

FACT SHEET

PERMITTEES: City of Detroit Water and Sewerage Department and Great Lakes Water Authority

SITE NAME: GLWA WRRF

COUNTY: Wayne

DESCRIPTION OF EXISTING WASTEWATER TREATMENT FACILITIES

The City of Detroit resolved its municipal bankruptcy in 2014. As part of the resolution, the Great Lakes Water Authority (GLWA) was formed to operate the regional water and wastewater systems in Southeast Michigan including the former Detroit Wastewater Treatment Plant, now known as the GLWA Water Resource Recovery Facility (WRRF). The Detroit Water and Sewerage System (DWSD) still exists, but now operates the local combined sewers within the City of Detroit. DWSD is now a customer of the GLWA as are the other contributing regional systems serving 76 communities. The City of Detroit still owns the regional interceptor system and the GLWA WRRF. The regional interceptors and the GLWA WRRF are fully operated by the GLWA.

The City of Detroit and some of the surrounding communities have combined sewer systems. As a result, flows to the WRRF are significantly higher than average daily flows when there are storm events. The sustained peak primary treatment capacity for wet weather flows is 1,700 million gallons per day (MGD) and the sustained peak secondary treatment capacity for wet weather flows is 930 MGD (including 60 MGD for plant recycle water). All dry weather flows and a significant amount of wet weather flows receive full secondary treatment at the WRRF. Flows from the WRRF are discharged to the Detroit River and Rouge River. During wet weather there are also untreated Combined Sewer Overflow (CSO) discharges to the Rouge River and Detroit River, and treated CSO discharges to the Detroit River, the Rouge River, and Conner Creek. The CSO control program will be described later in this fact sheet.

The plant was originally constructed in 1940 and now includes:

- raw wastewater pumping at Pump Stations 1 and 2 that receive flow from three interceptors: the Oakwood – NW Interceptor; the North Interceptor – East Arm; and the Detroit River Interceptor,
- primary treatment using 12 rectangular and 6 circular clarifiers,
- secondary treatment using 4 high-purity oxygen-activated sludge tanks and 25 secondary final clarifiers,
- phosphorus removal using Ferric Chloride and operation of the pure oxygen activated sludge tanks,
- chlorination and dechlorination of the final effluent,
- gravity thickening of the solids generated during primary and secondary treatment,
- dewatering of the thickened solids using both centrifuges and belt filter presses,
- incineration of a portion of the dewatered solids, and
- offloading of the remainder of the dewatered solids (after lime addition) to trucks for either land application or landfill disposal.

Previous issuances of this NPDES permit contained schedules of compliance for the design, construction, and operation of an outfall to the Rouge River to provide for disinfection of the discharge of intermittent primary treated wet weather flows. Originally, the design and construction of a second Rouge River outfall was proposed (outfall 084 (RRO2)). On November 14, 2014, a permit modification request was submitted to the Department of Environment, Great Lakes, and Energy (Department) by the DWSD. The DWSD and the GLWA investigated alternate means of achieving disinfection for all flows treated by the facility. Upon completion of two concurrent studies addressing bench-scale disinfection testing and hydraulic analyses, DWSD and GLWA submitted to the Department the document titled "Rouge River Disinfection Alternative at the Detroit WWTP" dated August 26, 2014. This alternative would result in secondary treated flow and excess primary treated flow during wet weather events being discharged from the Detroit River Outfall 049 (DRO) up to the hydraulic capacity of the DRO. Once the capacity of the DRO is reached, secondary treated flow will be discharged from the Rouge River Outfall 050 (RRO), and excess secondary and primary treated flows will be discharged from the DRO. Wet weather flow discharged from the RRO had been treated using preliminary and primary treatment, but was not disinfected.

The Rouge River Outfall Disinfection Project became fully operational on March 29, 2019. With the completion of the RRO disinfection project at the GLWA WRRF and commencing final use of Outfall 050, the permittees have completed the core elements of their CSO control program and have achieved a very high level of CSO control, determined to routinely achieve adequate treatment of 95% of the annual combined sewer volume to the collection system. Untreated CSO has been reduced from an annual average of 20 – 25 billion gallons per year (BGY) before submittal of the Long-Term CSO Control Program (LTCP) in 1993 to a current predicted estimate of less than 0.8 BGY in 2025 (varies depending on precipitation). The GLWA WRRF treats roughly 296 BGY to secondary or primary levels. Note that of the volume of wet weather flow in the GLWA tributary system that flows into or is developed in Detroit (excess sanitary and combined flows), 8 BGY is primarily treated and discharged at the WRRF, 5 BGY is treated in DWSD CSO treatment facilities, and less than 0.8 BGY is discharged as untreated CSO in Detroit to the Rouge River or Detroit River, with the rest receiving secondary treatment. This remaining 0.8 BGY still is significant and needs to be corrected/treated to meet WQS. This permit includes an adaptive management program to continue to address the remaining non-core CSOs that contribute an average of less than 0.8 BGY of untreated discharge.

Two flow diagrams follow. Figure 1 represents facility operations prior to completion of the Rouge River Outfall Disinfection Project. Figure 2 reflects current facility operations.

