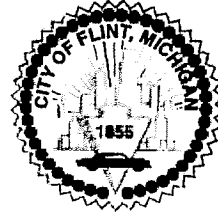
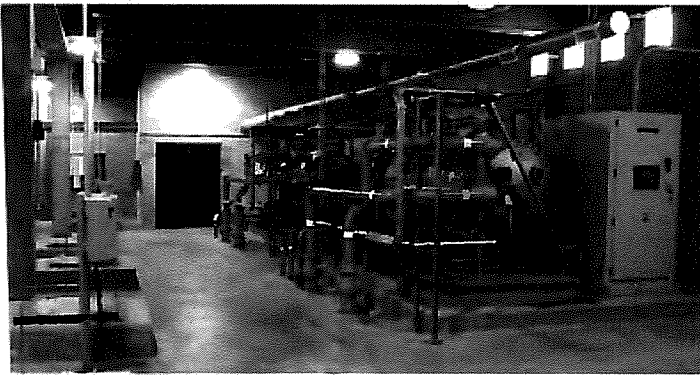

Operational Evaluation Report City of Flint



Trihalomethane Formation Concern

November 2014



Lockwood, Andrews
& Newnam, Inc.

A L E C C O R P O R A T I O N N Y



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EXECUTIVE SUMMARY

Environmental Protection Agency (EPA) and Michigan Department of Environmental Quality (MDEQ) regulations require that public water suppliers test drinking water quarterly throughout the distribution system for disinfectant by-products (DBP's). Two categories of DBP's, tri-halomethanes (THM) and halo-acetic acids (HAA5), are regulated and must be tested for. The City of Flint began operation of their water treatment plant (WTP) full time with the Flint River as the source on April 25, 2014. Since that time, two quarters of samples taken indicate that future violations are inevitable for total THM without some modifications to the water system. In response, the City hired Lockwood, Andrews & Newnam, Inc. (LAN) to complete this Operational Evaluation Report (OER) in conformance with EPA guidelines with the goal to determine the cause(s) of high levels of THM and evaluate possible solutions.

The EPA promulgated the Stage 2 Disinfectants and Disinfection By-Products Rule (DBPR) in January 2006 which set maximum contaminant levels (MCLs) for total trihalomethanes (TTHM) and HAA5 based on an annual running average, tested quarterly, for a given sampling location. The City of Flint reports levels from 8 sampling test locations. Of the two quarterly sampling cycles since Flint began operating the WTP full time, HAA5 levels have been acceptable but TTHM levels have been high at all 8 sampling sites.

According to the Stage 2 DBPR, the annual average value requires 3 quarters of sampling data with the most current period counting twice. Therefore, the City of Flint has not yet experienced a violation of the TTHM MCL because only 2 quarters of data have been obtained. However, levels recorded indicate the likelihood of an MCL exceedance later this year.

A number of issues have been identified as possibly contributing to the high THM levels measured.

1. Inefficient ozone system operation which has resulted in increased chlorine feed.
2. Sewer leak discovered upstream of intake causing high total Coliform levels, increased chlorine demand, and resulting need to increase chlorine feed.
3. Bypass stream around softening contributed to chlorine demand.
4. Unlined cast iron pipes in the distribution system contributing to chlorine demand.
5. Recirculating water in the distribution system due to less than ideal configuration of Cedar Street and West Side pump stations.
6. Broken valves resulting in stagnant water in some areas.
7. High chlorine demand in filters.
8. High THM formation potential (THMFP) in source water.
9. Less than optimal removal of THM precursors

ACTION PLAN

The City of Flint has signed an agreement with the Karegnondi Water Authority (KWA) to purchase raw water drawn from Lake Huron. The KWA system is currently under construction and expected to be operational by late 2016. The water supply from Lake Huron will have entirely different water quality characteristics from the Flint River and those characteristics are expected to yield drastically reduced DPB formation. With that, non-structural options to help reduce THM levels are much preferred over solutions requiring new construction. Therefore, two categories of actions have been devised: Stage 1 being actions that can be completed relatively quickly without major construction and Stage 2 consisting of either long term actions or solutions requiring major construction. The City has completed or intends to complete Stage 1 Actions by February 16, 2015, the week in which the next



quarterly sampling is to be done. Stage 2 actions are to be implemented only if Stage 1 actions are ineffective in adequately reducing TTHM levels and therefore Stage 2 is contingent upon the outcome of Stage 1.

