

I had a discussion with Miguel earlier this week, and it seems more apparent that Flint may have violated the LCR by not maintaining corrosion control after being optimized back in the early 1990's (since they were a customer of Detroit). MDEQ did not tell Flint to maintain corrosion control; instead, they treated the change in source water as a new system. I'll bet that the State will take this personally since they are responsible for the City of Flint's actions; which isn't a bad thing, but they may get VERY defensive. We can get into the weeds and explain in detail the intent of the rule and our interpretation of the rule and why the State must issue a TT violation, but in the end; the City, the State and we must move forward TOGETHER to correct this problem. We have resources in Mike Schock and Darren Lytle and Mike Wright; and we want to work with the State and the City to address ALL of the contaminant issues going on in Flint; bacti, TTHMs, Legionella, lead—from a wholistic approach to get some form of corrosion control working that doesn't minimize treatment for bacti or TTHMs. It doesn't make sense to discuss with the State what happened in the past; we need to move forward and work with the State as our partner; as the State sees the lead levels climbing, I don't see the benefit in rubbing their nose in the fact that we're right, and they're wrong.

If the State/City agree to issue public education on how citizens must properly flush their taps, I'm wondering what the benefit would be to force the State to issue a TT violation to Flint.

Regarding the State's protocol of pre-flushing, Miguel said earlier this week on the phone with me that pre-flushing didn't really make that much difference in the lead levels when the City was using Detroit water, since there was scale existing on the inside of the lead pipes. Now that the scale appears to be disappearing, the lead levels are starting to rise even with pre-flushing being conducted prior to sampling. Yes, the levels would probably be higher without the pre-flushing, but the City may exceed the Action Level even with the pre-flushing. Maybe the issue of the State's use of pre-flushing is moot at this point; perhaps we need to focus our energy on getting the State and City to accept our offer of Darren and Mike's participation in a wholistic approach to starting corrosion control and implementing public education for lead.

Jennifer

From: Bair, Rita

Sent: Wednesday, July 01, 2015 8:32 AM

To: Damato, Nicholas; Crooks, Jennifer; Deltoral, Miguel; Porter, Andrea; Kuefler, Janet; Shoven, Heather

Subject: RE: Flint Discussion

I have been trying to wrap my brain around all the Flint issues and developed the attached