Figure 1: Facility Operations prior to completion of RRO Disinfection Project

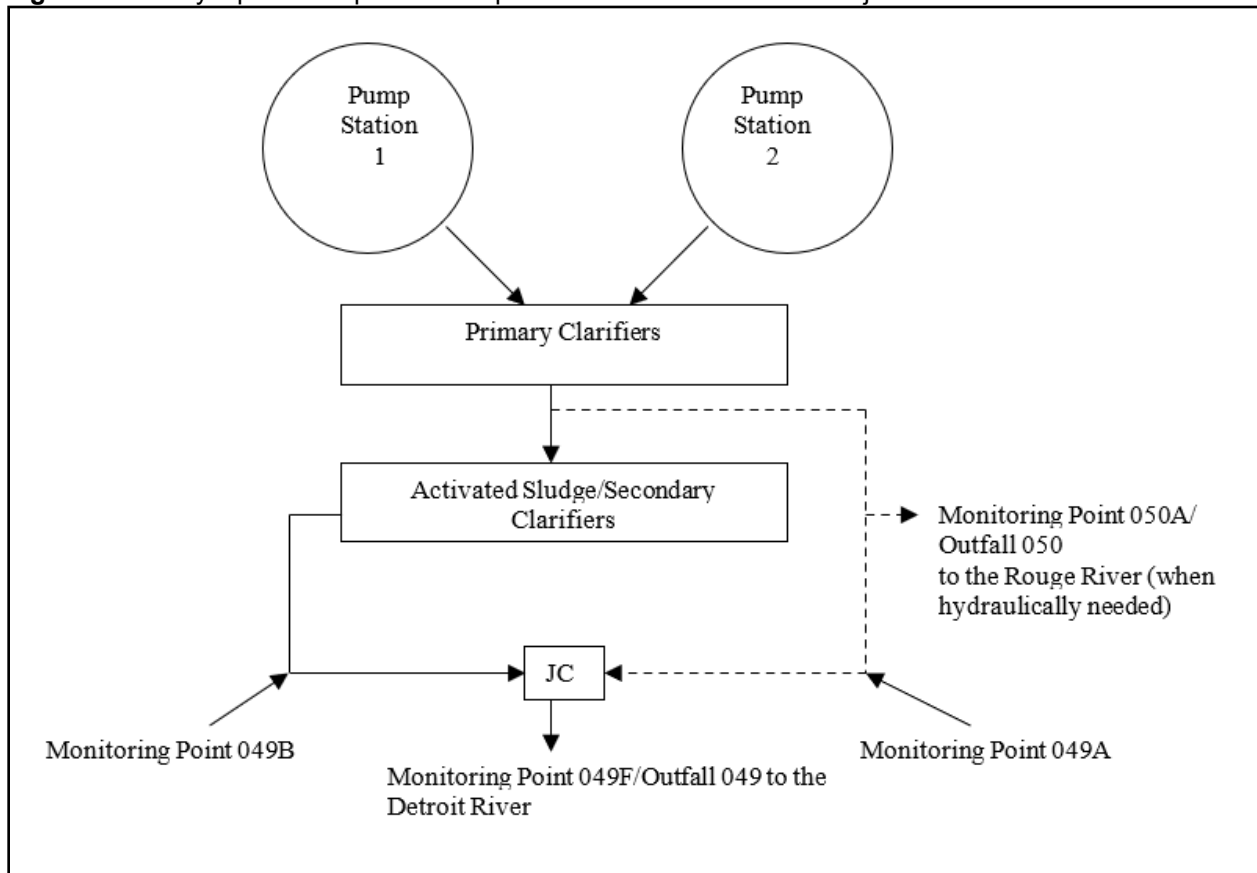
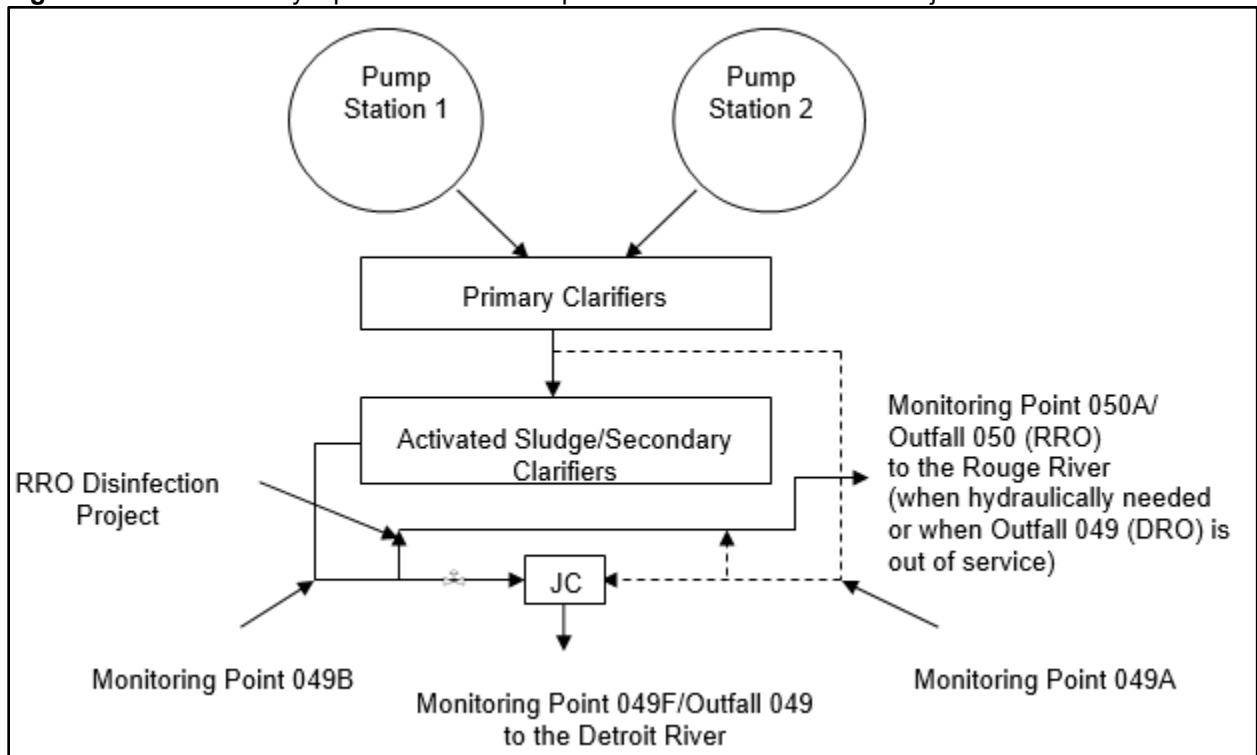


Figure 2: Current Facility Operations after completion of RRO Disinfection Project



As stated above, the WRRF's sustained peak primary treatment capacity for wet weather flows is 1,700 MGD (raw), and the sustained peak secondary treatment capacity for sanitary and wet weather flows is 930 MGD (including recycle). During dry weather, flows up to 930 MGD (minus recycle) that are conveyed to the plant receive primary and secondary treatment (plus disinfection/dechlorination) and are discharged through Outfall 049 (DRO) to the Detroit River. Flows greater than 930 MGD and up to 1,700 MGD receive primary treatment. During wet weather events, up to 830 MGD of secondary treated flow from Monitoring Point 049B will be disinfected and routed to Outfall 050 (RRO) and the Rouge River. The remaining secondary treated flow and primary treated wet weather flow up to the hydraulic capacity of the DRO will be disinfected and routed to Outfall 049 (DRO) and the Detroit River. All flow through the WRRF is now disinfected and dechlorinated consistent with the USEPA CSO regulations and State of Michigan Water Quality Standards (WQS).