Stage 1 – Immediate Actions

- Hire ozone system manufacturer to troubleshoot ozone system
- Bench scale jar testing
 - Match existing process and access possible areas of improvement
 - Simulate potential modifications to treatment process
 - Evaluate coagulation and flocculation polymer aid feeds to assist with TOC removal
- WTP operational changes
 - Discontinue softening bypass stream to reduce chlorine demand
 - Disinfection of filter beds to reduce chlorine demand
 - Possibly begin coagulation and flocculation polymer aid feeds to assist with TOC removal depending on bench scale test results
- Increase water main flushing efforts to minimize stagnant water
- Water system modeling to identify areas with high water age and potential solutions
 - Cedar Street Pump Station potential recirculation
 - West Side Pump Station potential recirculation
 - Storage tank volume use
 - Possible broken closed valve locations
 - Locations in need of flushing
 - Lower high water levels in storage tanks

Stage 2 – Contingent Actions

- Fix ozone system
- Start feeding coagulation and flocculation polymer aids to lower TOC, if not completed in Stage 1
- **Convert to lime and soda ash softening**
- Change disinfectant to chloramine or chlorine dioxide until KWA
- Install pre-oxidant feed at intake to optimize ozone disinfection
- Implement advanced treatment for THM precursor removal
- Increased main flushing based on water modeling results
- Continue valve replacements with water model assistance
- Emphasize cast iron pipes on water main replacement priority list



I. BACKGROUND

The City of Detroit Water and Sewer Department (DWSD) has historically provided drinking water for the City of Flint and Genesee County. In the late 1990's growing concern regarding the reliability of the DWSD supply prompted the City of Flint to upgrade their existing water treatment plant (WTP). Those improvements, defined as Phase I, were completed in 2005 and were intended to allow the Flint WTP to operate, using the Flint River as the source, for an extended period of time in the event that supply from the DWSD was temporarily interrupted. Additionally, the Phase I improvements set the stage for Flint to break free from dependence on the DWSD supply and water charges over which they had no control.

A. WATER SUPPLY TRANSITION

1. Detroit Water and Sewer Department (DWSD)

Until recently the Genesee County and Flint region had been provided drinking water by the DWSD. However, due to excessive cost increases and reliability issues with the DWSD system other options had to be explored.

2. Karegnondi Water Authority (KWA)

In 2010 the Karegnondi Water Authority (KWA) was formed for the purpose of developing a new water supply from Lake Huron to serve the region in lieu of the DWSD supply and the City of Flint elected to join. The KWA expects the new system which is currently being constructed to become operational in the fall of 2016.

3. Flint River – Interim Period

With a water supply agreement between Flint and the DWSD set to expire in early 2014 and the KWA system not expected to be operational until late 2016, the City of Flint decided to initiate operation of the existing WTP full time utilizing the Flint River as the interim water source. A variety of WTP improvements were necessary for the Flint plant to become a full time plant. For purposes of this report, Phase II improvements to the Flint WTP are improvements which have been made to allow the plant to operate full time with either the Flint River as the source or the KWA supply as the source.

B. TTHM PENDING VIOLATIONS

The calculation for determining if the MCL has been violated for TTHM is:

$$(2 \times \text{current quarter value} + \text{previous 2 quarter values}) / 4$$

Flint has completed tests for 2 quarters and therefore has not violated an MCL limit to date. However, the third quarter of sample data is likely to provide MCL exceedances at all 8 sampling sites. Test results are tabulated below.



TABLE 1 – 2014 DBP TEST RESULTS

Sample Location	TTHM			HAA5		
	1 st Qrt 5/21/14	2 nd Qrt 8/21/14	3 rd Qrt	1 st Qrt 5/21/14	2 nd Qrt 8/21/14	3 rd Qrt
3719 Davison - McDonalds	162.4	145.3		64	43	
822 S. Dort Hwy - BP Gas Sta.	111.6	112.0		52	40	
3302 S. Dort Hwy - Liquor Palace	96.5	127.2		48	31	
3606 Corunna - Taco Bell	106.4	181.3		55	24	
2501 Flushing - Univ. Market	75.1	196.2		38	17	
3216 MLK - Salem Housing	82.2	112.4		41	25	
5018 Clio - Rite Aid	88.2	144.4		49	30	
6204 N. Saginaw - N. Flint Auto	79.2	118.3		50	37	

TTHM MCL = 80 ug/l
HAA5 MCL = 60 ug/l

C. WATER TREATMENT PLANT RECENT IMPROVEMENTS & STATUS

1. Phase I WTP Improvements

Since 1965, the Flint WTP has remained a secondary or backup supply system to the DWSD primary supply. Typically the secondary supply for a public water system is expected to be needed only during emergency situations and normally is designed for short term operation such as providing the average daily demand for a few days. Conversely, Phase I improvements were designed with the intent to upgrade the Flint WTP in order to allow for an extended short term period (6 weeks) because of the perceived high risk that the DWSD supply would fail and remain out of service for an extended duration. Regardless, the Flint WTP was still intended to serve as a standby plant and as such the Phase I improvements lacked redundancies that would be required for a primary supply WTP.

