



ADMINISTRATIVE COMPLIANCE AGREEMENT (ACA) UPDATE December 10, 2025

Cheryl Porter, *Chief Operating Officer – Water and Field Services*

What is an ACA?

- 💧 **ACA** stands for **Administrative Compliance Agreement** – voluntary, legally enforceable
- 💧 It is an agreement between the Michigan Department of Environment, Great Lakes, and Energy (EGLE) and GLWA resulting from sanitary surveys conducted at GLWA facilities
- 💧 Signed August 5, 2023
- 💧 Not an Administrative Consent Order (ACO) – unilateral judgment



Sanitary Survey

- 💧 A sanitary survey is a periodic inspection of a public water system to assess its capability of supplying safe drinking water
- 💧 The water system facilities, operations, and records are reviewed to identify conditions that may present a sanitary or public health risk
- 💧 EPA requires that community water systems be inspected every three years
- 💧 Must address significant deficiencies and deficiencies within 120-days or submit a plan
 - 💧 Regional system our size very little can be done in 120-days



Sanitary Surveys Conducted at GLWA

The last Sanitary Survey conducted by EGLE at GLWA facilities:

GLWA Facility	Last Sanitary Survey Conducted
Lake Huron Water Treatment Plant	October 8, 2024
Water Works Park Water Treatment Plant	September 18, 2025
Booster Station & Transmission System	January 8, 2021
Northeast Water Treatment Plant	October 30, 2025
Springwells Water Treatment Plant*	May 25, 2022
Southwest Water Treatment Plant*	August 2, 2022

*** Note: EGLE was reminded about Springwells and Southwest sanitary surveys which will be scheduled next year.**

EGLE acknowledges that resource limitations on our part, as well as the number and complexity of the required improvements, contributed to delays in meeting the 120-day deadlines.

Statements from the Sanitary Survey Report

“Please share these findings with GLWA Board Members so local decision makers are informed of the water needs.”

The above statement was in both the Sanitary Surveys for Northeast and Water Works Park.

“At this time, GLWA Northeast Water Treatment Plant is meeting the strict primary water quality standards of Act 399 and complies with all water sampling requirements.”

Items Identified in ACA

Total number of items: 27

11 of the 27 items were closed the day the ACA was signed

NOTE: The items in the ACA have been numbered based on the signed agreement and that numbering system is followed as referenced in the Corrective Action Plan Exhibit B of the ACA.

Area	# of Items Per Location
Common-To-All	6
Lake Huron	2
Water Works Park	1
Booster Station & Transmission System	1
Northeast	4
Springwells	8
Southwest	5
Total	27

Completed Items

(11 of the 27 items were closed the day the ACA was signed)

Area	Item #	Description	Status
Common-To-All	1	Standard Operating Procedure (SOP) to ensure filtration rates	Completed
	3	SOP to monitor filter backwashes	Completed
	6	Comprehensive and formal maintenance program	Completed
Springwells	7	SOP on filter performance monitoring	Completed
	9	Plan on filter decommission	Completed
	10	Operator-in-charge and back-up updated	Completed
	17	Inspection report on Reservoir #1 interior	Completed
Southwest	12	Plan on filter decommission	Completed
	16	Sludge removal work plan	Completed
Northeast	13	Replacement of flow and loss of head meter	Completed
Water Works Park	19	Work plan on sludge removal equipment operability	Completed

Last Submission – December 2024

Items sent to EGLE are considered closed unless an additional responses are received.

Date	Location	Item #	Description	Status
12/18/2024	Southwest	11	Completion of a study to determine reason for failed Filter #20	Completed

Current Submissions

EGLE agrees that submitted items are closed

Total items submitted to be closed – 19:

Date	Item #	Status
03/27/2023	1, *2, 3, 6, 7, 9, 10, 12, 16	CLOSED
06/30/2023	13, 17, 19	CLOSED
08/31/2023	27	CLOSED
12/31/2023	8, 22	CLOSED
02/20/2024	18	Additional Information Requested
06/29/2024	15, 18	CLOSED
10/16/2024	4	CLOSED
12/18/2024	11	CLOSED

