

Internal Affairs
ORIGINAL INCIDENT
REPORT

ORIGINAL DATE Mon, Jan 25, 2016	INCIDENT NO. IA-DEQ-2016
TIME RECEIVED 0830	FILE CLASS 99009

WORK UNIT MSP EXEC DIV IA AICS		COUNTY Ingham	
COMPLAINANT MICHIGAN DEPARTMENT OF ENVIRONMENT QUALITY		TELEPHONE NO. 517-284-6712	
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INCIDENT STATUS Closed			

ALLEGED MISCONDUCT

SUMMARY:

I was asked by Capt. Greg Zarotney to investigate the Flint water crisis as it related to the potential misconduct of two Michigan Department of Environment Quality (MDEQ) employees. I met with Captain Zarotney on Monday, January 25, 2016, to discuss the details of the information known. Later that day, I met with Mr. Keith Creagh, MDEQ director; Ms. Jan Winters, Michigan Civil Service Commission director; Ms. Keri Lardie, Michigan Civil Service Commission; and Ms. Tami Eyer, MDEQ HR director.

The investigation revolved around the presence of lead in the City of Flint's water after their water source was changed from using water supplied from the City of Detroit to using water from the Flint River. It was alleged that lead leached into the water due to the lack of corrosion control treatment after the city's switch to the Flint River in April 2014. Further, it was alleged that the river water was corrosive and the lack of corrosion control was directly related to lead in Flint's drinking water. The Lead and Copper Rule (LCR) that MDEQ was responsible for implementing in Michigan mandated that all large water systems were required to complete corrosion control treatment steps or be deemed to have optimized control treatment.

The following MDEQ employees were interviewed: Amy Lachance, Mark Joseph, Kurt Swendsen, Joanne Rennaker, Bethel Skinker, Jim Sygo, and Richard Benzie. Principal interviews included Adam Rosenthal, Pat Cook, Mike Prsyby, and Stephen Busch. All employees denied any wrongdoing. All stated that they performed their job duties as required by state and federal regulations concerning safe drinking water and followed past practices that had been implemented in other water treatment systems around the state.

H: DRIVE ANALYSIS:

Ms. Eyer searched Mr. Busch's and Ms. Shekter-Smith's H: drive after it was provided to her by DTMB/Tim Lee. There was a document found on Ms. Shekter-Smith's drive that served as background information for the situation in Flint. The document, dated October 29, 2015, stated that MDEQ staff thought it was appropriate to call for the City of Flint to perform two six-month rounds of monitoring to demonstrate if the city was practicing optimal corrosion control treatment. The results from the two rounds of monitoring would be compared to the lead level in the source. Optimal corrosion control would be defined as having the 90th

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percentile in each of these monitoring periods to be lower than the sum of the lead in the source and the practical quantification limit for lead of 5 ppb. Since the Flint River had 0 ppb lead, the city would have been deemed optimal if its 90th percentile of lead was 5 ppb or less in two consecutive periods.

The document also stated that the Detroit based system was considered as having optimized corrosion control. Since the City of Flint had not been the supplier of water before, MDEQ did not require the city to maintain corrosion control for which it was not responsible. The City of Flint couldn't maintain something that it wasn't doing. It was believed that the City of Flint should have been afforded the same opportunity that all other large water systems were initially granted to demonstrate optimal corrosion control treatment through full scale monitoring. The document further stated that the first round of monitoring that ended in December 2014, resulted in a 90th percentile of 6 ppb lead. A 90th percentile lead/copper result of 6 ppb was not unusual and below the action level, and many water supplies in Michigan, and across the country, had 90th percentile levels of lead greater than this.

The statement by Steve Busch that stated that the City of Flint was practicing corrosion control was a "misstatement." What was meant was that the city was performing the required monitoring to determine whether or not they were "practicing optimal corrosion control."

The recommended/required stagnation period under the LCR was 6 to 18 hours. To accomplish this across the board, MDEQ policy was to recommend that the tap for use be simulated on the night before it was going to be sampled. If there was a lead service line in the house, then a first draw sample under this condition would not contain water that had sat stagnant for some time. The instructions provided by MDEQ provided for consistent sampling protocol that was easily followed by the homeowners and resulted in samples collected meeting the legal requirements of the LCR. The LCR was intended to assist water suppliers with evaluating their treatment process and the effects of the water on plumbing systems, not as a tool to assess individual exposure.

The document stated that if the EPAs interpretation was correct and the City of Flint was required to maintain corrosion control, and should not have been allowed to switch sources without maintaining corrosion control, this was not done. All indications were that the protective coatings that were in place as a result of treated water received from Detroit had been eroded and that lead leaching had increased during the time that there hadn't been treatment, and that was a mistake. However, MDEQ staff acted in good faith and believed that the LCR was being implemented properly. The LCR established a mechanism for a new supply, which was what MDEQ considered the Flint River to be, to conduct two six-month rounds of monitoring to determine whether or not the supply could be deemed optimal. The LCR did not anticipate that a system serving over 50,000 residents would disconnect from a regional supply to become its own supply with a new source and different treatment methods. It was these circumstances for which MDEQ employees were sincerely applying regulations as they interpreted them to ensure compliance and public health protection.

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There was nothing remarkable found on Mr. Busch's H: drive.

EMAIL ACCOUNT ANALYSIS:

The email box for Mr. Busch had thousands of emails in his email box, some of them dating back to 2000. To the best of my ability, I searched his email box for information that would impact this investigation. I found the following:

March 26, 2013: Mr. Busch noted that using Flint River as a water source would pose an increased microbial risk to public health, and pose an increased risk of disinfection by-product (carcinogen) exposure to public health. This email was posted on many news media sites.

March 31, 2014: Mr. Busch sent Mr. Prysby and Mr. Rosenthal the link for the LCR pertinent to Flint.

May 30, 2014: Email to Mr. Busch and Mr. Prysby about a citizen complaint about the quality of Flint water after switching to river water. The resident said he knew 20-30 people who had infections and rashes from the water.

June 20, 2014: Email to Mr. Busch and Mr. Prysby by Ms. Jennifer Crooks (EPA) summarizing the incident in Flint. It noted that the EPA began receiving complaints in May 2014 about the quality of the drinking water, shortly after Flint began using the Flint River as their water source, including rotten egg smell, swamp water smell, and people developing rashes. The email noted that Ms. Crooks had discussed the situation with Mr. Prysby and Richard Benzie. Analysis was done which showed some detects of regulated contaminants but no exceedances.

August 15, 2014: Mr. Rosenthal notified the City of Flint that the water samples were "confirmed fecal positive" and a boil water order needed to be provided to the public.

August 18, 2014: An email to Mr. Busch from a concerned resident in Flint regarding water quality and said that a dog had died because of it.

October 13, 2014: Email involving Mr. Prysby and Mr. Busch regarding General Motors' decision to stop using water from the Flint River until Flint started treating their water or reduced their chloride concentration. Mr. Prysby stressed the importance of not branding Flint's water as corrosive from a public health standpoint simply because it did not meet a manufacturing facility limit for production.

October 14, 2014: A Flint resident submitted a complaint via email about high drinking water costs and the poor water quality since switching to the Flint River. The resident said her water was brown, frequently had

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large visible particles floating in it, and smelled like an over-chlorinated swimming pool on some days and pond scum on other. Ms. Crooks from the EPA responded with a cc to Mr. Prysby and Mr. Busch. She told the resident that MDEQ was aware of the multiple complaints and was working with Flint on the issues.

January 20, 2015: Mr. Prysby sent an email regarding calls received by the public complaining of Flint water.

February 2015: Email between Mr. Busch, Mr. Prysby, and Ms. Crooks (EPA) regarding Ms. Walters' high lead levels. Ms. Crooks noted that the lead level found was 104 ppb which was very concerning since she had two children under the age of 3. Mr. Prysby said that the sample might be a stagnated sample and said that the other samples from the monitoring were below the action level. The City of Flint needed to take further action to help address Ms. Walters' concern. Mr. Busch responded that Flint was meeting the 90th percentile and he wasn't sure why the EPA saw that one sample as a big deal. Mr. Del Toral was also included in a later part of the email chain. He discussed that when lead values were as high as Mr. Walters, then it was likely due to particulate lead, which was a normal part of the corrosion process and common in all systems. Pre-flushing the taps, like MDEQ had been instructing residents to do, cleared the particulate lead out of the plumbing and biased the results low by eliminating the highest lead levels. He said that higher levels of PO₄ (orthophosphates) seemed to reduce the amount of particulate lead. Mr. Del Toral said that he knew that Detroit was using PO₄ for the LCR, and wondered what Flint was doing to have optimized corrosion control treatment. Mr. Busch responded that the City of Flint "has an Optimized Corrosion Control Program."

March 12, 2015: An email from the Genesee County Health Department to Mr. Prysby, later included Mr. Busch and Ms. Shekter-Smith, regarding the concern for Legionella. The email noted that in 2014 Genesee County experienced a significant increase of conformed Legionella illnesses relative to previous years and the increase closely corresponded with the timeframe to the switch to Flint River water. The email said that this was a significant and urgent public health issue and Legionella had been found in McClaren Hospital in Flint.

March 18, 2015: An email from EPA to Mr. Busch, Mr. Prysby, and Mr. Benzie about lead levels still being high at Ms. Walters' home (397 ppb).