2. Past Pilot Study & Testing

During design of the Phase I improvements a treatability study was completed by Alvord, Burdick & Howson, LLC (AB&H) in 2002. The Treatability Study evaluated the current treatment processes that are in place at the Flint WTP today with the Flint River as the source. The report recommended the following:

TABLE 2 – 2002 WTP TREATMENT RECOMMENDATIONS

Treatment	Purpose	Point of Application	Dosage (mg/l)
Sodium permanganate	Zebra mussel control	Intake	0.3
Ozone	Taste & odor removal, disinfection	Diffusor basin	1.5
Ferric chloride	Coagulation	Rapid mix	40
Coag aid polymer	Turbidity & TOC removal	Rapid mix	2.0
Floc aid polymer	Turbidity & TOC removal	Floc basin	0.05
Lime	Softening	Softening basin	175
Soda ash	Softening	Softening basin	52
Carbon dioxide	pH adjustment	Recarb basin	37
Media filters	Filtration	Na	Na
Chlorine	Disinfection	Filter effluent	1.0



Of the recommended items, zebra mussel control, coagulant and flocculation polymer aids, and soda ash feed have not been incorporated into the treatment process.

3. Phase II WTP Improvements for Full Time Operation

Phase II WTP improvements are those needed to convert the Flint WTP from a back-up supply to a primary supply plant. A number of improvements have already been constructed as they were necessary to operate full time, treating water from the Flint River. The improvements under the title of Phase II that have been completed or are nearly complete include upgrades to the lime sludge lagoon, the lime sludge lagoon decant and disposal system, decant pump station and force main, installation of mid-point chlorination before filtration, and upgrade of the electric feed sub-station.

Additional improvements to the Flint WTP that are to be completed to become part of the normal treatment process using water supplied by the KWA are:

- New oxygen and nitrogen storage facilities for the ozone system
- New coagulant feed system
- Electrical
 - Pump Station #4 upgrades
 - Plant 2 improvements
 - Filter press building feeder
 - SCADA and controls upgrades
 - Filter transfer pump station feeders
- Installation of the future raw water feed connection point for the KWA
- Pump replacements and VFD installation in the low and high service pump station
- Filter transfer pump station to Dort Reservoir
- Facility security improvements



II. SOURCE WATER EVALUATION

A. DATA ANALYSIS

Based on past data collected and the 2002 Treatability Study by AB&H, the Flint River water quality varies seasonally with higher hardness and alkalinity experienced in the winter. Higher magnesium concentrations are also experienced in the winter, adding difficulty to the settling process due to neutrally buoyant floc. General water quality average characteristics recorded for the 2002 Treatability Study as compared with average characteristics recorded this year are shown in Table 3 below.

TABLE 3 – FLINT RIVER WATER QUALITY CHARACTERISTICS						
Period	Turbidity NTU	TOC Mg/l	Alkalinity Mg/l	Hardness Mg/l as CaCO ₃	pH	Total Col. Count/day
2001 Apr–Oct	7.9	9.4	215	272	8.1	870-1230 (7300 max)
2014 May–Oct	8.3	10.3 5/22/14	207	252	8.2	1900-9000 (48,300 max)

Other than total Coliform, the Flint River characteristics do not appear to have changed significantly over the past 10+ years. Note that further investigation by City staff revealed a sewer leak upstream of the plant that likely was contributing to the total Coliform count.

B. CONCLUSIONS

Considering the minor changes in Flint River water quality, much of the information contained in the 2002 Treatability Study by AB&H remains relevant today. Data from that report assumed to be consistent today include the following:

- Flint River is influenced by groundwater from a dolomitic aquifer
- Hardness varies seasonally with higher hardness and alkalinity in the winter
- Hardness, alkalinity, magnesium concentrations tend to be reduced by run-off
- Total THMFP is likely 380-440 micrograms per liter as measured between April 2001 and January 2002. The City intends to re-test the raw water to confirm the THMFP has not changed. Results are pending.

