

From: [Mdmahbubur Bhuiyan](#)
To: [Stephen Kuplicki](#)
Cc: [Thomas Eapen](#)
Subject: RE: FYI: 2024 Amendments to GLWA Rules
Date: Wednesday, September 25, 2024 7:43:59 AM
Attachments: [image001.png](#)
[image002.png](#)
[image007.png](#)

Good Morning Steve,
 I have minor comments/suggestion on our proposed IPP Rules amendment:

- As per 40 CFR 136.3 approved methods for Total Phenolic Compounds are 4-AAP method which can be EPA 420.1, EPA 420.4, SM 5530 B, SM 5530 D or ASTM 1783-01. All methods listed on 136.3 follow color reaction of 4-aminoantipyrine (4-AAP). Instead of saying US EPA 420.1 we could say total recoverable phenols by 4-AAP colorimetric method.

is suspended in, water, wastewater or other liquids, and is removable by laboratory filtration or as measured by standard methods.

“Total Phenolic Compounds” means the quantitative total recoverable phenols determined by US EPA Method 420.1: 4-Aminoantipyrine (4AAP).

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48. Phenols, mg/L	Manual distillation, ²⁶ followed by any of the following:	420.1 (Rev. 1978) ¹	5530 B-2021	D1783-01(12)
	Colorimetric (4AAP) manual	420.1 (Rev. 1978) ¹	5530 D-2021 ²⁷	D1783-01(12) (A or B).
	Automated colorimetric (4AAP)	420.4 Rev. 1.0 (1993).		

- We listed Cyanide under table with heading/title of Metals. May we can write Metals and Cyanide.

2) Metals

Pollutant Name & Symbol	Daily Maximum Limitation (mg/l)
Arsenic (As)	1.0
Cadmium (Cd)	3.0
Chromium (Cr)	25.0
Copper (Cu)	0.72
Cyanide, Available (CN _{Av})	1.5
Lead (Pb)	1.0
Mercury (Hg)	0.0002
Nickel (Ni)	5.0
Silver (Ag)	1.0
Zinc (Zn)	12.0

3) Organic Pollutants

Thank you.

Mahbubur Bhuiyan, P. E., PMP

Management Professional - Industrial Waste Control

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General Information: 844.455.GLWA(4592)





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November 5, 2024

Mr. Stephen Kuplicki, P.E., J.D.
Operations Manager, Industrial Waste Control
Great Lakes Water Authority
Industrial Waste Control
9300 West Jefferson
Detroit, MI 48209

Subject: 2024 Updated Rules for the GLWA Regulatory Control Programs

Dear Mr. Kuplicki,

This letter is in response to the notice received from the Great Lakes Water Authority (GLWA) dated September 26, 2024 concerning the proposed revisions to the Industrial Pretreatment Program (IPP) Rules which went into effect in October 2022. The notice states that comments on the proposed changes will be accepted until 11:59 pm on November 11, 2024. Ameresco Woodland Meadows Romulus LLC (Ameresco) operates a facility in Canton under GLWA Wastewater Discharge Permit No. 006-96829-IU. Ameresco has the following comment for your consideration:

The definition of “Total Phenolic Compounds” on page 10 has changed to the quantitative total recoverable phenols determined by US EPA Method 420.1: 4-Aminoantipyrine (4AAP). Previously, the analysis method was not included in the definition. Ameresco understands that US EPA Method 420.4 is a commonly-used method for total phenolic compounds analysis. Methods 420.1 and 420.4 are the same test; the only difference being 420.1 is the manual colorimetric method and 420.4 is the automated colorimetric method. Both utilize 4-Aminoantipyrine which is the color reagent. Ameresco recently inquired to two (2) prominent local laboratories; Pace Analytical and Eurofins, both of whom Ameresco has utilized extensively in the past, regarding availability of the 420.1 method. Both labs informed Ameresco that they do not perform method 420.1, and only offer 420.4. Given that they are the same method, the only difference being manual vs. automated, Ameresco understands that both provide accurate and reliable results and therefore should both be allowed under GLWA rules. Therefore, Ameresco requests that the proposed definition be revised in the rule as follows:

“Total Phenolic Compounds” means the quantitative total recoverable phenols determined by US EPA Method 420.1: 4-Aminoantipyrine (4AAP) or US EPA Method 420.4.”

Ameresco appreciates your attention to this revision request, and requests that GLWA please provide a written response. Should you have any questions or desire to discuss this request, please do not hesitate to contact me at (704) 989 – 2023 or smiths@ameresco.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stevia H. Smith".

