BENTON HARBOR COMMUNITY WATER COUNCIL
1940 Union Street, Benton Harbor, Michigan 49022
BHCWC.org

Sent Via Email

August 9, 2021

Environmental Protection Agency, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Acting and Deputy Regional Administrator Cheryl Newton,

Thank you for the immediate reply to the letter I sent on July 22, 2021, regarding serious concerns with drinking water in Benton Harbor, Michigan. With your help, on August 4th the Benton Harbor Water Council (BHCWC) and its partners[1] met with several Region 5 drinking water program and enforcement staff, and Michigan Environmental, Great Lakes, and Energy (EGLE) officials regarding several urgent matters, including maintenance and painting of the city's water tank.

We learned good news from Eric Oswald, Michigan Drinking Water Environmental Health Director, that the water tank was remediated for lead in the 1990's and has no detectable lead now. EGLE will continue to monitor the project for deficiencies and fugitive dust. In response to BHCWC's concerns about drinking water quality, Mr. Oswald reported that EGLE continues to monitor and discuss "complex surface water treatment" and corrosion controls with Benton Harbor water utility operators and city officials. We look forward to EGLE sharing their documentation of the 1990's remediation project and the data they have collected during the current tank restoration project.

After our call concluded on August 4, Benton Harbor residents were notified of Benton Harbor's 6th consecutive lead action level exceedance in 3.5 years, with 11 of 78 samples collected over the lead action level of 15 ppb. We were surprised that these data were not shared during our call regarding the ongoing urgency of communication and intervention for the residents of Benton Harbor. We are also surprised at the timing of the announcement. Samples were due to EGLE on July 10. The 25-day delay in notifying the residents of Benton Harbor does not seem to be appropriate to the scale and scope of this ongoing water quality emergency. To date, only one media outlet has shared the mandatory public advisory required in the state of Michigan. As in so many lead action level exceedances before, this magnitude of outreach is insufficient. EPA and EGLE must provide greatly enhanced assistance in communicating the most recent lead action level exceedance with the community and ensure that every household in Benton Harbor has reliable access to safe water through lead reducing filters. Benton Harbor is the only community in Michigan to have 3 consecutive years, let alone 3.5 years of lead action level exceedances. It is time to provide the interventions and assistance that residents of Benton Harbor have needed for this entire time. We request that EGLE provide a copy of the raw lead sample data immediately so we can better understand the ongoing scope of lead contamination in our city.

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[1] Great Lakes Environmental Law Center, Michigan Welfare Rights Organization, Natural Resources Defense Council, People's Water Board Coalition, and Safe Water Engineering.

In the council's determination -- and that of more than 50 residents who gathered on July 10th for a community drinking water and lead education event by BHCWC and its partners -- the community of Benton Harbor requires more EPA intervention and direct assistance for safe drinking water. Specifically, these are the immediate issues that believe must be addressed by EPA as drinking water program and enforcement officials continue to contemplate and pursue options with local water utility and government operators. Residents can no longer tolerate the cumulative health impacts of lead risks in the drinking water through

Benton Harbor Community Water Council strongly requests discretionary, emergency grants to:

1. Purchase and provide a faucet-mounted water filtration system for each of the 5,800 residences in Benton Harbor. For homes with old kitchen faucets that cannot fit a new faucet-mounted filter, provide for a new faucet and/or a filtered pitcher.
2. Acquire and deliver water filter hardware, plus provide training and installation assistance to residents and complete a documentation form for the database project in item 3.
3. Work with the Berrien County Health Department to develop a water filter database to document households that have been provided with water filter hardware, replacement filters, and community education for public health and safety. There is no complete public record of homes that have received filters from any source.

Proposed budget

Cost Item	**Quantity**	**Cost Per Home**	**Subtotal**
Faucet-mounted filters and 2 replacement filters; New kitchen faucet to accommodate faucet-mounted filter, if needed, because of old faucet.	5,800	$100	$580,000.
BHCWC acquisition and delivery of lead filter hardware, plus training and installation assistance to residents; obtain authorizations and data documentation.	5,800	$50	$290,000.
Data coordination with Berrien County Health Dept for new lead filter database; data and technical support.	5,800	$20	$116,000.
		Subtotal	$986,000.
Grant administration: 7%	1 year		$69,020.
		Total	**$1,055,020**

Ms. Acting and Deputy Regional Administrator, we know you are greatly concerned with the drinking water crisis in Benton Harbor as presented to you. We look forward to your positive reply to help the residents of this small Michigan town address the inequitable and environmentally unjust drinking water conditions that have plagued us for far too long.

We are hopeful that the improved communication we have witnessed by EPA and EGLE officials will help to correct shortcomings and long-standing problems with our local water utility. Meanwhile, we are counting on the EPA to help us provide the safe drinking water that our vulnerable community needs, especially the children, seniors, people with disabilities, and people with chronic diseases and illness, including lasting effects of COVID-19.

Thank you for time and consideration of our much-needed proposal.

Sincerely,

Rev. Edward Pinkney
President, Benton Harbor Community Water Council

Cc:
A. Walts, EPA Region 5
E. Oswald, EGLE