In development of the 2002 Treatability Study, processes were simulated which resulted in low THMFP. Therefore, information contained in that report will be used to assist with establishing a baseline jar testing procedure discussed further in Section III.



III. TREATMENT PROCESS EVALUATION

A. EXISTING PROCESS DESCRIPTION

The existing WTP consists of an intake with screening from the Flint River, low lift pumping, ozonation, rapid mix, flocculation, settling, softening, recarbonation, filtration, storage and high service pumping. A process diagram is shown as Figure 1.

1. Intake

A 72" diameter pipe draws water from the Flint River through 2 traveling screens to the low lift pump structure. No chemicals are currently fed for Zebra mussel control or pre-oxidation as recommended by the 2002 Treatability Study. Manual removal of zebra mussels proved to be more economical than installation of chemical feed equipment considering the short term need.

2. Ozone

There are 2 ozone generators designed to provide adequate ozone for a WTP flow of up to 36 mgd. There are 3 ozone contact basins. The ozone generators were designed to produce 900 lbs/day at 10% concentration and up to 1300 lbs/day at 6% concentration each. Recent readings have indicated a production rate of approximately 700 lbs/day at 4% concentration. While serving the purposes of taste and odor control and disinfection, it is possible the current ozone feed might not be optimized to realize additional TOC removal benefits demonstrated by previous tests. Also, less than optimal ozonation has led to increased chlorine feed.

3. Rapid Mix

East and West rapid mix chambers allow chemical feed prior to the flocculation basins. Each rapid mix chamber is equipped with a 5 hp mixer.

4. Coagulation / Flocculation

The WTP contains two equally sized flocculation basins, east and west, and each basin provides tapered or gradually slowed mixing from inlet to outlet. There are fifteen 2 hp mixers for each basin with VFDs to control mixing speed. The 2002 Treatability Study recommended feeding both coagulation and flocculation polymer aids. Neither polymer aid is being used today because turbidity and TOC removals have been sufficient to meet regulatory requirements.

5. Settling

Primary clarification takes place within 3 basins containing plate settlers. The settlers are operating as designed.

6. Softening

Again, there are two basins for softening: east and west. Each basin is 120' in diameter and contains a solids contact softening unit. Each softening basin/unit has a design capacity of 18 mgd. Low lift pumping limitations, flow control to the basins, and fluctuating demands have made it difficult for WTP staff to stabilize the softening process. Softening is accomplished by feeding lime. The decision was made by the City not to feed soda ash in order to remove non-carbonate hardness because acceptable hardness levels could be achieved with lime feed only and softening is short term until Lake Huron water becomes available.



7. Recarbonation

Recarbonation for pH adjustment is accomplished in east and west recarbonation basins between and to the north of the softening basins. Carbon dioxide storage and feed equipment is located west of the recarbonation basins.

8. Filtration

Filtration is accomplished with 12 dual media filters, equally sized and designed to filter 3.0 mgd each. Media consists of 12" of sand and 18" of anthracite. The filters have been operated intermittently over the years due to the standby nature of the WTP and until recently, chlorine injection took place downstream of the filters. It is possible some microbial growth has developed in the filters.

9. Disinfection

Limited disinfection is provided by ozonation, but the primary form of disinfection is chlorine fed prior to filtration and prior to finish water storage / high service pumping. The intermediate chlorine injection location was recently constructed under the Phase II, Segment 1 contract.

10. Clear Well & Pumping

The pump building sits adjacent to a 3 MG clear well and contains both low and high service pumps.

B. JAR TESTS / EXPERIMENTS

1. Approach

There are several well practiced methods by which DBPs can be reduced. First, the disinfectant can be changed to an alternate that has a lower tendency to form DBPs. Second, additional treatment systems such as activated carbon or air stripping (depending on the nature of the precursors) can be added to remove DBP precursors. Lastly, the existing treatment processes can be optimized to remove as much DBP precursor as possible. Of these options, optimizing existing treatment processes is the only strategy that does not require the construction of new and expensive facilities. It is anticipated that Flint will be receiving Lake Huron water in approximately two years and this water will have a completely different chemistry from the Flint River. Major process changes instituted to address THM levels using Flint River water are likely to be unnecessary for Lake Huron water and may even be inappropriate. Therefore, those options which require addition of new treatment processes are undesirable at this time. In recognition of this upcoming change in water source, this study will concentrate on improving the existing processes, rather than adding new ones. New treatment processes will only be recommended if operational changes to the existing treatment train prove ineffective.