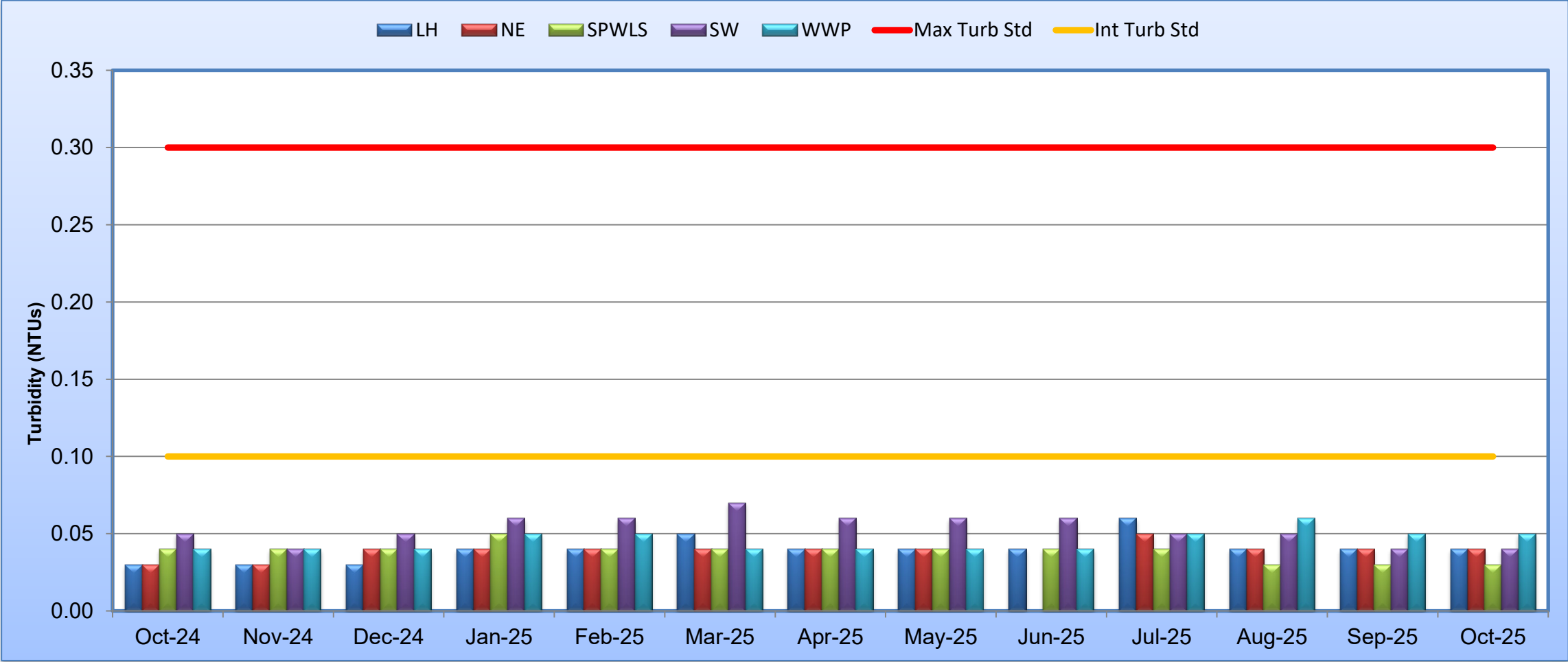
* Item #2 – form for reporting to EGLE approved

Settled Water Exceedance Submissions as of November 5, 2025

Turbidity Exceedance Events	Northeast	Springwells	Southwest	Water Works Park	Grand Total
2023		1			1
2024	1	14	3	5	23
2025		32	10	6	48
Grand Total	1	47	13	11	72

Monthly Finished Water Turbidity by Plant – (Average)

Average nephelometric turbidity unit (NTU)



Outstanding Items (Location)

Total Items Remaining – 8

Area	Item #	Description	Date
Common-To-All	5	Corrosion Control Treatment Changes	TBD
Lake Huron	20	G-Value	05/15/2026
	23	Flocculator Equipment	05/15/2031*
Northeast	14	Corroded Filter Troughs	12/31/2029
	24	Flocculator Equipment	03/18/2027
Springwells	26	1958 – Flocculator Repair or Rehab	11/11/2027
Southwest	21	G-Value	12/31/2027
	25	Flocculators	07/31/2031

* Requested 2-year (05/15/2029 to 05/15/2031) extension approved by EGLE

G-Value: the velocity gradient (G) or mixing intensity value

Critical Items of Concern

There are currently no critical items of concern.



Questions



Appendix

Expanded Information of ACA Items

Organized by
location then item #

Common-to-All Treatment Plant Items Identified: 6

Item	Description	Status	Closed Date	Due Date	Contract #
1	Submission of SOPs and/or modification of filter rate controls to ensure filtration rates are maintained below the maximum approved rates	CLOSED	03/27/2023	N/A	In-house project
2	Report within 24 hours to EGLE the interim settled turbidity above 2.0 NTU	CLOSED	03/27/2023	Report until plant improvements are complete	In-house project
3	Establishment, implementation, and submittal to EGLE of a SOP to monitor filter backwashes with a description of all filter monitoring and controls	CLOSED	03/27/2023	N/A	In-house project

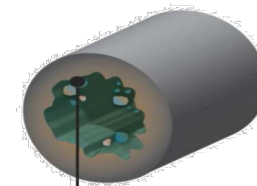


Common-to-All Treatment Plant (continued)

Item	Description	Status	Closed Date	Due Date	Contract #
4	Submission to EGLE of the final corrosion control study report	CLOSED	10/16/2024	N/A	1803705 Arcadis
5	Make any changes to the corrosion control treatment at each of the surface water plant	In Process	-	As agreed upon by the parties	N/A
6	Submit to EGLE a description of the comprehensive and formal maintenance program, including databases of equipment and how the work orders are tracked	CLOSED	03/27/2023	N/A	In-house project



A protective layer of **Orthophosphate** forms to prevent pipe corrosion.