The fact sheet for the 2013 permit reissuance included information about the legal framework for the routing and treatment of wet weather flows at the WRRF. Title 40 of the Code of Federal Regulations (40 CFR), Subpart 122.41(m)(1), defines "bypass" as "the intentional diversion of waste streams from any portion of a treatment facility." Under the United States Environmental Protection Agency's (USEPA's) regulations, such diversions are generally prohibited except under specified limited circumstances. One such circumstance is where the permittee demonstrates that: (1) the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; (2) there was no feasible alternative to the bypass; and (3) the permittee has submitted the required notices. The bypass regulation specifies that a permitting authority may approve an "anticipated bypass" where the record demonstrates that these three conditions will be met, but only after consideration of adverse effects. How 40 CFR 122.41(m) is applied to CSO-related bypasses is specifically discussed in the USEPA's April 1994 CSO Control Policy (c.7 "Maximizing Treatment at the Existing POTW Treatment Plant"). This policy was incorporated into Section 402 of the Clean Water Act (dated November 27, 2002) by reference. The 2013 fact sheet documented that the criteria specified in the USEPA's CSO Policy for approval of CSO-related bypasses in the permit have been met by the permittee.

The Department and the permittees have evaluated the feasibility of providing additional secondary treatment at the WRRF. Resulting from full-plant evaluations of the WRRF during the Long-Term CSO Planning effort, the capacity of secondary treatment was increased to 930 MGD (including recycle). This amount of secondary treatment also has been shown to meet secondary treatment limits for flows greater than the peak dry weather flow, plus an appropriate quantity of wet weather flows. There is currently no additional space at the plant where additional secondary capacity could be constructed. The Department determined there are no feasible alternatives for providing secondary treatment to flows greater than 930 MGD. If flows above 930 MGD were routed through the secondary units, this would result in wash out of the WRRF's secondary treatment system (the criteria described in the USEPA CSO Control Policy).

The Department analyzed the effects of providing primary treatment for the increment of flows greater than 930 MGD and up to 1,700 MGD and determined that these discharges in wet weather, with the treatment being provided, conform with Michigan WQS. The Department has found the discharges will not result in degradation of the Detroit River, the Rouge River, or Lake Erie. Therefore, in accordance with the USEPA's CSO Control Policy (as incorporated into the Clean Water Act) and 40 CFR § 122.41(m)(1), the Department approved the discharge of treated CSO flows through the Rouge River Outfall and the Detroit River Outfall.

1. Measures to ensure sustained long-term permit compliance

The GLWA WRRF had periods of violations of its NPDES permit limits and conditions over several decades and remained under an active federal consent judgment issued by the United States District Court (Eastern District of Michigan) until the order was terminated in 2013. After one period of violations from 1997 through 1999, a second amended consent judgment was issued in 2000. These violations largely resulted from high solids inventories accumulating at the WRRF. The high solids inventories resulted from ineffective operations to dewater solids and remove them from the WRRF. The second amended consent judgment, in part, resulted in the repair, rehabilitation, and replacement of WRRF equipment in the liquid, solids, and utility areas from 2000 to 2005. The WRRF was then in substantial compliance with its NPDES Permits from 2000 until mid- 2009. Violations again started in September 2009 and continued until November 2011. This led to issuance of an Administrative Consent Order (ACO) between the GLWA, DWSD (and the City of Detroit), and the Department in July 2011. As was the case in the late 1990s, the immediate cause was high solids inventories in the WRRF. Initial violations were for total suspended solids (TSS) at the secondary treated monitoring point (049B) through January 2010. Violations then shifted to the intermittent monitoring points (049A and 050A) that discharged wet weather flow, and included TSS and mercury/PCBs that were associated with the higher concentrations of TSS.

The resulting ACO was structured to ensure reliable capacity of sludge dewatering, conveyance, and disposal in the near- and long-term and, most importantly, ensure proper maintenance, staffing, capital improvement, and purchasing for the DWSD for sustained long-term compliance. Since the ACO was issued, and the permit included these conditions in 2013, the WRRF has maintained substantial compliance and not recycled solids. Important portions of these conditions are maintained in the current reissued permit.

The permit continues to require a Facilities Improvement Program that includes important elements from the ACO to address proper operation and maintenance of solids dewatering, conveyance, and disposal in the near- and long-term. In addition, the Facilities Improvement Program includes a requirement to continue to develop an Asset Management Program and implement it as approved by the Department. Annual status reports of the Asset Management Program will continue to be submitted to the Department. The requirements of an Asset Management Program contain goals of effective performance, adequate funding, and adequate operator staffing and training. Asset Management is a planning process focused on gaining optimum value for each asset and providing the financial resources to rehabilitate and replace them when necessary; and typically includes five core elements that identify the current state of the asset, the desired level of service, the most critical asset(s) to sustain performance, the best life-cycle cost, and the long-term funding strategy to sustain service and performance. The Department believes that this Asset Management Program is critical to reducing the likelihood that the GLWA WRRF will again fall into a period of permit violations. To date, the GLWA has expended significant effort to complete this Asset Management Program, and progress continues to be made.

2. Reduction in permitted Total Phosphorus discharged from the GLWA WRRF

This permit continues the tighter controls on effluent phosphorus first put into place in the permit reissued in 2013. This is consistent with the Annex 4 Domestic Action Plan (DAP) that the State of Michigan developed under the Great Lakes Water Quality Agreement (GLWQA). The GLWA WRRF consistently removes 400 metric tons (MT) of total phosphorus annually from wastewater that eventually discharges to Lake Erie. Michigan did not meet its DAP goal of a 40 percent phosphorus loading reduction by 2025; however, GLWA efforts have dramatically helped Michigan achieve 400 MT of this responsibility.

Beginning in fall of 2024, GLWA increased the amount of orthophosphate used in their drinking water distribution system to help prevent corrosion of lead service lines until these service lines can be removed. However, the addition of orthophosphate increases the amount of phosphorus in the service area's wastewater. The Department desires to focus on reasonable and cost-effective controls to continue to reduce phosphorus loading. Part I.A.13. Total Phosphorus Evaluation requires the permittee to determine the ability of the facility to reliably meet a growing season average limitation for total phosphorus during April through September of 0.5 mg/l. Acknowledging the impacts the addition of orthophosphate has on the WRRF's ability to reduce concentrations of total phosphorus, this requirement

does not trigger until after lead service lines have been removed from the permittees' service area and orthophosphate levels in the drinking water distribution system have been reduced.