April 23-24, 2015: An email exchange between Mr. Del Toral, Mr. Cook, Mr. Rosenthal and Mr. Busch. Mr. Del Toral wondered what Flint was doing, post Detroit, for corrosion control treatment. Mr. Cook responded that Flint was not practicing corrosion control treatment and water treatment officials were doing lead and copper monitoring for two consecutive six-month periods. The first round of samples from July through December 2014 had 90th percentiles of 6 ppb for lead. The second round of sampling from January through June 2015 was underway with approximately 20 of the 100 sample site results in with the highest lead result of 13 ppb. Mr. Del Toral was concerned since Flint had not been using corrosion control treatments since April 2014 and they had lead service lines. He was worried that the lead levels around Flint may have much higher lead levels than the compliance results indicated since there were using the pre-flushing method. He

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noted that Flint was required to have optimized corrosive control treatment because the two exceptions listed in the LCR were not met. Mr. Busch responded to Mr. Cook and Mr. Prysby that Flint was below the criteria for a large system and two rounds of monitoring needed to be conducted to determine optimized corrosion control. Mr. Cook felt the second guessing of how "we" interpret the rules was getting tiresome and they had always waited for two rounds of results before making that decision.

Mr. Busch wrote, "The only provision of the Rule which classifies the existing treatment of large PWSs as optimized for corrosion control is when the difference between the 90% pb-TAP and pb-POE is less than the lead PQL for each six-month period of the initial monitoring program. By definition, the PQL for lead is 0.005 mg/L; and the lead value for the source water used in this determination is the highest source water lead concentration. If this condition is met, then no study or testing is required. However States may consider the presence of copper in tap samples when determining whether the existing treatment is optimized." Mr. Busch wrote that he felt that condition had been met.

April 27, 2015: An email between Mr. Busch, Mr. Prysby, and Mr. Cook about Mr. Del Toral's concerns regarding Flint's corrosion control. Mr. Busch wrote that Mr. Del Toral based his concern on a single location which has/had lead service line and pre-flushing concerns which were not part of the current regulation. He wrote that Flint was "now" below the criteria for a large system and they technically did not have to do any of "this." Flint had only been through the one round of lead copper sampling and two rounds were needed to make the determination that Mr. Del Toral listed (optimized corrosion control). Mr. Busch stated that if Mr. Del Toral continued to persist, then Ms. Shekter-Smith or former Director Wyant might need to call EPA to address his "over-reaches."

June 25, 2015: An email between Mr. Rosenthal, Mr. Prysby, Mr. Busch, and the City of Flint. Mr. Rosenthal noted that there were 61 more lead/copper samples that needed to be collected and sent to the lab by the end of June 2015. The email stated that as of "now" there were 39 results and Flint's 90th percentile was over the action level for lead.

August 3, 2015: Email from Ms. Shekter-Smith to Mr. Busch and Mr. Cook regarding a summary of the conference call with EPA on July 21. There was a bullet point mention of sample size being reduced from 100 to 60 based on population changes. MDEQ asked for EPA opinion on whether the regulations allowed for the study requirement for Flint to be waived if MDEQ had Flint start pH adjustments and adding phosphates. Region 5 EPA said they would look into it and get back to MDEQ with an answer. All acknowledged that if Flint initiated corrosion control treatment and continued to evaluate the system to ensure optimization that these efforts would essentially equate to a corrosion control study. MDEQ explained that they did not treat the switch to Flint River water as a "new system," but as a new source and it was their understanding that two rounds of 6-month monitoring were needed to characterize the water quality. They didn't know what was optimized until those two rounds of 6-month monitoring were completed. Region 5 explained that they have

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talked about the interpretation of regulations and believed that systems that have been deemed optimized need to "maintain" corrosion control and agreed to provide supporting regulatory citations for the language about maintaining corrosion control. Lead compliance sampling procedures in the state of Michigan complied with Federal Safe Drinking Water Act (SDWA) requirements which called for a minimum of six hours during which there was no water used from the tap the sample was taken from. MDEQ was not interested in changing its position on pre-flushing until new regulations come out. They also pointed out that the pre-flushing instructions were not requirements, but suggestions. The Michigan pre-flushing instructions were developed as a way to ensure that sampled faucets were not stagnant for an excessive period of time beyond the targeted six hours (i.e., rarely used faucets or when a homeowner has been gone for an extended period of time).

August 17, 2015: Mr. Busch sent an email regarding the January through June 2015 monitoring period. The city was in compliance with the 15 ppb action level for lead (it was 11 ppb), but the results of the monitoring could not be deemed to provide fully optimized corrosion control treatment. There were 60 samples collected and six samples above the action level.

September 2, 2015: An email involving former MDEQ employee Mr. Brad Wurfel, Ms. Shekter-Smith, Mr. Busch, Mr. Prysby, and Mr. Benzie. It was a response to Virginia Tech testing Flint homes for lead. The email said that the MDEQ testing results, obtained from two separate rounds of testing over the past year, concluded that the mean average of lead in Flint drinking water met state and federal safe drinking water standards. But the state was "pushing" Flint to optimize its water where it would address additives that could minimize the extent to which the water interacted with lead plumbing in homes.

September 8, 2015: Email from Mr. Wurfel responding to a media inquiry. Mr. Busch was cc'd on the email discussing testing done by Virginia Tech. The email stated that while the state appreciated academic appreciation in the discussion, offering broad, dire public health advice based on some quick testing could be seen as fanning the political flames irresponsibly. The concern was not the Flint water source but the high number of homes in Flint that had lead pipes or lead service connections.

September 11, 2015: Email from Ms. Shekter-Smith noting that the letter had been sent to Flint to begin using phosphate treatment and they had until the end of the year to begin a treatment plan. The city needed a construction permit to install treatment and they had not yet applied for such a permit. Ms. Shekter-Smith said that the "ball's in their court," referring to waiting for Flint to submit the permit.

September 21, 2015: Virginia Tech researcher Marc Edwards said that Flint did not have an approved lead sampling pool. Only 13 of the lowest lead sampled homes from 2014 were resampled in 2015. The homes having high lead levels in 2014 were not asked to be resampled. In the original 71 samples that Flint submitted late (in 2015), the lead 90th percentile was exceeded and MDEQ took the initiative to invalidate two

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samples dropping Flint below the action level. Flint was supposed to have gotten 100 samples (like in the first round of monitoring) but only had 69 and Flint officials said that after a conference call with MDEQ the sampling size was reduced to 60.

October 14, 2015: Email involving Mr. Rosenthal, Mr. Prysby, Mr. Busch, and Ms. Shekter-Smith with the results from the two monitoring periods.

November 4, 2015: Mr. Prysby sent an email to the City of Flint attaching the permit authorizing installation of the corrosion control treatment system at the water treatment plant; Mr. Busch was cc'd. The permit was issued in October 2015. The document stated that orthophosphate was the appropriate corrosion control methodology for Flint.

Ms. Shekter-Smith also had thousands of emails in her email account. I did not find anything further besides what was found in other documents provided to me that was pertinent to my investigation.

CONTACT WITH MS. AMY LACHANCE:

I met with Ms. Lachance on February 3, 2016, in the Grand Rapids State Office Building where the MDEQ offices were located. Ms. Lachance was a supervisor for the Grand Rapids and Kalamazoo Districts and Mr. Busch was her colleague. I wanted Ms. Lachance to provide me with background information on what a district supervisor's job duties were and to explain the role of the Office of Drinking Water and Municipal Assistance (ODWMA) in enforcing the SDWA and LCR. Ms. Lachance was very helpful and answered my questions. Ms. Lachance said that she relied on her staff to bring her issues and she would provide direction on those issues. She met with other district supervisors on a regular basis in efforts to apply consistency throughout the state respective to making public water systems safe for public consumption. Ms. Lachance and I discussed how coatings built up over the years that protected the pipes from leaching contaminants in the water. She would never have believed that the coating that took years to build up could be reduced over 18-24 months, the amount of time the City of Flint was going to use the Flint River as a water source before going online with the Karagondi Water Authority. Ms. Lachance didn't know all the details related to the Flint water crisis or to Mr. Busch's actions, but she did not feel that what he did would have been any different than what she would have done at that time or what was usually done when deciding if a system had optimal corrosion control.

Ms. Lachance said that to determine if a water system was optimized, two six-month monitoring periods were completed. She would have determined the actions to take based on the parameter samples pursuant to EPA regulations. Ms. Lachance said that normally lead wasn't a huge concern with water systems like other more common contaminants like E coli. Ms. Lachance and I discussed the LCR and what the 90th percentile meant. She said that for a new water plant to determine whether or not a system had optimal corrosion control treatment, she would conduct two six-month monitoring periods and come up with a treatment plan after that.

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She said that MDEQ monitored water treatment plants and were not responsible for replacing service lines and pipes. I asked if she felt it was reasonable to assume that there would be contaminants or lead concerns when switching from a water system that was utilizing corrosion control to a system that was not, but she couldn't say for sure since each individual water system was so unique. She again said that she would never have predicted that the coatings would have disintegrated in the short time that Flint River water was going to be used as a source. Ms. Lachance confirmed that pre-flushing before providing a water sample was part of MDEQ guidelines and was consistently used, at the time, across the state.

I asked Ms. Lachance if she felt that the reduction of staff over the years affected how she did her work. She said yes, and when the state offered early outs a couple of years prior, a huge knowledge base left MDEQ. She talked about how the staff that she had was able to minimally enforce the regulations they were mandated to track and reported the results as required. We discussed the sampling size of 100 versus 60 and she didn't have any reason to believe that the sampling that was done in Flint was not done properly. She also talked about how lead levels increased temporarily when pipes were serviced and she had heard that Flint had a very high number of cold weather water breaks resulting in a lot of work being done on the pipes. Ms. Lachance agreed that most water systems utilized a high number of lead pipes or lead service lines and were in the process of replacing them. We discussed how the city of Lansing took something like 7 to 10 years to replace all the lead pipes in their water supply system.