Recent sample test results suggest that most of the DBPs are formed in the distribution system rather than within the treatment plant. Therefore, the most logical approach is to reduce the DBP formation potential (DBFP) rather than simply lowering the levels of DBPs leaving the plant. During bench scale testing, formation potential (FP) levels will be the primary indicator of success or failure of any proposed process modifications.

2. Protocol

Bench scale pilot testing is intended to reflect actual plant operating and hydraulic conditions so the bench scale treatment units will be sized based on various dimensionless factors to ensure the pilot treatment matches the actual system. Bench scale ozonation is not practical due to time and cost limitations. Therefore, water



samples will be withdrawn following the plant ozone basin. These samples will be transported to the laboratory where they will be dispensed into square testing jars. The jars will act as rapid mix, three-stage flocculation, and settling. Rapid mix and flocculation conditions will be matched to the plant based on "Gt" values. The "G" value is a measure of the mixing intensity and is a function of mix time, viscosity of the liquid, and mixing power applied to the water. "Gt" then, is a size scaling factor where time has been accounted for. Settling time will be scaled to match the shorter settling depth of the testing jars. After settling, samples will be decanted from the test jars. The decanted samples will then be lime softened; softening conditions will be similarly matched on the basis of "Gt". Fluoride will be added and carbon dioxide sparged into the samples to reduce the pH. The water will then be vacuum filtered through filter paper, sized to simulate the plant's dual media filters. The samples will be dosed with excess chlorine and allowed to react for seven days before testing for DBPs to determine the formation potential.

Although these conditions may be refined based on new information, we anticipate the following:

TABLE 4 – BENCH SCALE TEST MIXING INTENSITIES

Process	G	Duration
Ozonation	Plant	-
Rapid Mix	350	25 sec
Flocculation, Stage 1	50	9 min
Flocculation, Stage 1	25	9 min
Flocculation, Stage 1	12	9 min
Settling	na	10 min
Softening	TBD	10 min
Recarbonation	na	na

It is expected that the primary variables during the testing will be chemical additions and chemical dosages. Specific chemicals and dosages used for initial testing conditions will be selected to reflect current plant usage and the recommendations of the 2002 Treatability Study:

TABLE 5 – BENCH SCALE TEST CHEMICAL FEED RATES

Chemical	Current Usage	2002 Study
Ozonation	4.66 mg/l	1.5 mg/l
Ferric Chloride	7.7 mg/l	40 mg/l
Coagulant Aid Polymer	Not used	2.0 mg/l
Flocculation Aid Polymer	Not used	0.05 mg/l
Lime	120 mg/l	175 mg/l
Soda Ash	Not used	52 mg/l
Cationic Softening Polymer	3.13 mg/l	Not used
Anionic Softening Polymer	0.88 mg/l	Not used
Fluoride	0.45 mg/l	1 mg/l
Carbon Dioxide	32 mg/l	37 mg/l
Chlorine	6.3 mg/l	1 mg/l



3. Considerations

The 2002 Treatability Study did not note significant formation of DBPs. This may be a function of different Flint River water chemistry at that time. However, recognizing the considerable differences in chemical usage and dosages between that study and current operations, those differences in chemical use and dosage are an obvious starting point for optimizing treatment to prevent DBP limit exceedance.

Although it is believed that optimization of current treatment can correct the DBP issue, should optimization of present treatment prove insufficient, alternate residual disinfectants (chloramines and chlorine dioxide) will be investigated as additional treatment measures.

4. Results

To be completed following jar testing and experimentation.

5. Conclusions

To be completed following jar testing and experimentation.



IV. DISTRIBUTION SYSTEM EVALUATION

EPA guidance for the distribution evaluation portion of an OER is focused on identification and isolation of a specific portion of the distribution system that led to the exceedance. The circumstances of Flint's apparent pending TTHM exceedances are unusual in that a new supply has been implemented which clearly corresponds to the high TTHM sample results. Despite obvious implications to the primary cause of increased TTHM levels, value remains in evaluating the distribution system as there may still be distribution improvements that can be made to help alleviate the problem.

Evaluation of the distribution system, including modeling, was recently added to LAN's scope of services. When finished, information will be provided to complete the following topics in this section.

A. INFRASTRUCTURE

1. Piping

Main break history information available?
List pipe data for system... age, material, size

2. Storage

Considering drop off in demands in recent years, are storage tanks oversized?
Do they have mixing, baffling, other, to prevent stagnant water?
Are tanks in good condition?