3. CSO Correction Program History

The City of Detroit has made significant progress implementing the LTCP that was first submitted in 1996, with approved elements first embodied in the 1997 NPDES permit. Revisions to LTCP plans and scheduled projects were made and included in the 2003 NPDES permit, and again in the 2007 NPDES permit. Well over \$1.2 billion has been spent to date on the control of CSO discharges from Detroit outfalls. In 2009, a process was started to again revise the LTCP due to the City's deteriorating financial condition, reflecting national and regional economic conditions. A Financial Capability Assessment (FCA) was completed and indicated that the CSO correction program was a high burden to the City of Detroit residents. After a great deal of discussion, the Department was able to approve an alternative LTCP in 2010 that reduced the City's financial obligations to CSO control while still ultimately providing adequate treatment of CSOs to meet WQS at times of discharge. This alternative LTCP was included in a 2011 modification of Detroit's NPDES Permit. The updated LTCP and the permit requirements also included a Green Infrastructure component. Another FCA was submitted by the DWSD in 2012 as required by the NPDES permit. The FCA again documented that costs associated with continued implementation of the CSO correction program were a high burden to the City of Detroit residents. Reflecting the 2012 FCA and updated costs for effectively operating the WRRF and other facilities, and taking into account opportunities to use Green Infrastructure and apply adaptive management, the 2013 permit again revised the DWSD CSO Control Program. In 2017, another FCA was submitted. The most recent FCA again showed that the CSO correction program is a high burden to City of Detroit residents. This permit issued to the GLWA and the DWSD makes additional changes to the correction program but maintains the existing 2037 final date for correction of remaining high priority CSO outfalls. This date may be extended in subsequent permits if agreed upon by the permittees and the Department. The required submittal of a Phase II CSO Control Plan which, in turn, may be impacted by completion of ongoing studies such as the United States Army Corps of Engineers' Southeast Michigan Flood Risk Management Feasibility Study, may inform and/or justify any proposed extensions.

Previous Long-Term CSO Control Program Documents include: Original Long-Term CSO Control Plan (1996); Long-Term CSO Control Plan Update (2002); Amendment Rouge (2008); Amendment Detroit (2008); Evaluation of CSO Control Alternative (for the Upper Rouge Outfalls) (December 15, 2009); and Supplemental Report on Alternative CSO Controls for the Upper Rouge Outfalls) (April 30, 2010).

Detroit's LTCP has focused on: 1) bringing as much wet weather flow as is feasible to the WRRF for treatment; 2) using in-system storage in the combined collection system (large flat sewers are available for storage); and 3) storing/treating priority CSOs on the collection system using Retention Treatment Basins (RTBs) and screening and disinfection facilities.

The Department requires that all CSOs be corrected to provide adequate treatment to meet all WQS at times of discharge. Therefore, treatment of combined sewage, or elimination of combined sewage by sewer separation, can be acceptable alternatives. Green Infrastructure and other source control approaches can help reduce flows into the sewer system during storm events, also helping to reduce CSOs.

For the CSO outfalls discharging to the Rouge River, the development and implementation of the CSO Control Programs for the various outfalls was initially established based upon the goals of the Rouge River Remedial Action Plan (RAP), which called for a phased approach to solving the water quality problems of the river. Phase I of the Rouge River RAP extended to 1993 and included 1) monitoring and optimization of the existing combined sewer system, 2) detailed local planning for CSO controls and 3) resolution of financing and institutional problems. Phase II of the Rouge River RAP extended to 2005 (2012 for a few limited outfalls) and called for facility construction based on the goal of protection of public health through the elimination of raw sewage discharges and the control of toxic pollutants. Phase III of the Rouge River RAP follows completion of Phase II facilities and includes further improvements, if necessary, to comply with WQS at the time of discharge. Due to the demonstrated financial capability of the permittees for City of Detroit residents in 2009, 2012 and 2017, the CSO Control Program for the CSOs discharging to the Rouge River has been revised as reflected in the permit.

For the CSO outfalls discharging to the Detroit River and the Old Channel of the Rouge River, Department approval of the CSO Control Programs is determined on a case-by-case basis with considerations for environmental impacts, public health impacts, technical feasibility, and economic affordability. As was the case for the Rouge River program, the demonstrated financial capability of the permittees for City of Detroit residents in 2009, 2012 and 2017 also affected the CSO Control Program for the Detroit River and the Old Channel of the Rouge River, and has been revised as reflected in the permit.

In addition, the CSO Control Program now includes significant Green Storm water Infrastructure (GSI) requirements that are an important component of the approved Long-Term CSO Control Program. Significant progress to date includes completion of:

- Additional facilities at the WRRF (i.e., two 180-MGD primary clarifiers, an additional influent pump in pump station 2) that have increased the capacity to treat combined wet weather flows to primary treatment levels as required by the NPDES permit (capacity now 1,700 MGD as compared to the previous 1,200 MGD). Now, billions of gallons per year of formerly untreated CSOs from upstream in the collection system are treated at the WRRF.
- Five CSO Storage/Treatment Facilities along the Rouge River. These include the Seven Mile RTB (2.2 MG), the Puritan-Fenkell RTB (2.8 MG), the Hubbell-Southfield RTB (24 MG), the Baby Creek Screening and Disinfection Facility (screens and disinfects all CSO flow ~5000 cfs peak), and the Oakwood RTB (9 MG).
- Four CSO Storage/Treatment Facilities along the Detroit River. These include the Conner Creek RTB (30 MG), the Belle Isle RTB (0.3 MG), the Leib Screening and Disinfection Facility (screens and disinfects all CSO flow ~1,500 cfs peak), and the St. Aubin Screening and Disinfection Facility (screens and disinfects ~250 cfs peak).
- Six in-system storage gates at CSO outfalls along the Rouge River.
- Thirteen in-system storage devices within the collection system. These are inflatable dams in large sewers. Eleven of the 13 are in combined sewers that are tributary to the Detroit River CSOs, and two are in combined sewers that are tributary to the Baby Creek CSO Facility.
- Rehabilitation of pump stations and regulators along the Detroit River.
- Completion of the instrumentation/control system that determines CSO flows and discharge times for the remaining untreated CSOs. This instrumentation and control system also has many other functions for both the wastewater and water systems.
- Completion and several revisions to collection system hydraulic models used for LTCP planning and specific project design.
- Completion of additional control facilities or elimination of outfalls for five CSOs in the lower Rouge River.