INTERVIEW MR. MARK JOSEPH:

I interviewed Mr. Joseph on February 10, 2016, at approximately 9:58 a.m. at the MDEQ building in Lansing. The interview was digitally recorded. Mr. Joseph's supervisor was Mr. Busch. Mr. Joseph was an ODWMA employee and had been in that position for about 10 years, but had 18 years with MDEQ. He was responsible for providing support to community water supplies in Livingston County and Ann Arbor, including being involved in inspections, testing, distribution, and to enforce the state and federal regulations pertaining to safe drinking water. Any modifications to a water system required permits from MDEQ and he stayed very busy with his job duties. I asked if he worked with EPA a lot and Mr. Joseph said not really, only if a complaint was received regarding a water supply in his area. I asked how he interacted with Mr. Busch to do his job. Mr. Joseph stated that he worked independently as a senior level status. Normally, Mr. Busch became involved if there was a problem or there was a situation that had never been dealt with before. Mr. Joseph said that he would also consult with his counterparts like Mr. Prysby. If a water supply was not responding to requirements or recommendations, then Mr. Busch would become involved.

Mr. Joseph didn't work with Genesee County and said it was Mr. Prysby's area to cover. We talked about the switch to the Flint River. I asked Mr. Joseph if there was a group discussion about that, but he said it was Mr. Prysby and Mr. Busch that worked on that and he was not involved with the Flint water supply or the switch to Flint River as a source. Mr. Joseph said that it was a very complex project. He was aware of water quality concerns from day one that had to do with aesthetics like smell and taste. It was his understanding that the

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aesthetic concerns were trying to be fixed using chlorine and then there was the disinfection byproduct problem. There was also the issue with lead. We discussed how the Flint River and the water supply system hadn't been used except for a backup system for many years. I asked if there was any concern from his perspective on doing the two six-month monitoring periods prior to implementing corrosion control. Mr. Joseph said that he didn't have any large water supplies in the areas he was responsible for until recently when Ann Arbor became part of his area of responsibility. He said that he would follow the rules in conjunction with input from the analyst (Adam Rosenthal) to solve problems. Mr. Joseph said that no one wanted a public health issue.

I again asked Mr. Joseph about the two six-month treatment plans, wondering if it was a normal process to follow. He said that he hadn't looked at the rules in a long time because he didn't have large water systems in his responsibility area (except for the recent acquisition of Ann Arbor). He had never seen a switch before like what happened in Flint, going from one source to another. Mr. Joseph said that if there was a problem with a smaller system, the rules were written that two six-month monitoring rounds would be completed. He said that hindsight was 20/20 and his perspective had changed since seeing what happened in Flint. Mr. Joseph said that if there was a contaminant detect, then increased monitoring was required to see if the contaminant went away or if further treatment was needed. It wasn't an overnight process. I asked what increased monitoring meant and Mr. Joseph said that Flint had been on reduced monitoring because they hadn't had any issues with lead (below the 90th percentile) in previous years. When a contaminant was detected, then the monitoring would increase and would go back to standard monitoring. For example, reduced monitoring might be 50 samples and increased monitoring would be 100 samples.

I asked if it was reasonable that Flint, when switched from Detroit and using a system with optimized corrosion control, had high lead levels when there was no optimized corrosion control. Mr. Joseph said that he didn't have a lot of history with that and didn't have any knowledge of Flint's treatment plant. I asked if the optimized corrosion control treatment should have continued after leaving Detroit and Mr. Joseph said it depended on the size of the system. It was hard for him to give me a good answer because he didn't know what Flint's treatment scheme was. He said the water was a new source, but it depended on the treatment scheme Flint was using, and if there was treatment already in place that prevented corrosion control then maybe not. He couldn't answer my question without knowing what Flint's treatment scheme was. Mr. Joseph discussed when Alma/St. Louis made substantial changes to their water system after they switched source water. St. Louis never treated their water but Alma did. St. Louis was undergoing two six-month rounds of monitoring to determine optimized corrosion control. I asked Mr. Joseph what he would do if there were high lead levels in their first round of monitoring. He talked about the onus being on the water treatment systems and he would work with them to rectify that. His job was to work with the water treatment systems to resolve issues.

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Mr. Joseph and I discussed the LCR about the requirement to have optimized corrosion control. He didn't really pay attention, prior to the Flint water crisis, about the optimized corrosion control issue. He hadn't been trained to look at it. The rules were hundreds of pages long and the ODWMA program was so busy. Mr. Joseph said that many times they learned as problems arose. Now that Mr. Joseph had Ann Arbor, he would look at the requirements for large systems. If there was a continual problem, he would handle that himself, talk with the water treatment specialist (Adam Rosenthal), and address it up his chain of command if the problem continued or there was an unknown he hadn't dealt with before. He wouldn't normally involve EPA.

I asked Mr. Joseph if Mr. Busch, Mr. Rosenthal, or Mr. Prysby ever discussed the situation in Flint with him and he said no. I asked if there was anything that he was aware of that he was concerned about involving their actions related to the Flint water issues. Mr. Joseph said he was not aware of anything, especially since he didn't know Flint's treatment scheme. It would have been Mr. Prysby and Mr. Busch that would have made a decision on what to do based on the specifications, background data, and technical plans that were submitted against known standards and rules to verify that the treatment scheme would work properly and supply safe water.

Mr. Joseph apologized for being vague but said actions were so dependent on the system that was involved. He stated that Flint was an unfortunate issue and everyone would like to know more information about what happened. Mr. Joseph said that information wasn't being shared in MDEQ about what was going on. He knew two employees had been suspended and knew what the media had reported. I asked what kind of training he received on the LCR and he said he was told 18 years ago to read it and to ask questions if he had any. He said his program was so busy and they read the rules that pertained to what was being worked on at the time. Many times his goal was simply preventive maintenance with the water systems (filters, plumbing, tanks).

I asked if there was anything else I should know and Mr. Joseph said no. He firmly believed that no employee did anything intentional and that everyone at MDEQ had a respect for public health. Mr. Joseph said that Mr. Prysby was a 28-year employee who would not intentionally harm anyone. Mr. Joseph said he was being truthful with me during our interview. The interview ended at 10:44 a.m.

INTERVIEW MS. JOANNE RENNAKER:

I interviewed Ms. Rennaker on February 10, 2016, at 10:47 a.m. at the MDEQ building in Lansing. The interview was digitally recorded. Ms. Rennaker was Mr. Busch's secretary and had been since Mr. Busch took that position approximately three years prior. I explained the purpose of my interview. Ms. Rennaker did not have any information related to this investigation. She was not involved in the water situation in Flint except to proof the occasional letter that went out from the ODWMA office. I asked if she had any information that she found concerning. Ms. Rennaker said that Mr. Busch and Mr. Prysby worked very hard to address the issues in Flint. She did not see any red flags on Mr. Busch's part and hadn't talked with him

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since he had been suspended. It was her opinion that everyone was working hard to fix the problems in Flint and did not get the impression that anyone was trying to hide anything. I asked if she would be comfortable working for Mr. Busch if he came back to work and she said yes, she would be very comfortable and he always followed the rules. She didn't know how it got to the point where he was suspended because all she saw was him working many hours trying to fix the problem. I asked if she got any sense he was trying to not work with EPA and she said no. The interview ended at 10:54 a.m.

INTERVIEW MR. KURT SWENDSEN:

I interviewed Mr. Swendsen on February 10, 2016, at approximately 11:34 a.m. Prior to going on the record, Mr. Swendsen wanted to know if anything he said could be used against him and I told him no unless he lied to me. The interview was digitally recorded. He had been working in ODWMA for about 11 months and Mr. Busch was his supervisor. Prior to working in ODWMA, Mr. Swendsen was an analyst in another section in MDEQ for 13 years. He was responsible for Shiawassee, Gratiot, and Lapeer Counties, as well as four mobile parks in Clinton County. Most of the water systems that he was responsible for were small systems. Mr. Swendsen stated that he was not involved in any discussion or decisions involving Flint. He had not overheard anything or knew of anything that was concerning to him regarding the situation in Flint. I asked Mr. Swendsen if he would be okay if Mr. Busch came back to work and he said yes.

Mr. Swendsen said that he was still in training for his position. I asked what he would do if notified of high lead levels with one of his systems. He said he would talk to the senior engineers (Prysby, Skinker, Joseph) who had worked in the counties he was assigned prior to his involvement and he would talk to Mr. Rosenthal to figure out a plan. I asked if the two six-month rounds of monitoring that were implemented in Flint was a normal thing to do and Mr. Swendsen said that since he was new to the job there was no normal for him. He had not been involved in a system that exceeded the 90th percentile for lead. I asked how he had been trained to handle it and Mr. Swendsen said that the LCR was voluminous. The analyst would flag the test results and let him know. Mr. Swendsen said he would talk to more senior engineers to figure out the best course of action. He didn't have a knowledge base to know if the decisions made in Flint were appropriate. He said that when he took the position, Mr. Busch told him to be very familiar with sections six and seven of the LCR which encompassed the lead and copper rule.

He had nothing further to add relevant to this investigation and the interview ended at 11:43 a.m.

