



Wastewater Operating Services
Operations
9300 W. Jefferson
Detroit, Michigan 48209



August 31, 2017

Mr. Stephen Weis
Senior Environmental Engineer
Michigan Department of Environmental Quality
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202-6058

RE: Violation Notice SRN: N7584, N7704, N7879, Wayne County Dated August 14, 2017

Dear Mr. Weis:

Great Lakes Water Authority (GLWA) is in receipt of the referenced Violation Notice from the Michigan Department of Environmental Quality (MDEQ) regarding special conditions of Permit to Install (PTI) 69-06 (Baby Creek Screening and Disinfection Facility), PTI 291-06 (Oakwood Combined Sewer Overflow (CSO) Retention Treatment Basin (RTB)), and PTI 333-07 (Belle Isle CSO RTB). Please find below GLWA's response to the cited violations and our plans to address compliance with these conditions:

1. Baby Creek Screening and Disinfection Facility (PTI 69-06)

Rule/Permit Condition Violated: Special Conditions 1.5, 1.7, and 1.8

MDEQ Comments: The odor control system at this facility is not equipped with a device to monitor the air flow through the carbon reactor system.

The odor control system at this facility was designed and equipped with a device to monitor the pressure loss (differential pressure) through the carbon reactor. This device allows staff to determine if air flow through the system is restricted which would result in an increase in differential pressure. Since the inspection on August 2, GLWA has connected the output signal from this device to our Supervisory Control and Data Acquisition (SCADA) System which calculates an air flow measurement through the carbon reactor. GLWA completed this work on Friday, August 11 and shared a screenshot of the monitoring system for recording this information with you on the same day. GLWA will calibrate, maintain and operate this device in a satisfactory manner on a continuous basis.

2. Oakwood CSO RTB (PTI 291-06)

Rule/Permit Condition Violated: Special Conditions 1.5, 1.6, 2.5, and 2.6

MDEQ Comments: The activated carbon beds associated with the odor control devices at the facility are not being monitored for breakthrough in accordance with the requirements of the PTI.

Staff have consulted with Continental Carbon Corporation regarding the activated carbon beds located at the Oakwood CSO RTB. GLWA staff will be collecting a sample prior to September 30 and sending it to Calgon Corporation for determination of remaining bed life. Subsequently, GLWA will continue to collect and analyze a sample quarterly, and will maintain records of the test results.

3. Belle Isle CSO RTB (PTI 333-07)

Rule/Permit Condition Violated: Special Conditions 1.5 and 1.6

MDEQ Comments: The activated carbon bed associated with the odor control device at the facility is not being monitored for breakthrough in accordance with the requirements of the PTI.

Staff have consulted with Continental Carbon Corporation regarding the activated carbon beds located at the Belle Isle CSO RTB. GLWA staff will be collecting a sample prior to September 30 and sending it to Calgon Corporation for determination of remaining bed life. Subsequently, GLWA will continue to collect and analyze a sample quarterly, and will maintain records of the test results.

Should you require further information regarding our response to the violation notice, please contact me at 313-297-4301 or via email at Majid.Khan@glwater.org

Sincerely,



Majid Khan
Director – Wastewater Operations

MK/lb

Cc: Ms. Lynn Fiedler, DEQ,
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Ms. Karen Kajiya-Mills, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Raymond Scott, City of Detroit, BSEED
Mr. Paul Max, City of Detroit, BSEED
Ms. Sue McCormick, GLWA
Mr. William Wolfson, GLWA
Ms. Suzanne Coffey, GLWA
Ms. Lavonda Jackson, GLWA
Mr. Daniel Alford, GLWA
Mr. Chris VanPoppelen, GLWA
Mr. Luther Blackburn, GLWA
Mr. Mark Ragsdale, GLWA
Mr. Sajit George, GLWA
Mr. Vijay Valecha, GLWA
Mr. David McCord, GLWA
Mr. Edward Hogan, Wade-Trim