

To: Bair, Rita[bair.rita@epa.gov]
Cc: Damato, Nicholas[damato.nicholas@epa.gov]; Crooks, Jennifer[crooks.jennifer@epa.gov]; Porter, Andrea[porters.andrea@epa.gov]
From: Deltoral, Miguel
Sent: Thur 6/25/2015 4:15:49 PM
Subject: Re: Interim Report on High Lead Levels in Flint
[Flint LCR Sampling Instructions 2015.pdf](#)

See responses below...

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From: Bair, Rita
Sent: Thursday, June 25, 2015 09:27 AM
To: Deltoral, Miguel
Cc: Damato, Nicholas; Crooks, Jennifer
Subject: RE: Interim Report on High Lead Levels in Flint

I have a few questions after reading the interim report. We are briefing Tinka this afternoon and having answers to these questions to the extent you can will be helpful. Thanks.

1. Page 1 "Recent drinking water sample results indicate the presence of high lead results in the drinking water" – How many homes? What data do we have to support this statement? From what you have in the report, it appears we have three homes [Personal Address / Ex. 6] last measured at 22 ug/l except for the residual in the water heater; [Personal Address / Ex. 6] last measured at 22 ug/l; and [Personal Address / Ex. 6] last measured at 42 ug/l. What other data do we have to say this is wide-spread?

MDT: The following homes that we know of have had sample results above the lead action level using first-draw samples, pre-flushed the night before for 3-4 minutes, and a limit on stagnation time of 6-8 hours:

[Personal Address / Ex. 6]

[Personal Address / Ex. 6]

[Personal Address / Ex. 6]

The samples from [Personal Address / Ex. 6] are N/A as they are from sequential sampling, and the water heater samples were from [Personal Address / Ex. 6] home at [Personal Address / Ex. 6] not [Personal Address / Ex. 6] and are also N/A, with respect to first-draw samples.

[The following rant is not directed at you]

The widespread high lead is my judgement based on a couple of decades of working with lead issues and I stand by it despite the limited data set from Flint. A simple application of scientific principles to the circumstances in Flint along with the limited data are enough to know that there is a problem there. They have had no corrosion control treatment in place for over a year now and they have lead service lines. It's just basic chemistry on lead solubility. You will have high lead leaching into the water where you are doing nothing to mitigate that. We don't need to drop a bowling ball off every building in every town to know that it will fall to the ground in all of these places. The fact that their sampling is designed not to capture lead (everything is fine) does not negate our scientific understanding of what is going on. The only reason we don't have more data is because the City of Flint is flushing away the evidence before measuring for it. They use pre-flushing and they limit the stagnation time to between 6-8 hours. A copy of the Flint sampling instructions is attached. A 3-4 minute flush in most cases would easily flush all of the lead away at most homes and since the lead portions of the service lines are mainly from the water main to the external shut-off valve, there is zero chance or close to zero chance that you will ever capture any of the high lead that dissolves within the lead service line in a one liter sample from the kitchen tap because the tap is too far away from the high lead sitting in the lead service line. Since the water hasn't be used in the home, the high lead hasn't moved toward the home because residents are told not to use the water after they pre-flush. The high lead levels we are seeing in Flint are mainly particulate lead, which is released sporadically in most cases, so unfortunately for Flint in their attempts to avoid capturing lead, these particles are being captured despite their attempts not to capture lead.

I understand that this is not a comfortable situation, but the State is complicit in this and the public has a right to know what they are doing because it is their children that are being harmed. At a MINIMUM, the City should be warning residents about the high lead, not hiding it telling them that there is no lead in teh water. To me that borders on criminal neglect. The only people that question the science are the ones that have a vested interest in not finding lead. When we look, we find it. When they look, they either don't find it or if they find it, they dismiss it as the resident's plumbing or use some other fabricated reason.

If there truly is a question in anyone's mind that there is a widespread lead problem in Flint, despite the painfully clear science, I am requesting that I be provided two assistants and that you folks allow me go and sample 100 homes in Flint without the pre-

flushing and then we can satisfy any doubts that anyone may have. I am not even asking for per diem and I'll pay my own hotel.

Sorry for the rant, but I am really getting tired of the bad actions being defended, the bad actions being ignored, and people trying to do the right thing are constantly being subjected to intense scrutiny as if we were doing something wrong. It's all of this 'don't find anything bad' crap at EPA that is reason I desperately want to leave. I am not happy to find bad things. It is completely stressful because it means children are being damaged and I have to put up with all of the political crap, but where these problems exist I will not ignore them. I truly, truly hate working here. EPA is a cesspool.

2. Pg 3, "Following the confirmation of the initial high lead results, USEPA Region 5 conducted two site visits" – I think we need a footnote that explains our rationale for why we went out there. What I remember Tom saying is that it was for the science and data that was available and could uniquely inform the NDWAC discussions. Does this sound right or could you provide more background on why?

There were actually two reasons. The first was to better understand what was going on in Flint for possible use at the NDWAC meetings and ultimately to inform the LCR rulemaking. The second was that I knew they were pre-flushing and I knew, based on the information that [Personal Address / Ex. 6] provided, that the State was either lying or was misinformed about the source of her high lead.

3. Pg 5, "Copies of the qualifications and experience for Michael Schock and Darren Lytle have been forwarded to MDEQ". I will ask Jen to find out if MDEQ has shared this with Flint yet. If they have, I think we should say that it has been shared with Flint in the final report.

Yes, if Jen can give me a date when MDEQ asked Flint, I will include that in the timeline/final report. Ultimately, it's up to Flint as to whether they want to accept the offer or not.

4. Pg 5, "#3 – Recent drinking water tests conducted at homes in Flint for lead that are not part of the compliance sampling pool have revealed high lead levels in the drinking water". Where did we get this data from? We may want to reference that in the report.

[Personal Address / Ex. 6] in response to her high lead found in her water was being a good neighbor and informed neighbors and friends who then requested that the City test their water.

5. Timeline #18 – you mention the Water Quality Report done by Veolia "Primarily focused on lowering TTHM". Was there anything in the report about lead?

No. There was nothing on lead at all in the report. The high lead levels were not known at the time that report was written. They did make some operational recommendations as well, but they were geared toward TTHM compliance. They did recommend adding polyphosphate, but that does nothing to control lead. It was recommended for sequestering the iron, due to the complaints about the discolored water.

6. Timeline #19 – No sources of lead found in the home... Have we communicated what we found – all plastic pipes – with MDEQ?

I am pretty I did, but everything has been a blur for the past couple of months so I can't definitely say that I did.

From: Deltoral, Miguel
Sent: Wednesday, June 24, 2015 2:05 PM
To: Poy, Thomas; Bair, Rita; Damato, Nicholas
Cc: Shoven, Heather; Porter, Andrea; Crooks, Jennifer
Subject: Interim Report on High Lead Levels in Flint
Importance: High

Attached is the interim report on the high lead levels in Flint, Michigan. Sorry to take so long on this. I am working as fast as I can on the final report. I am waiting on some additional information from Marc Edwards before I can finish the final report. The first doc is the signed memo with the external 'cc' folks. The second is the internal copy with the 'bcc' list and the third doc is the timeline of events up to date on the Flint water quality.

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