INTERVIEW MS. BETHEL SKINKER:

I interviewed Ms. Skinker on February 10, 2016, at approximately 11:59 a.m. at the MDEQ offices in Lansing. The interview was digitally recorded. Ms. Skinker had been an environmental engineer for over 20 years and was responsible for Ingham, Eaton, and Clinton Counties. Her supervisor was Mr. Busch and had been so for about three years. Ms. Skinker worked with a large water system in her area: the Lansing Board of Water and Light. Ms. Skinker was very helpful in answering my questions and explaining the water treatment

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process. I asked Ms. Skinker who/what she looked to if there was a problem with a water treatment system. She said she looked at the rules and spoke with her supervisor; it depended on the issue. I knew there was an issue with Lansing and lead about 10 years ago, but Ms. Skinker was in the Jackson office at that time and wasn't involved with the water system in Lansing. She said if there was an issue, she would handle it herself. She had 55 systems in her area. The engineer would address issues with the water system in their district. There were quarterly engineer meetings and various things were discussed. She didn't remember Flint ever being discussed in those meetings.

I asked Ms. Skinker if the City of Lansing wanted to switch their water source would two six-month rounds of monitoring being normal and she said yes. Ms. Skinker stated that the City of Lansing had optimized corrosion control. Flint was an existing system because they operated as a stand-by. She didn't know specifics of the move to the Flint River as a water source. I asked if it would be a normal question to ask when switching from Detroit to Flint on whether there was optimized corrosion control treatment plan in place. Ms. Skinker stated that she would think that would have been looked into, but the rule was not clear about it. When a water source switch took place, she would always look to the LCR to see what it said. Ms. Skinker stated the letter from the EPA (in November) said the LCR was not clear and there appeared to be differing possible interpretations of the LCR with respect to how the rule's optimal corrosion control treatment procedures applied to Flint which led to uncertainty. Ms. Skinker had not had a situation in her experiences that cause her to look at that portion of the LCR.

I told Ms. Skinker that there was a lead level determined to be 6 ppb after the first six-month monitoring and asked Ms. Skinker if she would have proceeded to a second monitoring period or if she would have done something after the first result. Ms. Skinker said that she would look at the circumstances on how the sample was drawn but noted that it was below the action level for lead. She would consider all factors before making a decision on what should be done. I asked if the process that was followed in Flint was a normal protocol and she said yes. We discussed the portion of the rule that stated a system deemed to have optimized corrosion control, and which had treatment in place, shall continue to operate and maintain optimal corrosion control treatment. Ms. Skinker said that the EPA memo said that the LCR was not clear on that requirement. Ms. Skinker said that monitoring had to be done to determine if a system was optimized. The water treatment operators were trained on what steps to take. There was coordination between MDEQ and the water system operators. She said that it could not be predicted what could go wrong.

I asked Ms. Skinker if it was reasonable to believe that there would be corrosives and/or lead in the water after switching from Detroit that was optimized to the Flint River that was not, and because the Flint system had not been used that much except for a backup system. Ms. Skinker said she would expect that there would be changes in water quality or reaction to piping but it could not be predicated right away to the extent of the changes and that was why the monitoring was done. I asked if it was normal to add chemicals as a preventative measure because the pipes hadn't been used much and she said that could be but she cautioned

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that MDEQ were regulators and she never wanted to over-regulate. Ms. Skinker said that she tried to move forward in a balanced way to implement the rules trying to be fair to everyone.

Ms. Skinker and I discussed the samples taken from a water treatment plant. Samples for lead were generally taken by a resident from their tap sources. I asked if MDEQ had any oversight over the piping or water once it left the water treatment plant. Ms. Skinker said that MDEQ could only recommend that lines needed to be replaced unless there was an imminent risk to public health. She wouldn't know if it was an imminent risk without conducting monitoring. She would have to conduct sampling and have data to support it to know if it was a risk. I asked Ms. Skinker about water systems having lead lines and she said that it was very normal all over the country for there to be lead pipes used to transport water. I asked if it was reasonable to think that lead would leach into the water solely based on the presence of a lead line and she said no, it depended on the aggressiveness of the water and no one would know the aggressiveness of the water without knowing the water quality (through monitoring). We discussed the water leaving the treatment plant not having lead in the water and the lead coming from the service lines/piping into homes. Ms. Skinker said that MDEQ did not have control over replacing the lines and the service lines were owned by the homeowner or by the city. In Lansing, they were in the process of replacing their lead piping/service lines and have been doing so for many years. Ms. Skinker said that she encouraged the City of Lansing to replace the lead lines and she didn't think MDEQ had the authority to ignore the city's ability or capability to replace the lines because it cost money. Replacing the lead lines was different from having optimized corrosion control. Having corrosion control might not be the solution to having lead service lines, but it did help.

I asked Ms. Skinker about the protective coatings that built up over the years in piping and wondered how the protective coating that was built up in Flint's pipes could have disintegrated in such a short period of time but she didn't know. I asked if it was surprising that it broke down that quickly and Ms. Skinker stated that she didn't have the data for Flint so she didn't know. She talked about where the sample was taken from and other factors that would have affected the samples like water softeners that removed minerals that coated the piping that would have made it corrosive. She said that the lead could have come from fixtures in the home or the service lines. Ms. Skinker said that the baseline was letting the water sit for six hours based on EPA procedures but if the samples were collected differently that could have an impact on the levels of lead. We talked about pre-flushing where the instructions provided to residents were to flush the system before going to bed letting the water sit in the pipes for at least six hours before drawing the sample. Ms. Skinker said that the data needed to be interpreted by where the sample was taken and the circumstances in how the sample was drawn. She didn't know the sample information from Flint since that wasn't her area and she was getting a sense from what was being reported in the media that perhaps some of the samples being compared was like comparing apples to oranges.

I asked if she had any concerns over what she knew Mr. Busch did involving Flint and Ms. Skinker said no. He was a good supervisor and she felt bad the way things ended up with him. Ms. Skinker and I talked about

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treating the water with chlorine after receiving complaints that the water in Flint was smelly and brown colored. Ms. Skinker said that treating with chlorine, or a disinfectant, was a requirement to treat bacteria. There were requirements for concentration and contact time with the water to kill the bacteria. I asked if the chlorine caused TTHM to be released that was treated with ferric chloride that caused lead to be leached. Ms. Skinker said that if one looked at the water from the river one would see turbidity. Before water could be delivered the water needed to be treated and the turbidity limits had to be reached. Ferric chloride was used to take out the suspended solids and was a normal chemical to treat the water. I asked if it was known to leach lead from lead pipes and Ms. Skinker said that it depended on the water quality. Ferric chloride was used in the East Lansing system which was being tested and monitored.

I asked what the process was if a complaint came in from a citizen about the water and Ms. Skinker said that she would call the water treatment system to investigate because they were the owner and operator of the system, and would know better what issues were going on with the water system. It might be that the water system just flushed a hydrant and she would ask the water system operator to call the citizen. Sometimes she would call the citizen to let them know what she did. I asked if she would mandate the water treatment system to do some testing and she said that the system would already have had a testing system in place. I asked Ms. Skinker what her opinion was, after receiving multiple citizen complaints in Flint about the water quality, if she would continue with the two six-month monitoring rounds or would she consider doing something more aggressive. Ms. Skinker said that was hard to answer because most engineers knew more about their system than she would, but she said it would depend on the system. Ms. Skinker said that in Lansing, citizens were complaining about rusty water caused by an old tactile iron water main that was not coated as well as other pipes in the system causing iron deposits in the water. She worked with EPA to discuss the situation and said that Lansing had phosphate corrosion treatment. The lead/copper levels were below the action level but EPA still wanted to recommend collecting samples from the house. The city collected a sample from the residence and there was no detect for lead. She said that if there were concerns about lead then it was a good idea to collect samples for a piece of mind. I asked about working with EPA and she said that she didn't work with EPA on a regular basis but as needed. Ms. Skinker said that she would work out issues with her supervisor and the water treatment plant.

I verified that Ms. Skinker did not read the LCR to mean that Flint had to have corrosion control treatment because Detroit had it without doing monitoring. Ms. Skinker said that before deciding what to do she would have looked at the rules and she would have assumed that the engineer (Prysby) for Flint did that because they initiated the corrosion control study with monitoring. I asked if there was anything else she thought I should know. Ms. Skinker said that she felt that Mr. Prysby and Mr. Busch did their best in the situation. She felt that they looked at the rules and the rules were really hard to understand. The LCR needed to be revised and rewritten and she didn't know why that had not been done since she felt that the EPA knew that the rule was not protective of public health. As regulators, MDEQ did not write the rule but they operated based on

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the rules. The whole situation was very unfortunate and information was being taken out of context. The interview ended at 12:42 p.m.

NOTICES OF INVESTIGATORY INTERVIEW COOK AND ROSENTHAL:

Because it appeared as if Mr. Cook and Mr. Rosenthal were directly involved in some of the decision making involving Flint water, I interviewed them as principals. I emailed Mr. Cook and Mr. Rosenthal's interview notices on February 16, 2016. They confirmed they received them via email on February 17.

OUTLINE FOR CONDUCTING AN INVESTIGATORY INTERVIEW:

The following was read to all employees interviewed as principals:

Employees shall fully and truthfully answer questions pertaining to job-related matters or to their conduct which is under investigation by the department when ordered to do so. Job related matters include on duty conduct, use of department materials, supplies, or equipment, and criminal conduct directly related to the employee's position in the department. Employees are not waiving any rights existing under law or collective bargaining agreements. Employees are subject to discipline, including discharge, for refusing to truthfully answer questions when advised that answers will not be used in any subsequent criminal proceedings and that refusal to answer will be considered insubordination.

