**

Please contact me at 517-290-8817 or prysbym@michigan.gov at your earliest convenience to discuss this matter in more detail.

Sincerely,



Michael F. Prysby, P.E.  
District Engineer  
Lansing District Office  
Office of Drinking Water and  
Municipal Assistance

cc: Mr. Robert Bisnick, City of Flint  
Mr. Brent Wright, City of Flint  
Mr. Howard Kroft, City of Flint  
Ms. Natasha Henderson, City of Flint  
Mr. Jim Sygo, Chief Deputy Director, DEQ  
Mr. Stephen Busch, DEQ  
Mr. Adam Rosenthal, DEQ