3. Pump Stations

Condition of pump stations?
Pumps oversized?
Are valves working properly to maintain pressure zones?

B. OPERATIONS AND MAINTENANCE

1. Pump Station & Storage Operations

Are pressure districts set up properly?
Cedar Street Pump Station – no established pressure zone? Talk to Flint
West Side Pump Station – no established pressure zone? Talk to Flint
High and low levels in tanks optimally set? Should they be adjusted to use less storage volume?

2. Booster Disinfection Practices

They don't have any, do they?

3. Changes in System Demands

Long term decline in demands
Short term fluctuations – max day in winter due to large number of main breaks



C. WATER SYSTEM HYDRAULIC MODELING

1. Simulation of Existing System

Match existing conditions, particularly chlorine residual. We have chlorine feed data at plant and residuals at 10 locations in each MOR, May-October.

2. Identification of Deficiencies

Specific issues to look at:

- Worst case at minimum daily demands
- Water age in entire system
- Recirculating water through pump stations
- Use of storage tanks
- Indications of broken valves



V. **RECOMMENDATIONS TO MINIMIZE FUTURE OEL EXCEEDANCES**

A. SOURCE

The City of Flint has already committed to the change from the Flint River as the water source to Lake Huron under the KWA system, planned for late 2016. The risk of future TTHM limit violations will decline substantially with the use of water from Lake Huron due to much lower DBP precursors. It is important to recognize that the Flint River will become strictly an emergency supply when the KWA supply becomes available and any investments toward the Flint River should be contemplated accordingly. Recommendations discussed below in this section apply to the Flint River as the source.

Reverting to supply from the DWSD until the KWA supply is available as an option. However, the DWSD has stipulated that a \$4 million connection fee would apply and current water rates would include approximately \$900,000 / month flat fee plus usage charges. Therefore, utilizing the DWSD for interim supply is cost prohibitive under the terms defined by the DWSD.

1. **Watershed Management**

A volunteer group entitled the Watershed Coalition performs various tasks related to managing the Flint River watershed such as spring cleanups and annual benthic studies to evaluate the river 'health'. No additional action is recommended at this time.

2. **Monitoring**

The City documents typical raw water characteristics as part of standard preparation of Monthly Operating Reports (MOR). No changes are recommended at this time.

3. **Intake Operations**

The 2002 Treatability Study recommended pre-oxidation in the form of sodium permanganate as a feed at the intake. However, pre-oxidation with sodium permanganate is unlikely to provide significant oxidizing of organics beyond that provided by ozonation. It is possible the addition of hydrogen peroxide would enhance the ozone process.

4. **Seasonal Strategies**

Past data indicates the Flint River is influenced by groundwater and in particular, dolomitic spring water. The result is hard water with high concentrations of magnesium and sulfate. Also, hardness and alkalinity are higher during the winter. Upon initiation of supply from the Flint River, the City made the decision to soften with lime only to focus on removal of carbonate hardness. One potential modification that could assist with TOC removal and thus decrease THMFP would be lime and soda ash softening. If implemented soon, the procedural change would be timely as it would also address increased hardness expected going into this winter.

5. **Upstream Contamination Issues**

Upstream contamination issues are extremely difficult to prevent and even if detected are difficult to locate. Evaluation of raw water data collected for MORs is the easiest manner in which to detect upstream contamination issues because the data is already collected for treatment purposes. In fact, high total Coliform readings signaled a potential issue recently that the City found to be a sewer leak, which was subsequently repaired.



An upstream monitoring and warning system could be established to attempt to detect spill event type contamination early enough to cease intake prior to the contamination reaching the WTP. However, given the imminent conversion to the KWA supply, the period of full time use would likely be far too short to achieve payback on the capital expenditures.

B. TREATMENT PROCESS

1. Operational Recommendations

- Coagulation and flocculation polymer aids: The 2002 Treatability Study suggested the use of coagulation and flocculation polymer aids. These polymer aids were shown in the 2002 Treatability Study to increase TOC removal and thereby reduce THMFP. Further evaluation will be completed during jar testing. [what would need to be done to the system to allow feed?? Could it be done easily??]
- Discontinue softening bypass: The City was previously bypassing a portion of flow around the softening basins because hardness levels did not warrant softening of the full stream. However, this practice was discontinued because it was believed the bypass stream was contributing to chlorine demand and preliminary data has supported that belief. Chlorine demand dropped 0.5 – 1.0 mg/l following elimination of the bypass stream in early November 2014.
- Soften with lime and soda ash: Research has shown that enhanced softening with both lime and soda ash may provide additional TOC removal. The efficacy of this option will be evaluated during jar testing.
- Disinfection of filter beds: In case there has been microbial growth it is recommended the filters be 'shock' treated with chlorine and rinsed. A chlorine injection point was added upstream of the filters during the first segment of Phase II so future growth in the filters should not be an issue.
- Optimization of all existing treatment processes: Depending on bench scale testing conditions and results, slight modifications to all treatment processes might in order to replicate lower DPBFP.