An investigator designated by the Director to investigate complaints against employees has the authority of the Director to order employees to answer all questions related to the allegations. I, Lisa Rish, have been designated by Director Keith Creagh to conduct an internal, administrative investigation into issues surrounding how Department of Environmental Quality employees responded to information about the quality of water in the City of Flint.

- You are hereby ordered to answer all my questions fully and truthfully. _____ Initials
- Your failure to answer my questions fully and truthfully constitutes an act of insubordination for which discipline will result, up to and including discharge. _____ Initials
- Any self-incriminating information disclosed regarding the allegations set forth in this investigation will not be used against you in a criminal court of law. _____ Initials
- You have the right to representation during questioning and the presence of a representative will in no way jeopardize your continued employment. _____ Initials
- Do you understand what I have just explained to you? ____ yes ____ no _____ Initials

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- Do you have any questions concerning what I have just explained to you?
___ yes ___ no ___ Initials

INTERVIEW MR. ADAM ROSENTHAL:

Mr. Rosenthal was an Environmental Quality Analyst 12 for MDEQ. His position description stated that his position oversaw the environmental impacts of community public water systems within an eight county area. His duties were listed as analyzing water quality reports, operation and monitoring reports, determining if violations existed, and recommending a course of action for returning to compliance. I interviewed him on February 18, 2016, at 2:05 p.m. The interview was digitally recorded.

Present for the interview was his union representative, Mr. Howard Gordon. I confirmed that he received and reviewed his notice. I read the allegations listed on his notice. I confirmed that both Mr. Rosenthal and Mr. Gordon were ready to proceed with the interview. I read the Outline of Conducting an Interview described above. I gave Mr. Rosenthal an order to answer my questions fully and truthfully. I asked Mr. Rosenthal to initial by the corresponding box on the Outline that I had just read. Mr. Gordon questioned the wording of my asking questions during the interview that were job related matters that included criminal conduct and then advising Mr. Rosenthal that his answers will not be used against him in a criminal court of law. Mr. Gordon said that he could not advise Mr. Rosenthal on issues that involved criminal matters. I explained that the questions I would be asking were related to Mr. Rosenthal's job and he had to answer them, and his answers may be potentially considered criminal. Mr. Gordon asked if the wording was boilerplate from what I read MSP employees and I said yes, that I tailored the outline from what I read to MSP employees. Mr. Gordon said that he understood that information in the interview couldn't be used in a criminal court of law and he wanted to know if the information from my interview was discoverable by those conducting a criminal investigation where the information could then be used to trace back to an independent source that would allow the information to be used in a criminal investigation. Mr. Gordon had concerns about the Attorney General making statements in the media that a criminal investigation was going to be conducted and the actions by those involved in the Flint water crisis may be considered involuntary manslaughter.

Mr. Gordon wanted to know if my interview recording could be provided to the Attorney General. I explained that anyone could request a copy of my investigation through the Freedom of Information Act (FOIA) but it would be subject to redaction under the Freedom of Information Law. Mr. Gordon said that his concern was that Mr. Rosenthal's answers could be used by criminal investigators and they could take that information to find another source of the information besides my interview to be used criminally. He wanted to know if Mr. Rosenthal's statement would be immunized no matter what and felt that Mr. Rosenthal had a Fifth Amendment Right. Mr. Gordon said that he was speaking in general and knew that Mr. Rosenthal's position was that he did nothing wrong. I told Mr. Gordon that I was not able to answer his question. I didn't know if the criminal investigators would be able to verify what Mr. Rosenthal said (or other MDEQ employees) through another source.

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I reiterated that Mr. Rosenthal had to answer my questions if they were job related. Mr. Rosenthal initialed all the bullet points except the second one that stated failure to answer my questions fully and truthfully constituted an act of insubordination for which discipline will result, up to and including discharge. Mr. Gordon said that he didn't want Mr. Rosenthal to answer questions that could be used in a criminal investigation and then be subject to discipline for it. Mr. Gordon requested to take a break to talk with Mr. Rosenthal about it and I agreed, but I reminded Mr. Rosenthal that it was ultimately his decision. We went off the record at 2:17 p.m. and went back on the record at 2:19 p.m. Mr. Rosenthal initialed bullet point two described above against Mr. Gordon's advice. Mr. Rosenthal said that he had been advised by Mr. Gordon to plead the Fifth but he wanted to answer all my questions.

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Mr. Gordon wanted to add on the record that if any adverse action was taken against Mr. Rosenthal after his truthful testimony during our interview, the union believed in invoking Civil Service Rule 2-10, the Whistleblowers Protection, that protected the testimony from being used as a justification as any adverse action against Mr. Rosenthal.

The interview ended at 3 p.m.

INTERVIEW MR. PAT COOK:

I interviewed Mr. Cook on February 18, 2016, at approximately 3:18 p.m. The interview was digitally recorded. Present for the interview was his union representative, Mr. Howard Gordon. I confirmed that he received and reviewed his notice. I read the allegations listed on his notice. I confirmed that both Mr. Cook and Mr. Gordon were ready to proceed with the interview. I read the Outline for Conducting an Interview which has been attached as an external document. I gave Mr. Cook an order to answer my questions fully and truthfully. I asked Mr. Cook to initial by the corresponding boxes on the Outline that I had just read. Mr. Gordon did not have an issue with Mr. Cook initialing any of the boxes except for bullet #2 due to the concerns he spoke of during Mr. Rosenthal's interview. Mr. Gordon requested to take a break to talk with Mr. Cook about it. We went off the record at 3:22 p.m. and went back on the record at 3:24 p.m. Mr. Cook initialed bullet point two against Mr. Gordon's advice. Mr. Cook said that he was comfortable answering all questions during the interview.

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Mr. Gordon wanted to add on the record that if any adverse action was taken against Mr. Cook after his truthful testimony during our interview, the union believed in invoking Civil Service Rule 2-10, the Whistleblowers Protection, that protected the testimony from being used as a justification as any adverse action against Mr. Cook. The interview ended at 3:49 p.m.

CENSUS DATA:

I looked at the Census data from the United States Census Bureau web page. The population of Flint in April 2010 was 102,400. On July 1, 2014, the data was listed as 99,002. In a MLive article in May 2014, the population was estimated to be 99,763 in 2013.

NOTICE OF INVESTIGATORY INTERVIEW PRYSBY:

I emailed Mr. Prysby his interview notice on February 22, 2016. He confirmed that he received it on February 23. The date of the scheduled interview, February 25, all state offices were closed due to a winter storm. The interview was rescheduled for February 26 at 8 a.m.

INTERVIEW MR. MIKE PRYSBY:

I interviewed Mr. Prysby on February 26, 2016, at approximately 8:04 a.m. The interview was digitally recorded. Present for the interview was his union representative, Mr. Howard Gordon. I confirmed that Mr. Prysby received and reviewed his notice and the reason for the date change for the interview. I read the allegations listed on his notice. I confirmed that both Mr. Cook and Mr. Gordon were ready to proceed with the interview. I read the Outline for Conducting an Interview that has been attached as an external document. I gave Mr. Prysby an order to answer my questions fully and truthfully. I asked Mr. Prysby to initial by the corresponding boxes on the Outline that I had just read. Mr. Gordon did not have an issue with Mr. Prysby initialing any of the boxes except for bullet #2 due to the concerns he spoke of during the previous principal interviews of SEIU employees. Mr. Gordon had already spoken with Mr. Prysby about his concerns about the information from the interview being used in a broader application. Mr. Prysby said that he wanted to answer all my questions and initialed bullet #2 against Mr. Gordon's advice.

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Mr. Gordon wanted to add on the record that if any adverse action was taken against Mr. Prysby after his truthful testimony during this interview, the union believed in invoking Civil Service Rule 2-10, the Whistleblowers Protection, that protected the testimony from being used as a justification as any adverse action against Mr. Prysby. The interview ended at 9:26 a.m.

The memo that Mr. Prysby mentioned was dated November 23, 2004, and was authored by Mr. Benjamin Grumbles from the EPA. The memo discussed sample results from customer-requested sampling programs. The memo noted that the customer-requested samples may or may not meet the sample site selection criteria and samples collected that did not meet the criteria should not be used to calculate the 90th percentile. If a significant number of customer-requested samples were above the action level or lead then the state should re-evaluate the corrosion control used by the system.

INTERVIEW MR. JIM SYGO:

I interviewed Mr. Sygo on March 1, 2016, at approximately 10:04 a.m. in an office in the MDEQ building in Lansing in the Human Resources Section. I explained to Mr. Sygo that I was unsure of his involvement or knowledge of the details surrounding the Flint water crisis but was interested in his thoughts since he was Ms. Liane Shekter-Smith's supervisor. I explained that if there came a time where I felt I needed to stop the interview and issue him an interview notice, I would do so and continue the interview after that. He indicated that he understood. The interview was digitally recorded.

Mr. Sygo was a 33-year employee with MDEQ. He advised he came up through the department but not in the drinking water program. The drinking water program didn't fall under MDEQ's responsibility until around 1995. Mr. Sygo said that outside of being interim division chief when Ms. Shekter-Smith was removed from her position, he did not have a lot of involvement. He had oversight of the drinking water program but was involved in policy and some of the tougher decisions. He was not an engineer. He knew about water distribution and water treatment, but didn't classify as a professional in the drinking water program.

