



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 10, 2014

Mr. Brent Wright
City of Flint Water Treatment Plant
4500 North Dort Highway
Flint, Michigan 48505

SUBJECT: Compliance Communication
Total Trihalomethane Operational Evaluation Requested

Under the Stage 2 Disinfectants and Disinfection Byproduct Rule, the City of Flint has been required to collect samples for the analysis of Total Trihalomethane (TTHM) and Haloacetic Acids (HAA5) at eight sites within the City's water distribution system. The City has completed two quarterly monitoring periods since changing its source water to the Flint River effective April 25, 2014.

Normally an Operational Evaluation Level (OEL) would be calculated in accordance with the Michigan Safe Drinking Water Act, Public Act 399, 1976, as amended, Administrative Rule 7196 (R 325.107196), each quarter once three quarters of results have been obtained and compared with the respective maximum contaminant level (MCL) for TTHM. Normally the calculation would be made as follows:

$$(2 \times \text{current quarter} + \text{sum of 2 previous quarters}) \text{ divided by } 4$$

As the City of Flint currently has only two quarters of data, the calculation has been modified as follows:

$$(2 \times \text{current quarter} + \text{previous quarter}) \text{ divided by } 4$$

The resulting OEL for each site is listed in the table below. All results are in parts per billion (ppb):

	TTHM			HAA5		
	5/21/14	8/21/14	Mod. OEL	5/21/14	8/21/14	Mod. OEL
DBP1 McDonalds 3719 Davison	162.4	145.3	113	64	43	38
DBP2 Liquor Palace 822 S. Dort Highway	111.6	112	64	52	40	33
DBP3 North Flint Auto 3302 S. Dort Highway	96.5	127.2	88	48	31	28
DBP4 University Market 3608 Corunna	106.4	181.3	117	55	24	26
DBP5 B&P Gas Station 2501 Flushing	75.1	196.2	117	38	17	18
DBP6 Salem Housing 3216 MLK Boulevard	82.2	112.4	77	41	25	23
DBP7 Kroger 5018 Clio Road	88.2	144.4	94	49	30	27
DBP8 Taco Bell 6204 N. Saginaw	79.2	118.3	79	50	37	31

As shown in the table above, even with this less restrictive modified method, six of the City's eight sites already exceed the OEL limit of 80 ppb for TTHM. In addition, the City's two other sites are both more than 95% of the TTHM OEL limit.

The MCL for TTHM and HAA5 is based on a locational running annual average for each site, essentially the average at each site over the four previous quarterly monitoring periods. However, with TTHM levels of this magnitude, it is likely the MCL will be exceeded for at least one of these eight sites from just three quarters of monitoring results. For TTHM, four quarters at the MCL of 80 ppb (4 x 80) would provide 320 ppb allowable. As an example, site DBP1 through just two quarterly monitoring periods has a total of 307 ppb (162+145), leaving only 13 ppb over two more quarterly monitoring periods to maintain compliance with the MCL.

Therefore, this office is requesting the City of Flint complete an Operational Evaluation in accordance with Administrative Rule 719I (R325.10179I). The Operational Evaluation Report shall be submitted to this office no later than November 28, 2014. The report shall not be limited in scope and shall include the following:

Examination of Treatment Operational Practices

- Changes in source water quality
- Treatment changes
- Storage tank operations
- Excess storage capacity
- Treatment problems that contribute to TTHM formation

Examination of Distribution Operational Practices

- Storage tank operations
- Excess storage capacity
- Distribution system flushing

The report shall also include steps the City could consider to minimize future exceedances.

Additional guidance on completing the Operational Evaluation Report, including a number of forms that can be used to gather and evaluate water system information is provided in the United States Environmental Protection Agency's (U.S. EPA) Operational Evaluation Guidance Manual. This document is available on the U.S. EPA's website at the following link:

http://www.epa.gov/ogwdw/disinfection/stage2/pdfs/draft_guide_stage2_operationalevaluation.pdf

Be advised, failure to submit an Operational Evaluation Report by this deadline is a reporting violation subject to Tier 3 Public Notification.

The OEL is an indicator of operational performance. The water system must take proactive steps to be able to comply with the MCL's for TTHM and HAA5. While it is recognized that removal of Total Organic Carbon disinfection byproduct precursors as part of the treatment process has performed above minimum removal requirements under the treatment technique, around 4 parts per million of organic carbon are still present in the treated water and may be leading to additional TTHM formation in the City's distribution system.

While health effects associated with disinfection byproducts contaminants are based on chronic exposure, the City has available alternatives that must be considered to achieve compliance with this drinking water public health standard.

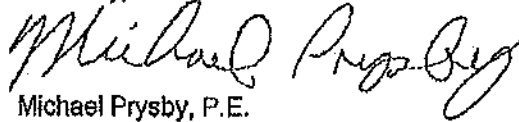
Mr. Brent Wright

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September 10, 2014

If you have any questions regarding this information, please contact me at the number below.

Sincerely,

A handwritten signature in black ink that reads "Michael Prysby". The signature is written in a cursive style with a large, stylized "M" and "P".

Michael Prysby, P.E.
District Engineer
Office of Drinking Water and
Municipal Assistance
Lansing District Office
(517) 290-8817

cc: Mr. Darnell Early, City of Flint
Mr. Daugherty Johnson III, City of Flint
Mr. Howard Croft, City of Flint
Mr. Robert Blincsik, City of Flint
Ms. Lane Shekter Smith, P.E., DEQ
Mr. Richard Benzle, P.E., DEQ
Mr. Stephen Busch, P.E., DEQ
Genesee Co. Health Dept.