2. Infrastructure Change Recommendations

- Fix and/or replace faulty ozone equipment: Since the ozone equipment was installed it has not been used extensively so the hope is that major components remain in good condition and the system can be easily modified to restore proper functionality. The City has scheduled the equipment manufacturer to field inspect the system on December 15, 2014.
- Change disinfectant to chloramine or chlorine dioxide: If other options prove to be ineffective, conversion to another disinfectant should be fully evaluated. Various characteristics of chloramination indicate an advantage over chlorine dioxide, but a full analysis would provide clarity as to which would be preferred.
- Install pre-oxidant chemical feed: Hydrogen peroxide as a pre-oxidant can enhance the activity of the ozone. This option is listed as a consideration only if problems continue with ozonation.
- Repair upstream sewer leak: a sewer leak upstream of the WTP intake was discovered and has already been repaired by the City.



C. DISTRIBUTION SYSTEM

Recommendations will be incorporated into this report when available. It is anticipated details will be provided for the following topics.

1. **Manage Water Age**
 - a) **Storage Tanks**
 - b) **Residence Time in Pipes**

2. **Reduce Disinfectant Demand**
 - a) **Flushing**
 - b) **Cast Iron Pipes**

3. **Water Modeling of Recommendations**

Determine best flushing locations to reduce water age
Changes to storage tank operating levels to reduce water age
Valves to close/add to improve pressure zones, reduce recirculation
Optimization of pump station use – smaller pumps? Shut down?

A number of actions have already been taken in terms of the distribution system. Water main flushing efforts were increased until late November when freezing weather became prevalent. Also, numerous valves that were broken in the closed position and believed to have been contributing to stagnant water were replaced.

D. BOOSTER DISINFECTION

Decreasing chlorine feed at the WTP and adding booster disinfection in the distribution system is an alternative intended to reduce the reaction time at higher concentrations of chlorine to reduce DPB formation. Extensive looping and branching within the existing system would require numerous booster feed points and water system modeling to determine the most effective feed point locations. As a result, booster disinfection would likely not be cost effective. Further discussion and details will be provided when the distribution evaluation results are available.