I asked if he had ever had the position that Mr. Mike Prysby or Mr. Steve Busch had held and he said no. I asked if he talked with Ms. Shekter-Smith or Mr. Busch about the water issues in Flint and he said he had on a number of occasions. Mr. Sygo stated that Director Wyant had a habit of going direct with Mr. Prysby and

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Mr. Busch. On occasion, Ms. Shekter-Smith felt like she didn't have all the information on what was going on and he told Director Wyant that she needed to be kept in the loop.

I explained some of the known factors: that Flint switched from using Detroit water to the Flint River as its water source, two six-month rounds of monitoring were done, and that citizens began to complain shortly after the switch was made. I asked Mr. Sygo at what point was he involved or how involved he was. He said that he didn't get very involved until August/September 2015. He said that he was off on family leave from the end of May 2015 until the second week of August 2015. I asked if, prior to May 2015, he knew there were complaints about the water in Flint. Mr. Sygo said yes, but it wasn't unusual to get complaints about the water when the pathway of water, particularly in a community like Flint where there was an oversized system due to the population that had left the area, was changed. Mr. Sygo said that Flint had a very old water system with some areas being over 100 years old. If there was not an adequate flushing system for the water there would be complaints about brown water.

He said that there were over 400 water main breaks during the winter of 2014. When breaks occurred, in any water system, it wasn't unusual to have a fecal or total chloroform problem and there were a couple of boil water advisories that were issues. Because of all the water breaks and the chloroform problem, it created a need to add additional chlorine to disinfect the system. As soon as chlorine was increased, then trihalomethanes (TTHM) became a problem. Mr. Busch was very good at predicting that would happen (based on a rolling average). Mr. Sygo stated that it would take a period of time to get the rolling average back down. Carbon filtration was also used and it took about a year to get the numbers down to where they should be.

I asked Mr. Sygo about corrosion control, wondering if he knew about that issue or was involved in those decisions. He said he wasn't really involved in the decision but was aware of the issue. The Flint situation had never really happened before where a major municipality left a water system where they were a purchaser of water to go onto a new source of water that they were already authorized to use on an emergency basis. Ms. Shekter-Smith talked to him about a couple of meetings she had with EPA and she even called him when he was on leave. EPA said that the only standard for communities over 50,000 was to keep the system on corrosion control and continue to provide orthophosphates. Flint was not providing any type of corrosion control because they were purchasing their water from Detroit. Ms. Shekter-Smith later told Director Wyant that they may have made a mistake.

Mr. Sygo said that when he got back from leave in August, he looked at the lead/copper rule and there was nothing in there that said that communities over 50,000 were required to stay on optimization of corrosion control. There were two different scenarios the LCR outlined. Mr. Sygo knew there was a conference call in July 2015 that discussed the issue but he was not a part of. Ms. Shekter-Smith called him after the call. EPA said that they would consult with their legal counsel and get back with them but they didn't do that until the

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memo was issued on November 3. In August, Mr. Sygo said that he agreed with Ms. Shekter-Smith that a letter should be sent to the City of Flint requiring them to optimize. He believed there was another discussion in February 2015 when Mr. Del Toral was working directly with Ms. Walters but hadn't involved MDEQ at all at that point. Mr. Sygo said that Mr. Del Toral alleged that the children in Flint were being poisoned with very limited data. Mr. Sygo felt that the statement should not be made until there was more data gathered and knew that MDEQ would not have said that.

I asked Mr. Sygo about the LCR and how it stated that large systems serving over 50,000 shall complete corrosion control treatment. There were two steps listed and I pointed out how Detroit was optimized and Flint was not. Mr. Sygo said that Flint was optimized with Detroit but was not optimized with the Flint River because they didn't have to be since they were utilizing the Flint River as an emergency source. Mr. Sygo stated that part of getting a program to be optimized meant doing sampling through the two six-month rounds of monitoring. I asked if two rounds of monitoring would be done for any system to determine what was deemed optimal and Mr. Sygo said yes. If the samples were 5 ppb or under, the system was considered optimized.

I asked if he was involved in the discussion after the first round of monitoring came in at 6 ppb, but then I remembered Mr. Sygo was on leave for part of the time. He stated that he didn't think the results came in until sometime around July. He said that if he had been at work and someone had asked him, then he would have told them to send the letter to Flint (requiring corrosion control). I asked why the second round of monitoring should have even taken place if Flint was going to have to be optimized anyway. Mr. Sygo said that if MDEQ made an error in judgment, the LCR did talk about two sets of samples. He said that 6 ppb was only 1 ppb over the level and that was a very small amount. He did feel that, based on that one sample of the 1 ppb difference, MDEQ would never say just forget it and not do anything more. Mr. Sygo stated that he agreed, in the perspective of time, it wasn't unreasonable to make the decision to look at another set of samples (from the second monitoring round). There was no question after the second set of samples that optimization was going to be required. Mr. Sygo stated that MDEQ, and the Auditor General agreed in their report, was following protocol. However, it was certainly arguable that when the results were received showing 6 ppb the letter could have been sent at that time.

I confirmed that Mr. Sygo wasn't involved in those decisions and prior to him being off on leave, he did not have any concerns with the way things were being handled in Flint. Mr. Sygo said that the LCR was a weird rule. We discussed the rule and Mr. Sygo said that Flint could not continue an optimized treatment plan that they didn't have. They did not have a corrosion control treatment plan in place when using the Flint River as a water source. To determine if Flint was optimized two six-month rounds of monitoring were required. I explained that Mr. Del Toral felt, along with others, that because Detroit was optimized then Flint should have maintained that optimization. Mr. Sygo said that the Flint River water was a different supply. He said that the

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EPA had now provided direction on how to interpret the LCR but at the time EPA even said that it was understood how the LCR could have been interpreted like MDEQ did when beginning two monitoring rounds.

I asked Mr. Sygo if in his conversations with Ms. Shekter-Smith or Mr. Busch adequately informed him of the situation in Flint. Mr. Sygo stated that Mr. Wyant was going direct with Mr. Busch but he felt he was apprised of the situation. He said that he was involved in many discussions, not necessarily about the LCR, but about evaluating whether the Karagondi switch could be done for such a price. I asked if he was concerned at his level about the decisions that Ms. Shekter-Smith, Mr. Busch, or Mr. Prysby were making and Mr. Sygo said, "None." He felt they were consistent with what he had read in the LCR. He had a lot of trust in the staff that worked under him.

When he returned from leave, he looked harder at the LCR and told Director Wyant that he felt he overstepped his bounds when making a statement to the press that MDEQ made a mistake. Mr. Sygo stated that he didn't feel a mistake was made with the rule. However, Mr. Sygo said that there was never a correction in the media after he had approached Mr. Wyant on at least five different occasions about it. Mr. Sygo felt that there was not a mistake made, but perhaps poor judgement was used. The November 3 memo from EPA substantiated that. The LCR was interpreted differently by Mr. Del Toral and the interpretation of the LCR by MDEQ was in the context of the regulation. Being a regulatory agency, MDEQ was not going to go out on a limb and interpret something differently. Mr. Sygo found that most "upsetful" about the after action group that the Governor appointed. It was easy to say how the LCR should have been interpreted when the outcome was known. He compared it to this: If he would have known how the game was going to turn out between the Broncos and the Patriots, he would have never bet on the Patriots (AFC Championship game).

Mr. Sygo said that he had known Ms. Shekter-Smith and had worked with her for 25 years. He hired Mr. Busch to be the district coordinator for Lansing. He was very bright and on the ball. Mr. Sygo said that the situation was unfortunate but he didn't think Mr. Busch, or Ms. Shekter-Smith, did anything that would be considered malfeasance or misconduct, or outside what the regulations required. He conceded that when the 6 ppb results were in after the first round of monitoring, the letter to Flint should have been generated at that time.

I said something clearly went wrong in Flint and noted that Director Creagh testified that orthophosphates should have been added after the 6 ppb result. I asked Mr. Sygo about that he said that it was hard to determine how much to add and there was typically a study conducted that took six months to a year. The LCR stated that water systems had 18 months to study an optimization treatment plan and then another year to implement it (actually 24 months). Mr. Sygo said that Detroit was providing water for a long time without providing any orthophosphate. The LCR went into effect in 1992 and Detroit had until 1996 to study it, and it wasn't until 2002 that Detroit began providing orthophosphates to a level that it was getting to the pipes in Flint and the other communities that purchased water from Detroit. Mr. Sygo stated that Detroit only started

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providing Flint water in 1967. From 1897 to 1967 Flint was using the Flint River as its water source. The pipes were not destroyed in those sixty-some years that the Flint River was being used and Mr. Sygo felt that a lot of "this" was overplayed as to what the crisis was in Flint.

Mr. Sygo stated that he wasn't trying to say that children weren't getting lead from the water. But if one looked at the LCR around the country, many kids were getting lead from the LCR. He sat on the technical advisory board in the City of Flint and he was in a meeting with EPA employees when Mr. Edwards from Virginia Tech and Dr. Reynolds, a pediatrician from Hurley, were present. Dr. Reynolds was slamming his fist on the table saying that "they" needed to keep this as a crisis and this was the only way that Flint was going to get money.

Mr. Sygo said that he felt there may be ulterior motives at play here. He looked at the data that Health and Human Services (HHS) generated from the blood lead levels in children and the numbers didn't add up. Dr. Mona (Hurley) predicated what the lead levels would be in Flint in certain zip codes in Flint but there was no data to back that up. I asked what the crux of the issue was and he felt that the aging infrastructure in Flint had a lot to do with it. He said that the oversized structure of Flint's water system was too large for its population. Flint used to have a 38 million gallon a day operation with city water and now Flint water was only serving 12 to 18 million gallons a day. Mr. Sygo said that was 20 million gallons less so cast iron pipes were half full that weren't operating all the time. There were many areas where water was sitting in the pipes, and not moving, because people weren't using the water. A little more corrosion was the result. When there were water main breaks, more chlorination was needed. There were long term issues with an oversized system.

