

UPDATE: NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT

MARCH 27, 2019



GLWA

Great Lakes Water Authority

Background

- GLWA and DWSD have been negotiating with MDEQ a new National Pollutant Discharge Elimination System (“NPDES”) Permit. The Permit will govern operations at the WRRF, CSO Control Facilities and DWSD’s green infrastructure projects.
- After several rounds of meetings and comments, GLWA has the Final Draft Permit (pending Public Notice and Hearing). MDEQ submitted the Permit to EPA Region 5 and they have completed their review. GLWA and MDEQ also met with environmental and public interest groups to discuss the Permit.



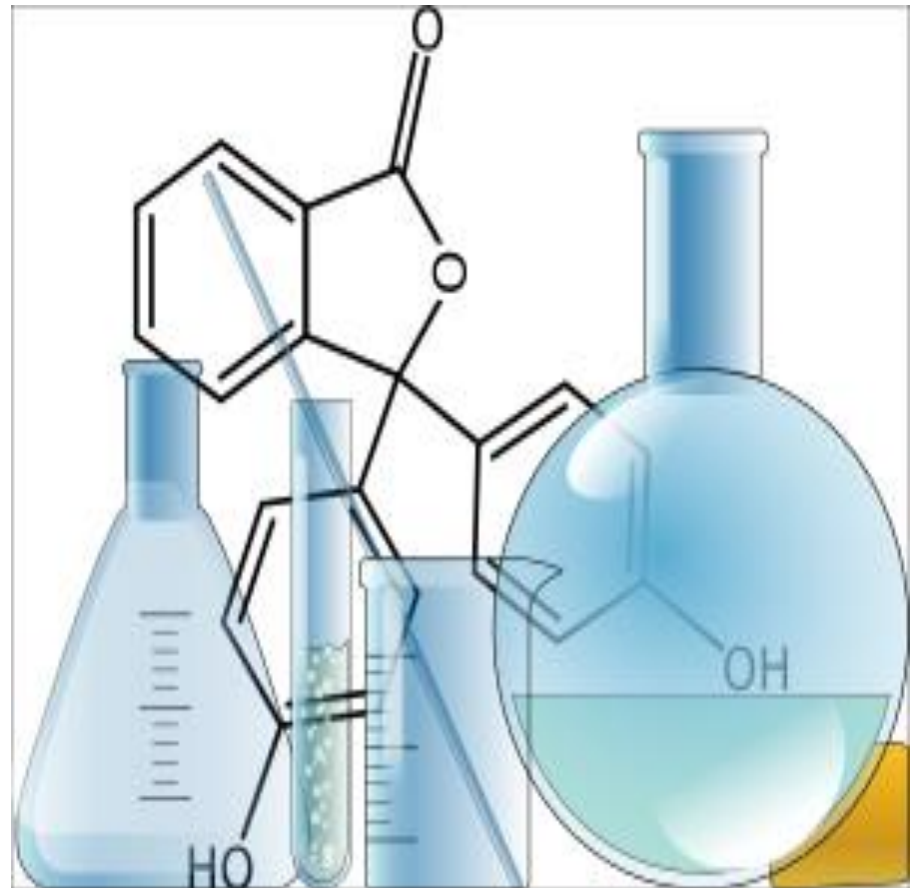


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5 SIGNIFICANT PERMIT MODIFICATIONS

PFAS/PFOA

- In February 2018, the MDEQ implemented a new evaluation procedure for PFAS/PFOA.
- The new rules require all wastewater treatment plants with industrial pretreatment programs, to evaluate the potential sources of PFAS/PFOA, investigate probable sources, reduce/eliminate the sources found and take other actions to protect surface water quality as needed.
- GLWA amended its protocol to adhere to the new requirements.



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No Requirement For New Construction of CSO Control Facilities

- GLWA and MDEQ were able to agree that construction of CSO Control Facilities would not be required during the 5-year term of the proposed Permit.
- Further, the costs for any construction projects in the next permit term (2022 -2027) are expected to be relatively low. The Financial Capability Evaluation will continue to be a factor in the affordability assessment.



Long Term CSO Control Program

The proposed Permit includes the opportunity for GLWA to reevaluate and propose a new comprehensive Long Term CSO Control Program.

The permit also includes new classifications for CSO Outfalls that discharge minimal volumes or only under extreme events.

Qualifying outfalls will not require construction of CSO controls.

Interim Wet Weather Operations Plan (IWOP)



GLWA and MDEQ had differences as to the best way to operate the regional system during wet weather for the interim period pending completion of the Long Term CSO Control Plan.



GLWA committed to a comprehensive program to educate, model, evaluate and analyze the regional system to establish operational protocols.



This program was initiated in February 2017 and has been very successful; serving as the foundation for understanding of the very complex regional collection and treatment system. On January 10, 2019, MDEQ issued its approval of IWOP.

Detroit's Green Stormwater Infrastructure (GSI)

The ongoing GSI Program managed by DWSD will continue to play an important role in the long-term plans for wet weather operations, CSO control and affordability.



Public Notice & Comment Schedule

The Permit has been posted and is also available on the GLWA website <https://www.glwater.org/update-feeds/public-notice-mpdes-permit-mi0022802/>

The public notice period is March 18 – May 3, 2019.

A public meeting will be held Thursday, April 18, 2019, at 6:30 PM - 9:00 PM at the Delray Community Center, 420 S. Leigh Street, Detroit, MI.

Following the public comment period and public hearing, we anticipate MDEQ will issue the New Permit to GLWA and DWSD.