E. CATEGORIZATION OF ACTIONS

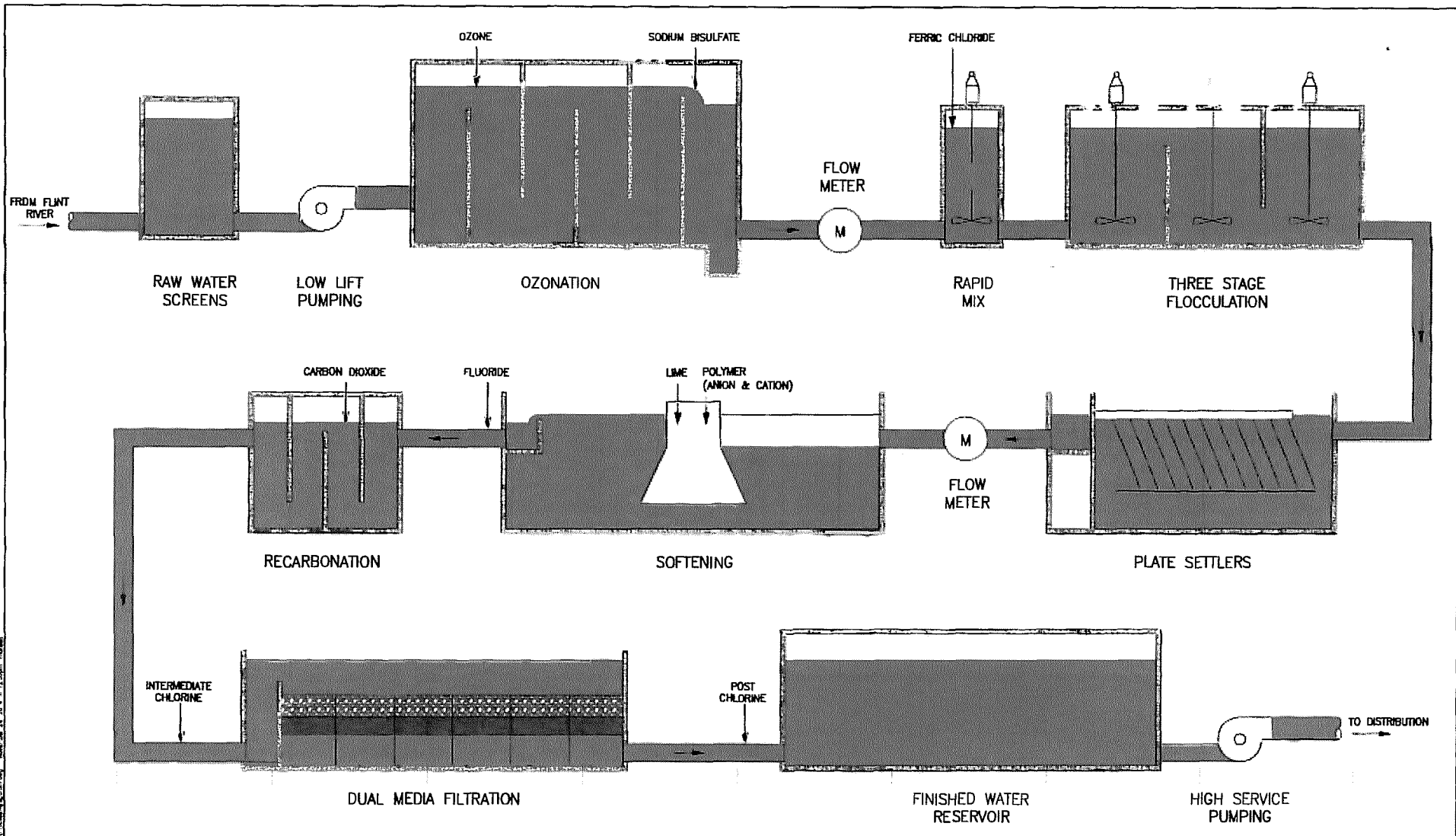
Considering that the Flint River is being used as the water source only until the KWA supply is available (expected late 2016), options to address high THM formation that require new construction or extensive time to implement are not preferred. On the other hand, the City understands THM sample results to date dictate that some action is necessary. Two categories have been developed to assist the City in prioritizing actions to take. Stage 1 consists of actions that can be completed relatively quickly without major construction and Stage 2 actions are either long term actions or solutions requiring major construction. Stage 1 actions are to be completed first followed by evaluation of the results prior to consideration of Stage 2 actions. Grouping of actions are shown in the table below.



TABLE 6 – ACTION PLAN

	Action	Purpose
Stage 1	Troubleshoot ozone feed system	Reduce chlorine feed and increase TOC removal
	Bench scale jar testing	Optimize treatment process and evaluate possible modifications
	Discontinue softening bypass	Reduce chlorine demand
	Disinfect filters	Reduce chlorine demand
	Increased water main flushing	Reduce water age / stagnant water
	Water system modeling evaluation	Determine areas with high water age and reasons
	Implement coag. & floc. polymer aids	Increase TOC removal
	Lower high water level in storage tanks	Decrease water age
Stage 2	Repair ozone system	Reduce chlorine feed and increase TOC removal
	Continue increased water main flushing	Reduce water age / stagnant water
	Convert to lime and soda ash softening	Increase TOC removal
	Continue valve replacements based on water model	Reduce water age / stagnant water
	Change disinfectant to chlorine dioxide	Reduce THMFP
	Install pre-oxidant feed at intake	Optimize ozone disinfection, reduce chlorine
	Place priority on replacing cast iron water mains	Reduce chlorine demand

Samples were taken the week of November 17th for the 3rd quarter of testing. Although the City has begun implementation of Stage 1 actions, THM results are not expected to be noticeably affected since there has not been enough time for a response. The next quarter of sampling is due to be completed the third week in February. It is the City's intent to implement Stage 1 actions prior to the 3rd quarter of THM sampling. [need to make sure Flint is good with this]



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**CITY OF FLINT
 WATER TREATMENT PLANT**

REVISIONS		FILE LOG	
NO.	DESCRIPTION	DATE	BY

**WATER TREATMENT PLANT
 PROCESS DIAGRAM**

Project No. 130-10781-001
 Date: Nov. 21, 2014

Sheet
FIG 1