I asked if corrosion control would help with that. Mr. Sygo said not so much with cast iron pipes but with lead service lines. He said that it was hard to find the lead service lines in Flint. There were 610 homes visited and only 43 lead service lines were found. Flint records were terrible and Mr. Sygo said that sometime in the 1970s the lead service lines were taken out from the curb box to the home. The lead service line was left from the curb box to the main, also known as the pigtail. EPA originally said that those conditions were not a Tier 1 site but had since allowed samples under such circumstances as a Tier 1 sample otherwise there weren't enough Tier 1 sites to do a lead coppering monitoring compliance.

Mr. Sygo said that he was all for protecting the kids. He also felt it was important to note that there was lead in the paint in many Flint homes and lead in the soil. The lead in the water could only account for 20% of the exposure for children nationwide. Many times lead exposure was from lead paint and lead dust from seasonal variances. Mr. Sygo said that the technical advisory committee did not want to explore lead from other sources. HHS had agreed to start checking homes for lead sources. Many water samples were not-detected for lead but had other sources of lead in the home. He wasn't saying that there were no areas in Flint that didn't have lead in the water, because there was. Construction in the area and water main breaks that shook up

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the pigtail pushed lead into the water that probably contributed to the high levels of lead that were being reported. Mr. Sygo felt that information was not accurately being reported in the media. He also felt that Mr. Del Toral and Mr. Edwards wanted changes in the LCR and Mr. Sygo felt that the changes were important. The EPA had been talking about changing the LCR for 10 years. Mr. Sygo said that the LCR was not an exposure rule but a rule to look at where problems were in the system. Where problems were found in the 10% above 15 then the health department should be following up to mitigate the lead in the area.

I asked Mr. Sygo if it could have been predicted that the water use would not be what it should be considering the aging infrastructure. He said that the reliability studies showed that the system could serve but what Flint needed to do was a quality evaluation of the system to install a proper type of flushing system to move old water out and new water would come in. MDEQ was working with Flint now in doing that. I asked whose responsibility to keep accurate records of where the lead pipes were in Flint and Mr. Sygo said that it was the city's responsibility under the rules found in Act 399 and SDWA. They weren't required to submit the records, only to have them. Flint was working on updating their records now including where the lead pigtails were.

I asked Mr. Sygo if there was anything he wanted to add. He felt that Mr. Busch had done a terrific job for MDEQ. He felt there was politics involved with the Flint water issue. Mr. Sygo said that he felt Ms. Shekter-Smith was "thrown under the bus" and Mr. Busch "was probably there, too." He found out that Ms. Shekter-Smith was being dismissed through a disciplinary conference that, as her supervisor, he was never contacted about. He felt it didn't follow the civil service process. Mr. Sygo said that after reading the Auditor General's report, he agreed that MDEQ staff was following protocol. He felt that the issue was "more created than anything else." He said that he wasn't downplaying the lead problems in Flint but there were also lead problems in Grand Rapids and Kalamazoo. He wanted to make sure the kids were being taken care of and Flint had safe water. He said that it would be very difficult to get all the lead out and it was important to mitigate the lead exposure as much as possible in all communities.

The interview ended at 10:46 a.m.

INTERVIEW MR. RICHARD BENZIE:

I interviewed Mr. Benzie on March 1, 2016, at approximately 11:07 a.m. in an office in the MDEQ building in Lansing in the Human Resources Section. I explained to Mr. Benzie that I was unsure of his involvement or knowledge of the details surrounding the Flint water crisis but was interested in his thoughts. I explained that if there came a time where I felt I needed to stop the interview and issue him an interview notice, I would do so and continue the interview after that. He indicated that he understood. The interview was digitally recorded.

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Mr. Benzie was chief of the Field Operations Section in the ODWMA and had been in that capacity since December 2014. Mr. Busch had reported directly to him since that time. Mr. Benzie used to be the chief of the Community Drinking Water Unit. I asked him if he was involved with Flint changing water sources in April 2014 and he said not really, he had taken part in discussion about whether Flint should even separate from the Detroit system. It was such a high level issue that, almost immediately, it went to the office chief's level. Most of the discussions were in Ms. Shekter-Smith's office and he was only there for some of them.

When he became Field Operations Section chief, Mr. Busch already had the ear of Director Wyant. Mr. Benzie said that Mr. Busch was in a position and a take-charge guy. Mr. Benzie said that he had some institutional knowledge based on his experience with public water supplies (since 1976). Mr. Benzie said he was copied on some emails. He told Mr. Busch that because he was going direct with Director Wyant for many things, to make sure he and Ms. Shekter-Smith were kept in the know so he wasn't blindsided. Mr. Benzie said that Mr. Busch was very capable.

I asked Mr. Benzie about the first round of monitoring and corrosion control, noting that he would have come into the unit around that same time. Mr. Benzie stated that he wasn't really involved in the discussions about corrosion control. They were past that point of doing something ahead of time by time he came to the section. He said that he felt that the protocol was being followed based on what had happened in the past when a regional water supply switched to a new treatment method. I asked if two six-month monitoring rounds were always done to determine what treatment was best and he said yes. I asked Mr. Benzie about the 6 ppb result after the first round of monitoring and asked if he was involved in making the decision to do a second round of monitoring. He said more or less Mr. Busch was going direct with Director Wyant about that. He said that he understood the reasoning for the second round. Mr. Benzie said that the first time he knew about it was when he was cc'd on an email Mr. Busch sent to EPA. He didn't disagree with what Mr. Busch did because that was what was normally done and it was what was done when the Detroit system was undergoing optimization.

Mr. Benzie remembered the first round included samples that exceeded the action level (in Detroit). Mr. Benzie said that Detroit didn't stop, they continued with the second round of monitoring and followed the rules. Some of the exceedances in the first round were not exceeded in the second monitoring round and some that were below exceedance in the first round were above in the second round. After the two monitoring periods, Detroit was made to do a study and then create a plan. He didn't think that Detroit started adding phosphates for another five years after the monitoring periods had ended. Mr. Benzie said that he felt the LCR was followed.

I asked Mr. Benzie about some of the emails he was cc'd on. There was an email in March 2015 about high lead levels in Ms. Walters' home. He was familiar with what I was talking about. I asked Mr. Benzie if he talked to Mr. Busch about the high lead levels. I verified that he was concerned about any lead level that was high but that didn't mean he equated the high lead level to mean that Flint needed to add corrosive control.

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Mr. Benzie stated that by the nature of the LCR, it relied upon samples that were collected by untrained and uncertified individuals. The water system was not allowed to make quality assurance adjustments and the results may cause millions of dollars in capital improvements to be made.

In Ms. Walters' instance, Mr. Benzie said that MDEQ was led to believe that there was an unusually long lead service line to her home that was being replaced. Also, the LCR allowed 10% of the samples to exceed the action level, no matter how high they were. After Flint, Mr. Benzie said that they were changing what to do with the high lead samples, but it wasn't a regulatory requirement. It was more of a do the right thing approach. Mr. Benzie said that in the last 25 years, MDEQ had been called on the carpet for overstepping their authority that wasn't listed in the regulations that the citizen didn't like that resulted in a call to the legislature. Mr. Benzie stated that often times MDEQ had been closely scrutinized by the Office of Regulatory Reform about implementing policies and practices that were statutorily mandated. Doing anything more than what the regulations stated would have been exceeding the authority they had been given under the rules. He said that EPA seemed to confirm that by their memo that stated there may be differing interpretations of the LCR and the LCR didn't anticipate that a city as large as Flint would separate and become a new system. The LCR did not state that Flint needed to maintain corrosion control because they didn't have anything to maintain. The treatment that was being provided wasn't Flint's, it belonged to Detroit that was 70 miles away in another water treatment plant with another water system. Mr. Benzie said that Flint was using a different source and different treatment, which included lime softening that could be optimal treatment for some systems. Detroit was using a different source of water and wasn't using lime softening.

Mr. Benzie stated that Flint met the action level of below 15 ppb, even with the 90th percentile at 6 ppb after the first monitoring round. If Flint had been adding a minor amount of phosphates from day one, this never would have been an issue. It didn't mean there wasn't a problem and people weren't exposed to lead that they shouldn't have been, but that happened in every water system under the right circumstances.

For example, if someone had a seasonal cottage and didn't flush their water before using, the water would have sat stagnated for a long time that would have dissolved everything in came it touch with including lead service lines and brass fixtures. The fact that Ms. Walters had high lead levels wasn't surprising because there were conditions where sampling would give high results. The sampling under the LCR was for evaluating the effectiveness of the treatment, not for health exposure levels. Different sampling was done for health exposures versus sampling under the LCR. The action level of 15 ppb was a treatment level to determine if the treatment was effective enough to minimize corrosion to the extent reasonably practical.

I asked why a second round of monitoring was even needed if Flint wasn't going to be able to be deemed optimized. Mr. Benzie stated that in hindsight, that was one of the things MDEQ could change. But at the time, that was what was done to determine optimal corrosion control for every water treatment system. But he

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said that he wasn't involved but was getting copied on emails. He didn't feel that Mr. Busch was doing something wrong and was following protocol as allowed in the rule.

I asked Mr. Benzie about Virginia Tech testing. He said that he felt that testing could be done at many homes that were using water from water treatment systems that had corrosion control and get samples with high lead levels. A city could have optimized corrosion control and still have high lead samples as long as their 90th percentile met the action level.

