

UPDATE: NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT

JULY 24, 2019



2019 NPDES PERMIT UPDATE

- *The National Pollutant Discharge Elimination System (“NPDES”) Permit will govern operations at the WRRF, CSO Control Facilities and DWSD’s green infrastructure projects.*
- *For nearly 2 years, GLWA and DWSD have been negotiating with the Michigan Department of Environment, Great Lakes and Energy (EGLE), formerly MDEQ, the new Permit.*
- *The Permit was reviewed by environmental and public interest groups, EPA Region 5, and was made available for public review and comment through a 30-day Public Notice and Hearing.*



SUCCESS!



July 1, 2019, GLWA received notice from EGLE that the NPDES Permit for GLWA and the City of Detroit has been processed and issued.



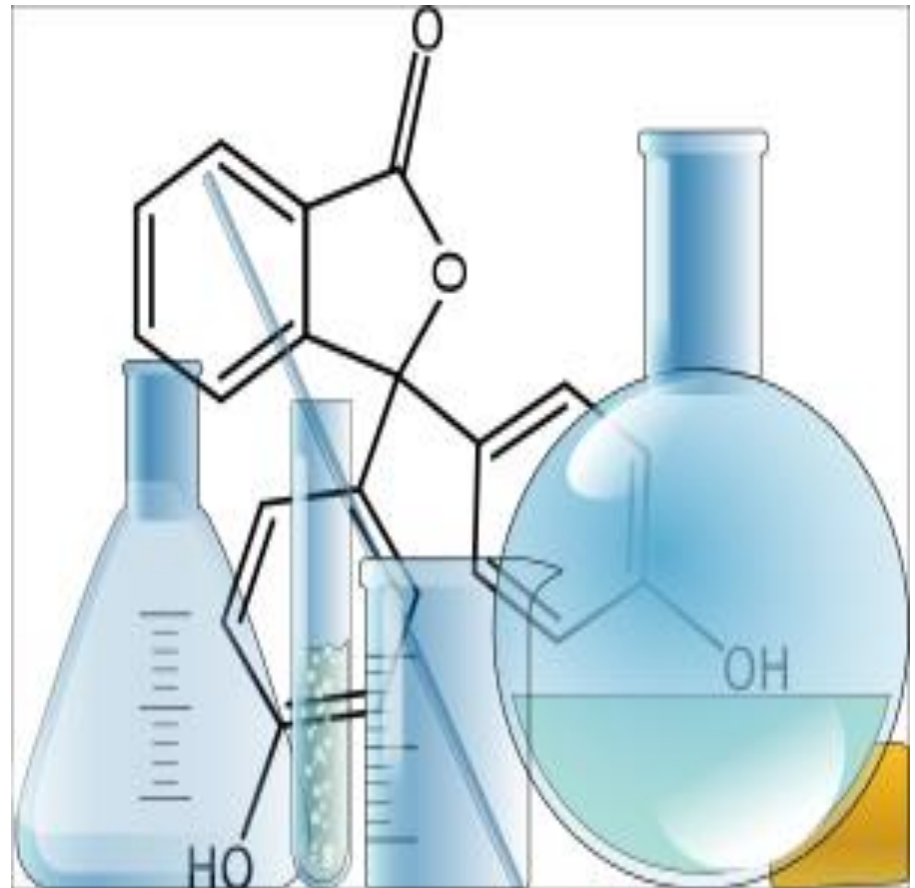
The new permit will be publicly posted in EGLE's MiWaters website at <https://miwaters.deq.state.mi.us>



SIGNIFICANT PERMIT MODIFICATIONS

PFAS/PFOA

- In February 2018, the EGLE 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 EGLE were able to agree that construction of CSO Control Facilities would not be required during the 5-year term of the new 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.



Interim Wet Weather Operations Plan (IWOP)



GLWA and EGLE 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, EGLE 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.



NEXT STEPS

The Approved Permit is available on the MiWaters website:

<https://miwaters.deq.state.mi.us>

The 2019 IPP RULES (Amended to align with the Permit) will be submitted to the GLWA Board for approval. Joint EGLA/GLWA Public notice period to follow.

After public notice and comment period has expired, New NPDES and IPP Rules will be rolled out to Detroit, Counties, and constituent municipalities for adoption by Resolution.