



ADMINISTRATIVE COMPLIANCE AGREEMENT (ACA) UPDATE April 24, 2024

What is an ACA?

- 💧 ACA stands for **Administrative Compliance Agreement** – voluntary legally enforceable
- 💧 It is an agreement between 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	September 6, 2019
Water Works Park Water Treatment Plant	July 14, 2020
Booster Station & Transmission System	January 8, 2021
Northeast Water Treatment Plant	March 4, 2021
Springwells Water Treatment Plant	May 25, 2022
Southwest Water Treatment Plant	August 2, 2022

The Michigan Department of Environment, Great Lakes, and Energy (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.

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	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

Current Submissions

EGLE agrees that submitted items are closed

Total items submitted since signing the ACA – 4 additional items

Date	Item #	Status	New closed items
03/27/2023	1, *2, 3, 6, 7, 9, 10, 12, 16	CLOSED	Report #2
06/30/2023	13, 17, 19	CLOSED	
08/31/2023	27	CLOSED	Springwells floc installation #27
12/31/2023	8, 22	CLOSED	Springwells filter study #8 Springwells floc installation #22

**Item #2 – form for reporting to EGLE approved*

Outstanding Items (Location)

Total Items Remaining – 12

Area	Item #	Description
Common-To-All	4	Submit Corrosion Control Study
	5	Corrosion Control Treatment Changes
Lake Huron	20	G-Value
	23	Flocculator Equipment
Booster Station	18	Roof Plan – Sanitary Concerns
Northeast	14	Corroded Filter troughs
	15	Lining Removal
	24	Flocculator Equipment
Springwells	26	1958 – Flocculator Repair or Rehab
Southwest	11	Filter # 20
	21	G-Value
	25	Flocculators

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

Outstanding Items (Location)

Total Items Remaining – 12

(4 Items scheduled to be closed by December 2024)

Area	Item #	Description	Date
Common-To-All	4	Submit Corrosion Control Study	11/30/2024
	5	Corrosion Control Treatment Changes	TBD
Lake Huron	20	G-Value	5/15/2026
	23	Flocculator Equipment	5/15/2029
Booster Station	18	Roof Plan – Sanitary Concerns	5/31/2024
Northeast	14	Corroded Filter troughs	12/31/2029
	15	Lining Removal	6/30/2024
	24	Flocculator Equipment	3/18/2027
Springwells	26	1958 – Flocculator Repair or Rehab	11/11/2027
Southwest	11	Filter # 20	12/31/2024
	21	G-Value	12/31/2027
	25	Flocculators	7/31/2031

Critical Items of Concern

There are currently no critical items of concern.



Appendix

Expanded Information of ACA Items

Organized by
location then item #

6 - ITEMS IDENTIFIED

Common-to-All Treatment Plant

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	3/27/2023	NA	In-house project
2	Report within 24 hours to EGLE the interim settled turbidity above 2.0 NTU	CLOSED	3/27/2023	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	3/27/2023	NA	In-house project



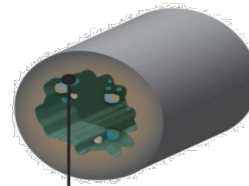
ITEMS IDENTIFIED

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	In Progress	-	11/30/2024	1803705 Arcadis
5	Make any changes to the corrosion control treatment at each of the surface water plant	-	-	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	3/27/2023	NA	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.

8 - ITEMS IDENTIFIED

Springwells

Item	Description	Status	Closed Date	Due Date	Contract #
7	Assurance that filter performance is closely monitored	CLOSED	3/27/2023	NA	In-house project
8	1930 plant - Completion of a study to determine reason for failed underdrains of 8 filters	CLOSED	12/28/2023	12/31/2023	In-house project
9	1930 plant - Submission of decommissioning of filters	CLOSED	3/27/2023	NA	In-house project
10	Designation of Operator in Charge (OIC) and back up OIC	CLOSED	3/27/2023	NA	In-house project



ITEMS IDENTIFIED

Springwells (continued)

Item	Description	Status	Closed Date	Due Date	Contract #
17	Inspection of Reservoir # 1 interior	CLOSED	6/30/2023	NA	170800 - Program
22	1930 plant - Installation of rapid mixer(s) or demonstration of adequate mixing intensity G-Value	CLOSED	12/28/2023	12/31/2023	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	12/31/2027	1802774



5 - ITEMS IDENTIFIED

Southwest

Item	Description	Status	Closed Date	Due Date	Contract #
11	Completion of a study to determine reason for failed filter # 20	In Progress	-	12/31/2024	In-house project
12	Submission to EGLE of how the filters will be decommissioned	CLOSED	3/27/2023	NA	In-house project
16	Work plan for sludge management until mechanical equipment is repaired	CLOSED	3/27/2023	NA	REQ 2304706



ITEMS IDENTIFIED

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	-	7/31/2031	2400858



4 - ITEMS IDENTIFIED Northeast

Item	Description	Status	Closed Date	Due Date	Contract #
13	Replacement of flow and loss of head meters	CLOSED	6/30/2023	NA	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	In Progress	-	6/30/2024	CIP 2100330-2 JOC Task J2-20
24	Repair or replacement of the inoperable flocculation equipment	In Progress	-	3/18/2027	2004549 (CIP 111012)



1 - ITEM IDENTIFIED

Booster Station & Transmission System

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	In Progress	-	5/31/2024	In-house project



1 - ITEM IDENTIFIED

Water Works Park

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	6/30/2023	NA	In-house project



2 - ITEMS IDENTIFIED Lake Huron

Item	Description	Status	Closed Date	Due Date	Contract #
20	Installation of rapid mixer(s) or demonstration of G-Value	In Progress	-	3/15/2026	2004549 (CIP 111012)
23	Repair or replacement of the inoperable flocculation equipment	In Progress	-	5/15/2029	2004549 (CIP 111012)



Questions