4. CSO Correction Program Revisions to Permit Requirements

Disconnection of Eaves Troughs and Roof Downspouts

The requirements relating to the disconnection of Eaves Troughs and Roof Downspouts has been revised in this permit to align with similar requirements in other Michigan CSO and RTB NPDES permits. The previous permit specified the following:

The permittees shall eliminate direct connections of eaves troughs and roof downspouts to the sewer system throughout the service area tributary to the Upper Rouge CSO outfalls (Outfalls 059-069, 072-075, 077, and 079). This requirement shall be completed for residential property and commercial and industrial properties or as approved by the Department consistent with the permittees' implementation of the Green Storm Water Infrastructure program. In addition, the permittees shall eliminate direct connections of eave troughs and roof downspouts in the service areas tributary to the CSO RTBs, to the CSO Screening & Disinfection Facilities, and to the remaining untreated CSOs based upon the plan detailed in the revised Long-term Control Program. This requirement does not apply if the permittees demonstrates that the disconnection of eaves troughs and roof downspouts is not a cost-effective means of reducing the frequency or duration of combined sewer overflows or of maintaining compliance with this permit. Such a demonstration and supporting documentation shall be submitted to the Department for approval.

Green Stormwater Infrastructure (GSI)

DWSD has invested over \$50 million dollars in GSI projects in the Detroit collection system from 2009 to the present. Based on the progress the permittees' have made implementing GSI projects, GSI permit requirements have been revised. The previous permit specified the following:

For the west side of the City, there is a GSI program in the tributary area to Rouge River Outfalls 059-069, 072-075, 077, and 079. DWSD had developed and implemented a Department approved GSI Plan for this area consistent with the "Evaluation of CSO Control Alternatives" report dated December 15, 2009. The GSI Plan describes a process for locating, designing, constructing, operating, and evaluating GSI in these sewersheds. The Plan includes the following elements:

- (1) Provisions for disconnection of residential downspouts and disconnection of commercial and industrial downspouts where feasible.
- (2) Provisions for demolition and removal of vacant structures and replacement with pervious land cover. Where demolition is planned and implemented at sites that will be re-purposed for GSI, the demolition specifications shall ensure that basements and other impervious surfaces at the sites are removed, that the site is raked to remove large rocks and construction debris, and that engineered soils consisting of an appropriate mix of topsoil, compost, and sand is applied following the demolition to support plant growth and promote infiltration.
- (3) Provisions for installation of bioswales along roadways and parking lots to intercept runoff and reduce storm water inputs to the combined sewer system from impervious surfaces.
- (4) Provisions for installation of GSI and/or BMPs at commercial and residential properties to capture and retard storm water runoff.
- (5) Provisions for tree planting for uptake and evapotranspiration along roadways and open spaces.
- (6) Provisions for other GSI implementation projects as determined to be appropriate.
- (8) Processes for public outreach and public participation in selecting sites and implementing GSI practices.
- (9) Procedures/methods for tracking GSI implementation and measuring effects.

(10) Provisions for ensuring appropriate maintenance of sites where GSI has been implemented, including roles and schedules for maintenance.

(11) Provisions for ensuring storm water management (runoff reduction) benefits associated with GSI implementation continue over time, even as redevelopment may occur in the sewersheds.

The permittees shall continue to implement GSI in these sewersheds. The investment in GSI in these sewersheds shall be an average of 3 million dollars per fiscal year for the ten-year period ending 2019 (for a total of \$30 million), and an average of 2 million dollars per year for the following 10 years (for a total of \$20 million). GSI implementation will be in accordance with the GSI Plan.

For the near-east side of the City, there has been another GSI program in the tributary area to Detroit River Outfalls 005 - 009, 011, and 012. Because of the potential for some larger-scale green projects due to a relatively large amount of vacant land in the area, it may be possible to eliminate or reduce the size of some previously envisioned CSO treatment facilities for this area using the combination of GSI implementation along with possible sewer separation, and other engineering solutions. With GSI implementation now spreading across the city, it is acceptable for the city to use one-third (1/3) of the total GSI expenditures on projects upstream of untreated CSOs other than Rouge River Outfalls 059-069, 072-075, 077, and 079.

Stormwater Control

In November of 2018, the permittees created and enacted the Post Construction Stormwater Ordinance for the City of Detroit. DWSD developed and published the Stormwater Management Design Manual in conjunction with the ordinance being enacted. This ordinance applies to all areas of the City of Detroit.

The Michigan Department of Transportation (MDOT), as part of the requirement to meet the City of Detroit Stormwater Ordinance for the Ford Freeway Interstate 94 project, is funding a Pilot CSO Treatment Facility project for CSO outfalls that discharge to the Detroit River as an alternative compliance option for the segment from Burns Avenue to Barrett Avenue.

Based on these actions, the following permit language was not carried forward in the reissued permit:

On or before April 1, 2018, (submitted) the permittees shall submit to the Department for review and approval a storm water control requirement for areas of new development and/or redevelopment. This storm water control requirement is primarily a focus within the Rouge Sewer District and Central Sewer District, as it is these two Districts that have untreated CSOs. Therefore, the permittees shall propose a level of storm water control for new development and redevelopment in these two sewer districts, and for the circumstances stated above, that is designed to help further reduce the volume and frequency of untreated CSO discharges, and a procedure and schedule for implementing this control requirement.

CSO Control Program Schedule

Based on projects completed to date, updates made to Phase I CSO Control Program requirements, and the required submission of Phase II, the following permit requirements have not been carried forward in this reissued permit:

- 1) **West-side Model; Rouge River Outfalls 059-069, Outfalls 072-075, Outfall 077, and Outfall 079.** For untreated combined sewer overflows from Outfalls 059-069, Outfalls 072-075, Outfall 077, and Outfall 079, the permittees shall determine the accurate frequency and volume of untreated CSO discharges and amend the "Supplemental Report on Alternative CSO Controls for the Upper Rouge River," dated April 30, 2010 according to the following schedule:
 - a) The work plan has been approved by the Department that (1) sets forth the monitoring of the 17 CSOs that will be accomplished to accurately determine the frequency and volume of these untreated CSO discharges, (2) uses this monitoring along with the current Ovation monitoring as appropriate in a calibrated and verified model to accurately detail the volume and frequency

of the 17 CSOs during a representative and typical 10-year period of rainfall record, and (3) to determine the peak hour flow at the 10 yr – 1 hr event of each of the 17 CSOs. The permittees shall continue to implement the approved work plan.