I asked if high lead levels came from the water and he said no. Mr. Benzie said that the water in the pipes right in front of the house generally contained no lead, there was no lead in the water in the groundwater, there was no lead in the treatment plant, and there were no lead components in water distributions system. When the water entered the pipe going into the home was when it started hitting things like lead service lines, brass fixtures, and copper plumbing with lead sauntering. Unless someone had put in plumbing in the last couple of years, there was likely lead in the plumbing fixtures. Mr. Benzie said that water was a universal solvent. He explained that by the time I drank all the water in my plastic water bottle I had during the interview, I likely ingested some plastic molecules of the bottle from the water. The way to fix lead in the water was to tell people to let their faucets run for five minutes before drinking or using after being stagnant for more than six hours.

I asked Mr. Benzie, even being taken out of the loop for most of it, if Mr. Busch was doing anything that was concerning to him and Mr. Benzie said no. There was nothing intentionally done to create a public health hazard. He stated that Mr. Busch was one of the finest employees he had ever worked with in his 40 years. He put in extra effort, did his homework, and was well informed on issues. Mr. Benzie felt that it was so unfair to Mr. Busch because of his position and the media scrutiny. Mr. Benzie said that similar things had happened in other cities and other states with no public outcry like had happened in Flint. He felt that the public was outraged over the emergency manager taking the control away from local officials. He was not trying to minimize anything and Mr. Benzie said lead was a problem. Even though Flint was meeting the drinking water standard, there was no acceptable level for lead.

I asked Mr. Benzie if there was anything else he thought I should know. We discussed who I had talked to and the things I had read. Mr. Benzie couldn't think of anything. Even knowing what he knew now, Mr. Benzie felt confident in Mr. Busch's abilities and decisions he had made. We discussed how Benton Township split from Benton Harbor and they did two rounds of monitoring before determining optimal corrosion control. Mr. Benzie said that Benton Harbor was deemed optimized for that size system and Benton Township did two rounds of monitoring pursuant the LCR.

I asked if it was as simple as just adding phosphates to provide corrosion control and Mr. Benzie said that it could be. However, a study was normally done to see if orthophosphates were the correct corrosion control.

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There were other things that might be used to be the optimal treatment. Just because Detroit used orthophosphates treating Lake Huron water didn't mean that the City of Flint would use orthophosphates to treat Flint River water.

I pointed out that Flint wasn't going to be using Flint River for that long to complete a study and make a recommendation for optimal corrosion control. Mr. Benzie agreed that was an argument that was made. I asked if testing could have been done prior to switching to Flint River water as a source. He said there were ways to simulate actual distribution before actually doing it, but that had never been done before and no other water system had been asked to do that. He again thought the lime softening would be coating the service lines and providing corrosion control to some extent and that monitoring would determine that. Every water quality was different so even though orthophosphates were used 8 out of 10 times, it wasn't always the solution. The interview ended at 11:35 a.m.

NOTICE OF INVESTIGATORY INTERVIEW BUSCH:

I called Mr. Busch on February 26, 2016, and left a message that I would like to interview him on Tuesday, March 1. A short time later, I received a call from his attorney, Mr. Brandon Zuk. Mr. Zuk advised that Mr. Busch was on vacation during the week of March 1 and asked to re-schedule the interview. We agreed on an interview date of March 7 at 2:30 p.m. Mr. Zuk mentioned that Mr. Busch was also seeking the advice of criminal and civil legal counsel. Mr. Zuk requested that all communications to Mr. Busch go through him. At 11:55 a.m. on Friday, February 26, I emailed Mr. Zuk the interview notice and the Outline for Conducting an Interview that I explained I would read at the interview. Later that day, at approximately 3:35 p.m., Mr. Zuk left me a message explaining that Mr. Busch would not be able to make the interview on March 7 because he needed time to talk to his criminal and civil defense attorneys and would not be available until March 14.

I called and spoke with Ms. Eyer on February 29 regarding the interview re-scheduling protocol used for MDEQ employees. She explained that employees were given one re-schedule for an interview and also reiterated that Mr. Busch was on a paid suspension and should be available for an interview at my request. I called Mr. Zuk shortly after and explained that I would email him a new interview notice for an interview scheduled for March 9 at 11:45 a.m. Mr. Zuk said that he would speak with Mr. Busch about it and expressed concern that Mr. Busch's attorneys would not have enough time to prepare for the interview. Mr. Zuk explained that it was likely that all three attorneys would want to be present for the interview. I told Mr. Zuk that Mr. Busch could have only one representative present for the interview.

On March 2, 2016, I received an email from Mr. Zuk's assistant, Ms. Patricia Nash, with an attached letter from Mr. Zuk. Mr. Zuk explained that Mr. Busch has had to retain civil defense and criminal defense counsel in addition to himself. Mr. Busch's civil and criminal defense lawyers needed time to interview Mr. Busch before submitting to an interview with me. Mr. Zuk stated that my request for an interview on March 9 was unreasonable and unfair because it didn't afford Mr. Busch's attorneys sufficient time to talk with him before

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the interview. Moreover, Mr. Zuk reiterated his request that all three attorneys be present for the interview. Mr. Busch intended to attend and cooperate in the interview, but the interview needed to be rescheduled to the week of March 21.

After consulting with Ms. Eyer and Captain Zarotney, I responded to Mr. Zuk on March 7 that I would re-schedule the interview for March 14 at 9 a.m. and emailed Mr. Zuk another interview notice for Mr. Busch. Mr. Zuk confirmed that he received my email and the notice. On March 10, Mr. Zuk contacted me and indicated that he and Mr. Busch would be present for the interview on March 14.

INTERVIEW STEPHEN BUSCH:

I interviewed Mr. Busch on March 14, 2016, at approximately 9:09 a.m. in an office in the MDEQ building in Lansing in the Human Resources Section. Present for the interview was Mr. Busch's representative, Mr. Brandon Zuk. Both Mr. Zuk and I digitally recorded the interview. I confirmed that Mr. Busch had read the interview notice that was emailed to Mr. Zuk. I read the allegations listed in the interview notice. I read the Outline for Conducting an Interview that was provided to Mr. Zuk prior to the interview. Mr. Zuk clarified that when I referred to the department in the interview outline, that I was referring to the Department of Environmental Equality and I said yes. He also wanted to clarify that when I referred to the director I was referring to Director Creagh and I said yes. I gave Mr. Busch an order to answer my questions fully and truthfully. I asked Mr. Busch to initial by the corresponding boxes on the Outline that I had just read and he did so. I confirmed that both were ready to proceed with the interview.

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Mr. Zuk indicated that they had nothing else to add and the interview ended at 10:46 a.m.

LIANE SHEKTER-SMITH:

Ms. Shekter-Smith was a 27-year employee and was reassigned to a different position within MDEQ on October 11, 2015. She was suspended from duty on January 22, 2016. She was terminated on February 5, 2016, after a disciplinary conference was held. Central to the disciplinary conference were the questions of

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why Ms. Shekter-Smith failed to properly implement the Lead Copper Rule, failed to establish effective working relationships with the EPA, and failed to properly implement the Safe Drinking Water Act by not mandating corrosive treatment for Flint.

On February 4, 2016, I spoke with Director Creagh regarding holding a disciplinary conference for Ms. Shekter-Smith prior to completing the internal investigation as it would be very difficult to obtain a statement from Ms. Shekter-Smith if her discipline conference results in termination.

On February 26, 2016, I spoke with Ms. Shekter-Smith's attorney, Mr. Brandon Zuk. I advised Mr. Zuk that I wanted to speak with Ms. Shekter-Smith for her thoughts on how MDEQ and it's employees handled the Flint water situation. Mr. Zuk said he would let Ms. Shekter-Smith know of my request. I spoke with Mr. Zuk on February 29 and he advised that both he and Ms. Shekter-Smith declined my request to be interviewed.

FORMER DEQ DIRECTOR DAN WYANT:

In a news release email dated October 19, 2015, Director Wyant said that it was apparent that staff made a mistake while working with the City of Flint by employing a federal protocol they believed was appropriate and it was not. However, he was convinced that program staff thought they were doing their job correctly and did not have the experience with the particular issue of corrosion control in cities of more than 50,000 people. Mr. Wyant stated that the issue in MDEQ was experience and protocol with respect to corrosion control.

I left a message on March 7, 2016, asking Mr. Wyant to contact me about the internal investigation involving MDEQ employees and the Flint water crisis. I did not hear back from him.

EXTERNAL DOCUMENTS:

- IA-DEQ-2016 Background Information
- Interview notice Cook, Rosenthal, Prysby, Busch (2)
- Email confirmation of interview Cook, Rosenthal, Prysby
- Position description Rosenthal, Busch
- Outline for Conducting an Interview Rosenthal, Cook, Prysby, and Busch
- Two inch binder provided from DEQ with documents related to Flint water crisis
- DEQ emails (62)
- DEQ policy
- Task force letter December 29, 2015
- Document on Shekter-Smith H Drive
- DEQ House February 3 hearing
- Recorded interviews for Joseph, Rennaker, Swendsen, Skinker, Rosenthal (2), Cook (2), Prysby, Sygo, Benzie, Busch (2)
- Text conversation with Mr. Prysby about interview date change (4)

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- Email with Brandon Zuk (3)
- EPA memo dated November 2004
- Census data
- MLive article about population
- Mr. Zuk letter
- November 2004 Grumbles memo

STATUS:

Closed

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