



CITY OF FLINT

Dr. Karen Weaver
Mayor

August 18, 2017

Mr. Robert Kaplan, Acting Regional Administrator
Region 5
United States Environmental Protection Agency
Ralph Metcalfe Federal Building
77 West Jackson Boulevard (W-15J)
Chicago, Illinois 60604-3590

Sent via Email

Dear Mr. Kaplan:

This correspondence is a response to USEPA's letter which expressed concern with the City of Flint's (City) obligation to ensure that sufficient management and operational staff is available to properly operate the City's Potable Water System (PWS). The City, Michigan Department of Environmental Quality (MDEQ) and State of Michigan (State) recognize that proper levels and quality of staffing are necessary to comply with USEPA's January 21, 2016 Emergency Order and the November 17, 2016 First Amendment. Also, the City must maintain the necessary and qualified personnel to comply with regulations, protect public health and secure the Federal/State funding for necessary infrastructure improvements.

Maintaining the proper staffing level for the City's Water Department has been a challenge for many reasons. Below-market compensation levels, uncertainty regarding Flint's future water source, excessive workload due to fluctuations in staffing levels and morale issues have contributed to the City's inability to attract and retain qualified employees.

The City's recommended future primary water source is purchased water from the Great Lakes Water Authority (GLWA). This operation will initially involve chemical treatment of the GLWA finished water and operation of the distribution system (pumping stations, tanks, pipes, meters, hydrants, etc.). This mode of operation should continue for at least three years, even if the City ultimately decides to proceed with extensive improvements to its treatment plant. However, staffing will also be required to help manage the future capital program. Therefore, an organization chart (see attachment) has been developed to support this initial (and possible long-term) operation.

The proposed organization chart reflects the City's staffing levels as of September 1, 2017. Some of the vacant positions are considered high priority positions that should be immediately addressed to provide proper leadership and maintain regulatory compliance. These positions include the Director-Public Works, WQ/Laboratory Supervisor, Laboratory Technician and a properly licensed Operator-In-Charge (OIC). While the remaining vacancy must also be filled, the urgency is not as critical (see NC on chart). The chart below summarizes the timing and approach to address vacant positions.

Vacant Position	Short-term Approach	Projected Hire Date
Director – Public Works (1)	Hire search firm	January 1, 2018
Operator-In-Charge (1)	Contract	Promotion
WQ/Laboratory Supervisor (1)	Contract	November 1, 2017
Laboratory Technician (1)	Contract	November 1, 2017
Maintenance (production) (3)	NC	September 15, 2017
Instrument Technician (1)	Contract	November 1, 2017
Distribution Supervisor (1)	NC	Promotion
Senior Distribution Operator (6)	NC	November 1, 2017

To attract and retain the required talent, the City has initiated a compensation review using AWWA's Compensation Survey for Medium-Sized Water and Wastewater Utilities as a resource. Additionally, an employment search firm will be contracted to identify candidates for critical positions. Communication with existing employees will be increased to address questions regarding the future water source and career opportunities. Increased automation will continue to be deployed within the PWS to help manage workload and improve operational efficiency. As automation increases, some current production operating personnel can fill other utility positions. Finally, contracted service will be considered for high priority positions if the appropriate hires cannot be completed within sufficient time.

As co-responders to the Order, Mr. Eric Oswald (Director – Drinking Water and Municipal Assistance Division, Michigan Department of Environmental Quality (MDEQ)) has reviewed this submittal on behalf of the State and concurs with the content of the document. The State has recently completed a Sanitary Survey for the Flint system. The survey recognizes similar staffing concerns and identifies other operational, infrastructure and financial challenges. MDEQ will continue to assist the City with operator training and monitor the City's progress toward addressing the Sanitary Survey issues.

If you have clarifying questions and/or need additional information, please contact me at (810) 237-2035 or via email at kweaver@cityofflint.com.

Respectfully submitted,

Dr. Karen W. Weaver
Mayor

cc: Mr. Chris Korleski, US EPA
Mr. Rich Baird, Governor's Office
Mr. Keith Creagh, MDNR
Mr. Eric Oswald, MDEQ
Mr. Sylvester Jones, City of Flint

Attachments:
Flint Water Organization Chart

UTILITIES WATER DIVISION