- b) On or before **April 15, 2019**, (submitted) the permittees shall submit a report to the Department for review and approval that summarizes the determination and provides the volume and frequency of these 17 CSOs over a representative and typical 10-year period of rainfall record and provides the peak hour flow at the 10 yr – 1 hr event for each of these 17 CSOs;
 - c) On or before **November 15, 2022**, the permittees shall submit an amendment for Department review and approval to the “Supplemental Report on Alternative CSO Controls for the Upper Rouge River” (dated April 30, 2010) that describes any changes to the recommended long-term CSO control projects for the 17 CSOs. This plan may propose an alternative to the use of 10 minutes of detention at the 10 year – 1 hour event, at the permittees’ discretion;
- 2) Near eastside; **Detroit River Outfalls 005-009, 011, and 012**. The permittees shall develop a revised CSO Control Plan for this tributary area in accordance with the following schedule:
- On or before **November 15, 2022**, the permittees shall submit to the Department for review and approval an update to their Long-term CSO Control program (Detroit update 2008) for providing elimination or adequate treatment of CSO Outfalls 005-009, Outfall 011, and Outfall 012 to meet water quality standards at times of discharge. This plan shall consider the GI recommendations and potential for storm water reduction from the completed 205(j) report for this area. This plan may propose an alternative control requirement for the Long-term CSO control program.
- 3) The permittees may choose to offer an entire updated Long-term CSO Control program for all Detroit River CSOs. This updated plan can include a totally revised Detroit update (2008) for all remaining CSOs. Note that CSOs can be prohibited, eliminated, or adequately treated to meet water quality standards at times of discharge. If the permittees decide to pursue this approach, then the revised plan is due on or before **November 15, 2022**, for Department review and approval.

5. CSO Correction Program Moving Forward (repeated from the permit for clarity)

CSO Control Projects

1) Pertinent CSO Program History

The permittees are continuing to implement CSO Control Programs for the various CSO outfalls that discharge to the Rouge River and the Detroit River. Depending upon the particular CSO Control Program and outfall, the permittees are required to provide for the prohibition, elimination, or adequate treatment of combined sewage discharges containing raw sewage, to comply with the Water Quality Standards at times of discharge.

The implementation and completion of the CSO Control Program indicated in Part I.A.18.f. and g. are a necessary and essential requirement of this permit.

2) CSO Correction Program Moving Forward

The permittees shall control remaining combined sewer discharges, that are not classified as either extreme or minimal (see Part I.A.18.a.5) & 6)), to eliminate the discharges or provide adequate treatment of the combined sewage discharges to comply with Water Quality Standards at times of discharge. Additional CSO control measures are needed to fully comply with Michigan’s Water Quality Standards and it is appropriate to plan and schedule the remaining

control measures, taking into account what has been put in place to date and lessons learned, the unique technical and financial situation of the city of Detroit, and the nature of the remaining CSO challenges. Additionally, the Permittees shall consider the most recent Wastewater Master Plan dated June 2020 and any subsequent updated Wastewater Master Plans when developing elements for the CSO Correction Program.

The permittees shall proceed with remaining CSO corrections using an adaptive management approach. This means that as new information is gained from: (1) evaluation of existing CSO projects and new treatment technologies, (2) evaluation of real-time collection system controls, (3) more accurate and complete data on CSO discharge frequency and volume, (4) benefits of less flow to the collection system from green stormwater infrastructure (GSI), (5) benefits of less flow to the collection system due to the City's drainage charge program and new stormwater ordinance, (6) benefits of less flow to the collection system as the City continues its sewer rehabilitation program, and (7) any other pertinent information, future CSO controls can be adapted to best provide cost-effective elimination of discharges, adequate treatment of discharges, or classification of discharges as minimal or extreme.

The permittees shall propose the non-core CSO correction projects to be designed, constructed, and operated to provide CSO elimination or adequate treatment during the subsequent five-year permit cycle, with each permit reapplication beginning in April 2022. High priority non-core outfalls should generally be addressed first, and outfalls thought of as high priority can change at any time due to implementation of the adaptive management approach. City of Detroit residents within the City of Detroit Water and Sewerage Department (DWSD) service area are "high burden" status based on sewer fees paid as a percentage of median annual household income. Planning of CSO control measures may reflect the permittees' financial capacity for City of Detroit residents determined in the Financial Capability Evaluation that is submitted with each permit reapplication. At each application submittal through the duration of the CSO correction program, the projects proposed shall include an updated Financial Capability Evaluation that may also include other financial factors as appropriate. Reissued permits will then be drafted and issued with schedules for approved CSO correction projects that provide continuing progress toward meeting water quality standards. The permittees shall prepare an evaluation of Financial Capability, consistent with state and federal guidance, and shall submit the evaluation with the applications for reissuance of this permit (see the cover page of this permit for the next application due date). The Financial Capability Report shall be in the form of previous reports utilizing the EPA Financial Capability Guidance Document (USEPA 832-B-97-004; February, 1997), and updated with information as may be available in order to assess the permittees' ability to undertake future capital improvement projects related to the Long-Term CSO Control Program. This permit may be modified in accordance with applicable law and rules to incorporate revisions to conform to pertinent laws or rules, or as necessary to address prevailing situations.

Based on information currently available, the following are lists by water body that are high priority CSOs that require control. These outfalls can be revised at any time by the permittees or the Department, reflecting adaptive management considerations. While either the permittees or Department can propose changes at any time, an agreement between the two parties is required and shall be made in writing. The goal will be to complete projects fully addressing all high priority outfalls before October 1, 2037.

Rouge River non-core CSOs (these can be changed by mutual agreement between the permittees and the Department)

High Priority Outfalls
059, 061, 064, 065, 074

Detroit River non-core CSOs (these can be changed by mutual agreement between the permittees and the Department)

High Priority Outfalls
005, 007, 009, 012, 022, 025, 031, 038

3) Adaptive Management Program for this Permit

The adaptive management approach for this permit looks at the (1) evaluation of existing CSO projects and new treatment technologies, (2) evaluation of real-time collection system controls, (3) more accurate and complete data on CSO discharge frequency and volume, (4) benefits of less flow to the collection system from green stormwater infrastructure (GSI), (5) benefits of less flow to the collection system due to the City's drainage charge program and new stormwater ordinance, (6) benefits of less flow to the collection system as the City continues its sewer rehabilitation program, and (7) any other pertinent information. The permittees shall use the above measures, as appropriate, to further reduce untreated CSO discharges on an ongoing basis from the collection system to inform projects planned for the Phase II LTCP.