Lack of corrosion control allows lead to leach from pipes into water.

Lake Huron

Items Identified: 2

Item	Description	Status	Closed Date	Due Date	Contract #
20	Installation of rapid mixer(s) or demonstration of G-Value	In Progress	-	05/15/2026	2004549 (CIP 111012)
23	Repair or replacement of the inoperable flocculation equipment	In Progress	-	05/15/2029	2004549 (CIP 111012)



Water Works Park

Items Identified: 1

Item	Description	Status	Closed Date	Due Date	Contract #
19	Work plan to EGLE for review and approval of how the sludge removal equipment will remain in operational condition until permanent repairs are completed	CLOSED	06/30/2023	N/A	In-house project



Booster Station & Transmission System

Items Identified: 1

Item	Description	Status	Closed Date	Due Date	Contract #
18	Submit a work plan to EGLE for review and approval of how the sanitary concerns associated with booster station reservoir roofs will be managed	CLOSED	02/20/2024	N/A	In-house project



Northeast

Items Identified: 4

Item	Description	Status	Closed Date	Due Date	Contract #
13	Replacement of flow and loss of head meters	CLOSED	06/30/2023	N/A	REQ 2102404 JOC Task-063
14	Rehabilitation of the corroded filter troughs through a full-scale filtration project	In Progress	-	12/31/2029	2400083
15	Removal of the lead lining in alum bulk tanks	CLOSED	06/29/2024	N/A	CIP 2100330-2 JOC Task J2-20
24	Repair or replacement of the inoperable flocculation equipment	In Progress	-	03/18/2027	2004549 (CIP 111012)



Springwells

Items Identified: 8

Item	Description	Status	Closed Date	Due Date	Contract #
7	Assurance that filter performance is closely monitored	CLOSED	3/27/2023	N/A	In-house project
8	1930 plant - Completion of a study to determine reason for failed underdrains of 8 filters	CLOSED	12/31/2023	12/31/2023	In-house project
9	1930 plant - Submission of decommissioning of filters	CLOSED	3/27/2023	N/A	In-house project
10	Designation of Operator in Charge (OIC) and back up OIC	CLOSED	3/27/2023	N/A	In-house project



Springwells (continued)

Item	Description	Status	Closed Date	Due Date	Contract #
17	Inspection of Reservoir # 1 interior	CLOSED	6/30/2023	N/A	170800 - Program
22	1930 plant - Installation of rapid mixer(s) or demonstration of adequate mixing intensity G-Value	CLOSED	12/31/2023	N/A	1802774
26	1958 plant - Repair or replacement of inoperable flocculation equipment	In Progress	-	11/11/2027	2201255
27	1930 plant - Design and installation of mechanical flocculation equipment or demonstration through studies that existing design is sufficient	CLOSED	8/31/2023	N/A	1802774



Southwest

Items Identified: 5

Item	Description	Status	Closed Date	Due Date	Contract #
11	Completion of a study to determine reason for failed filter # 20	CLOSED	12/18/2024	N/A	In-house project
12	Submission to EGLE of how the filters will be decommissioned	CLOSED	03/27/2023	N/A	In-house project
16	Work plan for sludge management until mechanical equipment is repaired	CLOSED	03/27/2023	N/A	REQ 2304706



Southwest (continued)

Item	Description	Status	Closed Date	Due Date	Contract #
21	Installation of rapid mixer(s) or demonstration of G-Value	In Progress	-	12/31/2027	TASK J2-34
25	Repair or replacement of the inoperable flocculation equipment	In Progress	-	07/31/2031	2400858



Upcoming Requirements

Items due within the next 7 months:

Item #	Description	Date
20	Installation of rapid mixer(s) or demonstration of 'G' value	05/15/2026

Items in Process

Items due:

Description	Date
Make any changes to corrosion control treatment for all plants	As agreed upon by the parties

Critical Items or Dates of Concern



Location	Item #	Description	Due Date	Concern/Recommendation
Lake Huron	20	Installation of rapid mixer(s) or demonstration of 'G' value	05/15/2026	Emergency Procurement – Pulled out of larger contract and using JOC process