

GLWA's Industrial Pretreatment Program



Regulatory control program mandated under NPDES permit

- Federal General Pretreatment Regulations (40 CFR 403) and National Categorical Pretreatment Standards (40 CFR 405-471)
- Michigan Administrative Code (Part 23 Rules)
- 2019 GLWA IPP Rules



Regulates nonresidential users



The regulatory requirements vary based on what is being discharged

GLWA Adopted Rules in 2019 for its Industrial Pretreatment Program

Pretreatment Program to regulate *Toxic Pollutants*

Groundwater and Other Wastes Program – Permit special waste situations

Surcharge Program to address costs of High-Strength Wastewater

Hauled Septage Waste – Septic Tank and Porta-potty

Pollutant Minimization
Programs – Mercury, PCB
and PFAS Compounds

Chronological Events - Amendment

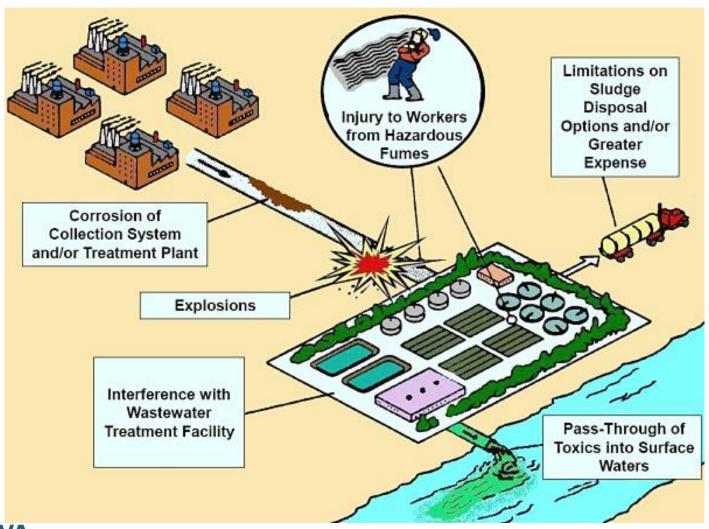
2019 - GLWA Board adopts Rules (November 2019)

Member Communities Notified for Concurring Resolution, Process Completed in September 2022

- 2021 Submission of GLWA Local Limits Re-evaluation Study Approved by MI EGLE (Jan_25, 2023)
- 2022 Submission of GLWA IPP Program (October 2022) Approved by MI EGLE (February_10, 2023)*
- 2024 Presentation of Rule Amendment 9/2024 - Public Comment Period Opens 11/2024 - Public Comment Period Closure

^{* -} Indicates NPDES Incorporation Required for Enforceability

Why are Local Limits Needed?





Proposed Amendment to GLWA's 2019 Rules

- New or Amended Definitions:
 - Add "Non-residential water meter" Clarification to reflect term usage from 1981
 - Modification "PFAS Compounds" Addition of eleven (11) new compounds recognized by MI EGLE
 - Modification "Total Phenolic Compounds" Clarification of test method
- New or Amended Local Pollutant Discharge Limitations
 - Modify "Phosphorus" = 125 mg/l (formerly 150 mg/l)
 - Add "Cyanide, Available" = 1.5 mg/l
 - Modify "Copper" = 0.72 (formerly 3 mg/l)
 - Add "Mercury" = 0.0002 mg/l (formerly 0.01 mg/l or Non-Detect)
 - Add "Perfluorooctane Sulfonic Acid (PFOS) = 65 ng/l
 - Modify "Total Phenolic Compounds" = 5 mg/l (formerly 1 mg/l)
- Correction Typographical error in Chapt. II, Sec. 4(ii) "seven" (formerly "eight"

Next Steps

- Public Comments and responses submitted to GLWA Board (November 2024)
- Presentation of comments and responses to GLWA Board and Scheduling of Public Hearing
- GLWA Board action following Public Comment Period and Hearing
- Following GLWA Board approval, Publication of rule and 30-day period to become enforceable.



One Water ... One Team