On or before **April 1 of each year**, the permittees shall prepare a Progress Report that summarizes significant real time controls that occurred during the previous calendar year. The report shall summarize the total benefits from all programs by including: a) an updated estimate of the annual volume of wet weather flow that has been removed from the combined sewer system; b) the resulting frequency, volume, and duration of CSO discharges (based on actual monitoring); and c) the predicted change modeled continuously and at design events to frequency, volume, and duration of CSO discharges based on the calibrated hydraulic model developed in the Master Plan effort. The report shall reference the CSO discharge report submitted under Part I.A.18.d.13) of this permit and include the pertinent data as a reference.

A more complete description of the adaptive management approach includes:

a) Real-time Control

The GLWA is in the process of determining if real-time control can be used to help further minimize or even eliminate some untreated CSO discharges. One real-time control mechanism currently in place is the Interim Wet Weather Operations Plan (IWOP). The operational changes agreed to between the permittees and the Department in the IWOP will be reported in the Operational Plan Annual Update (Part I.A.18.d.). The IWOP identifies critical system regulators, gates, pumps, etc., that can be adjusted to allow for more treated CSO, and less untreated CSO from the remaining untreated CSO outfalls. Approved adjustments will be at least acceptable until completion of all non-core CSO correction projects and shall be included in Operational Plan Annual Updates. The evaluation shall include all necessary supporting documentation, including hydraulic model runs if appropriate.

b) Green Stormwater Infrastructure (GSI)

GSI project implementation shall be planned to capture, reduce, or otherwise control wet weather flows that would otherwise flow into the sewer system and contribute to CSOs.

DWSD has invested over \$50 million dollars in GSI projects in the Detroit collection system from 2009 to the present. The requirement for expending an average of \$3 million dollars per fiscal year for the ten-year period ending 2019 (for a total of \$30 million), and an average of \$2 million dollars per year for the following 10 years (for a total of \$20 million) on GSI projects has been achieved ahead of the required timeframe.

The GSI program shall meet the following requirements:

- The permittees shall complete any GSI projects currently being constructed.
- The permittees shall maintain the GSI projects constructed under the NPDES permit to ensure the continued performance of GSI projects.
- The permittees shall identify opportunities to implement new GSI projects that align with the Wastewater Master Plan and/or the approved LTCP for the Detroit collection system and consider construction of GSI projects that are determined to be cost effective and as funding allows.

The permittees shall provide an annual report on or before **October 1 of each year** that identifies the progress and current status of the above three requirements, including any new projects being proposed for design or construction within the next fiscal year.

c) Stormwater Control

- In November of 2018, the permittees created and enacted the Post Construction Stormwater Ordinance for the City of Detroit. DWSD developed and published the Stormwater Management Design Manual in conjunction with the ordinance being enacted. This ordinance applies to all areas of the City of Detroit.
- Stormwater runoff from new development and redevelopment that will be conveyed through storm sewers to DWSD's combined sewers will require control to help further reduce volume and frequency of untreated CSO discharges. These are projects that will require construction plan review by the permittees, and a Part 41 construction permit issued by the Department. Please note that in most cases, new combined sewers will no longer be permitted under Part 41 (except for combined sewer relocation projects). Note that this is not a requirement for storm sewers subject to Permit No. MIS040000 issued to the City of Detroit, as the storm sewers under MIS040000 discharge directly to surface waters and are not owned by the DWSD.
- Projects that seek to control, minimize or eliminate CSOs by reducing the wet weather flow to or from the combined sewer system (including any projects employing GSI) are undertaken expressly to comply with the requirements of Part I.A.16.f of this permit. These projects are deemed core elements of the permittees' CSO control program given their ultimate purpose and intent in reducing CSOs and improving the functionality of the combined sewer system. As part of their operational obligations under this permit, the permittees shall, for any newly identified or constructed permittee-owned or -operated separated outfall or point of discharge utilized by such projects, obtain an MS4 permit, or otherwise seek authorization from the Department under the provisions of an existing MS4 permit, to discharge stormwater to a surface water of the state. As part of seeking authorization from the Department under an MS4 permit, the permittees shall certify that the discharge from the newly identified or constructed permittee-owned or -operated separated outfall or point of discharge has been treated to meet the Water Quality Performance Standard identified in the Permittees' Post-Construction Stormwater Ordinance.

d) City Sewer Rehabilitation

DWSD shall continue work on an annual program to remove infiltration/inflow (I/I) from its combined collection system.

Long Term Control Plan and Combined Sewer Overflow Control Program Schedules

1) Phase I CSO Control Plan

The permittees submitted a Phase I CSO Control Plan (Phase I LTCP) on October 15, 2023 (conditionally approved July 17, 2024). The recommended Phase I LTCP focuses on water quality improvements to the Rouge River, with a future Phase II submission that controls the remaining non-core outfalls expected in the next reissued permit. As described in the Phase I LTCP, the permittees shall implement construction of in-line storage facilities at CSO Outfalls 064 (B065) and 074 (B080 and B081) in accordance with the following schedule:

- a) On or before **January 1, 2029**, the permittees shall submit to the Department for review and approval a basis of design report for the proposed projects.
- b) On or before **January 1, 2030**, the permittees shall submit to the Department for review and approval complete plans and specifications for the proposed projects.
- c) On or before **March 1, 2031**, the permittees shall commence construction of the proposed projects consistent with the approved plan and specifications.

2) Phase I CSO Control Plan Project Performance Certification Program

The permittees shall conduct a Project Performance Certification (PPC) Program to certify that CSO discharges from Outfalls 064 (B065) and 074 (B080 and B081) were corrected in accordance with the approved Basis of Design criteria, constructed consistent with the approved plans and specifications, and meet the CSO volume reduction goals specified in the conditionally approved Phase I LTCP. The PPC Program shall be completed in accordance with the following schedule:

- a) At least **90 days prior to** completion of construction of the proposed projects, the permittees shall submit to the Department for review and approval a PPC Work Plan for conducting the PPC Program.
- b) **Within 60 days** of completion of construction of the proposed projects or approval of the PPC Work Plan, whichever occurs last, and in accordance with the approved PPC Work Plan, the permittees shall implement the PPC Program.
- c) **Within one (1) year** of implementing the PPC Program, the permittees shall submit to the Department for review a PPC Evaluation Report. The PPC Evaluation Report shall demonstrate that the CSO outfalls listed above were corrected in accordance with the approved Basis of Design criteria, constructed consistent with the approved plans and specifications, and meet the CSO volume reduction goals specified in the conditionally approved Phase I LTCP.