Ms. Stevia Smith, RNG Compliance Manager
Authorized Representative
Ameresco Woodland Meadows Romulus LLC

cc: Mr. Richard Peary – Ameresco
Ms. Rebecca Sherwood – Ameresco



Michigan Waste & Recycling Association

124 W. Allegan, Suite 1900 • Lansing MI 48933 • Phone 517-484-6561

November 5, 2024

Via e-mail (iwc@glwater.org)

GLWA – Industrial Waste Control
Attn: Operations – Manager
9300 West Jefferson
Detroit, MI 48209

RE: Comments on 2024 Updates to the Rules and Regulations for the Regulatory Control Programs

Dear Mr. Kuplicki:

The Michigan Waste and Recycling Association (MWRA) objects to the PFAS-related supplemental enforcement action provisions in Section II-1006 of the 2024 updates to the Rules and Regulations for the Regulatory Control Programs being proposed by the Great Lakes Water Authority (GLWA), which impose unachievable reporting obligations on landfills. This letter is being submitted as public comment to the proposed rules.

MWRA continues to object to supplemental enforcement provisions in the proposed amended regulations, particularly as they relate to the required content of the “PFAS Compound Program” applicable to centralized waste treatment facilities and landfills. Accordingly, MWRA restates and incorporates by reference here the comments set forth in its letter dated October 9, 2019. In addition, MWRA requests that GLWA make the following modifications to Sections II.1006 (2) and II.1006 (2) (iv):

- 2) Centralized Waste Treaters & Landfills: Any Centralized Waste Treatment Facility or an active/inactive landfill who either (i) accepts wastes and Wastewater containing PFAS Compounds for treatment and/or disposal, or (ii) who identifies PFAS Compounds in any wastes or Wastewaters received in accordance with paragraph II-1006-d)(2)(i), or (iii) who becomes or is made aware of PFAS Compounds present in the wastes and Wastewaters from any source, and discharges to the POTW, or (iv) who is notified by the Control Authority that its discharge contains PFAS Compounds; shall, develop, submit and implement a comprehensive “PFAS Compound Program” describing methods and procedures to identify, control, reduce, dispose of, eliminate and/or treat wastes and Wastewaters containing PFAS Compounds. ~~At a minimum, The~~ PFAS Compound Program shall include the following information, as appropriate, taking into account the feasibility of estimating or appropriately testing the level of PFAS Compounds in the wastes and the relative mass contribution of regulated PFAS to GLWA's influent compared to overall PFAS loading:

- iv) The PFAS Compound Program must describe a Recordkeeping Program that at a minimum, documents the volume(s) of PFAS Compounds wastes and Wastewaters received; the mass of PFAS Compounds in pounds received by the facility and any

mass (in pounds) removed by treatment, discharged to the POTW and disposed of through any other off-site source. Such information shall be summarized for each calendar month and submitted to the Control Authority by the 10th of the succeeding month, or other frequency approved by the Control Authority.

MWRA believes these modifications allow the Control Authority more leeway to approve a PFAS Compound Program that actually reflects the reality of landfill operations. It is impossible to accurately determine the volume or mass of PFAS in most municipal solid waste delivered to landfills, and data establishes that the PFAS discharges to the GLWA are de minimis in any case. Accordingly, the information specified in PFAS Compound Program recordkeeping and reporting requirements impose burdens on landfill operations that are unlikely to be justified in terms of providing GLWA with useable data to assist GLWA in further reducing PFAS loadings to its headworks.

In addition, on page 16 of the draft rules, in the metals table, Mercury is proposed to have a new Daily Maximum Limitation of 0.0002 mg/l, while the current limit is 0.01 mg/l (as of 2022). Please provide a basis for the dramatic decrease.

Thank you for your attention to the above concerns.

Sincerely,
Michigan Waste and Recycling Association

Kevin Kendall

Kevin Kendall
President

Debra Johnston

Debra Johnston
Technical Standards Committee Chair

From: Adam Majestic <amajestic@detroitchamber.com>

Sent: Wednesday, October 23, 2024 11:01 AM

To: Brian Shoaf <bshoaf@detroitchamber.com>; Bill Wolfson <Bill.Wolfson@glwater.org>

Subject: RE: Great Lakes Water Authority

<p style="text-align: center;">CAUTION: THIS EMAIL IS FROM AN EXTERNAL SENDER Do not click on links or open attachments unless this is from a sender you know and trust.</p>

Hi Bill,

As stated below, we are interested in the projected timeline for the implementation of the proposed rule changes to wastewater. Is there a compliance period for the changes and will current licenses be affected by the changes? I can set up a time to talk if the answer is too long for an email.

Thank you,

Adam Majestic
Manager, Government Relations
Detroit Regional Chamber
C: (586) 489-9789