If the permittees are unable to certify the projects meet the performance requirements as identified in the approved PPC Work Plan, then the permittees shall identify the corrective actions necessary to bring the projects into compliance as part of the Phase II CSO Control Plan required in Part I.A.18.g.3) of this permit.

3) Phase II CSO Control Plan

On or before **January 1, 2032**, a Phase II CSO Control Plan (Phase II LTCP) shall be submitted to the Department for review and approval. The Phase II LTCP shall focus on the requirements for both water quality protection and immediate public health protection from basement backups; consider any analyses performed for the regional collection systems or local City of Detroit collection system, or watershed study through the United States Army Corps of Engineers (USACE) regional flood mitigation study; and be expected to meet the required CSO outfall corrections as identified above. Any request for modification of the approved Phase II LTCP shall be submitted in writing to the Department for review and approval via MiEnviro Portal. Modification requests shall explain the nature of the modification, provide adequate rationale for the modification, and include all necessary supporting documentation to enable a full review of the proposed modification. Upon written approval from the Department, the modification shall become an enforceable requirement under this permit.

4) Pilot Netting and Disinfection Facilities

The permittees have initiated planning for the feasibility and design of a pilot study of Netting and Disinfection Facilities (NDFs) to provide correction through treatment for Outfall 005 (B03 McClellan), Outfall 006 (B04 Fischer), and Outfall 007 (B05 Iroquois). If constructed, these NDFs shall be designated Outfall 110, Outfall 111, and Outfall 112, respectively, and are required to meet the discharge limits identified in Part I.A.6.

On or before **June 30, 2027**, the permittees shall submit to the Department for review and approval a feasibility study report. The report shall identify whether construction of the NDFs would meet the required discharge limits and CSO correction requirements while considering the technical, financial, and operational constraints for each outfall targeted above. If construction of the NDFs is determined to be infeasible, the report shall include a supporting evaluation and data. If construction of the NDFs is determined to be feasible, the report shall include a proposed schedule for design and construction of the NDFs for each identified outfall.

5) West Chicago South CWSRF project

The Clean Water State Revolving Fund (CWSRF) project number 5980-01 for the West Chicago South project plans and specifications were approved effective May 24, 2024. The permittees shall complete construction of the permitted project and notify the Department **within 30 days** of achieving substantial completeness.

Following implementation of any phase of any approved Control Programs contained in Part I.A.18.f. and g. of this permit or following completion of analyses performed for the local or regional collection systems, the Control Program(s) may be reevaluated by the permittees or the Department. Future permits may include requirements to conduct water quality evaluations designed to verify that the overall CSO control program provides adequate treatment to meet water quality standards. This permit may be modified in accordance with applicable laws and rules, to incorporate revisions necessary to conform to pertinent rules or laws, or as necessary to address prevailing situations, such as technical or financial constraints.

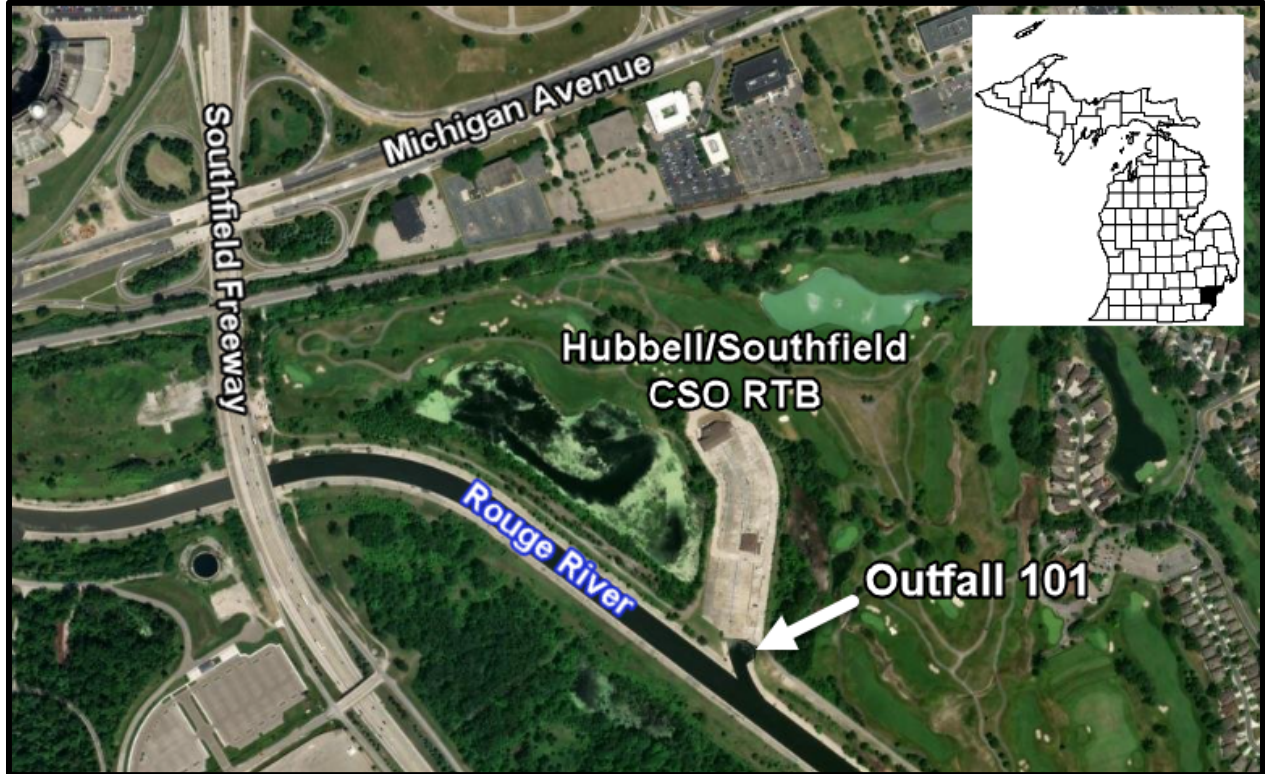
MAPS OF DISCHARGE LOCATIONS

GLWA WRRF Coordinates: Latitude 42.2847, Longitude -83.1287

Map 1: Great Lakes Water Authority Water Resource Recovery Facility Outfalls



Map 2: Hubbell/Southfield CSO RTB



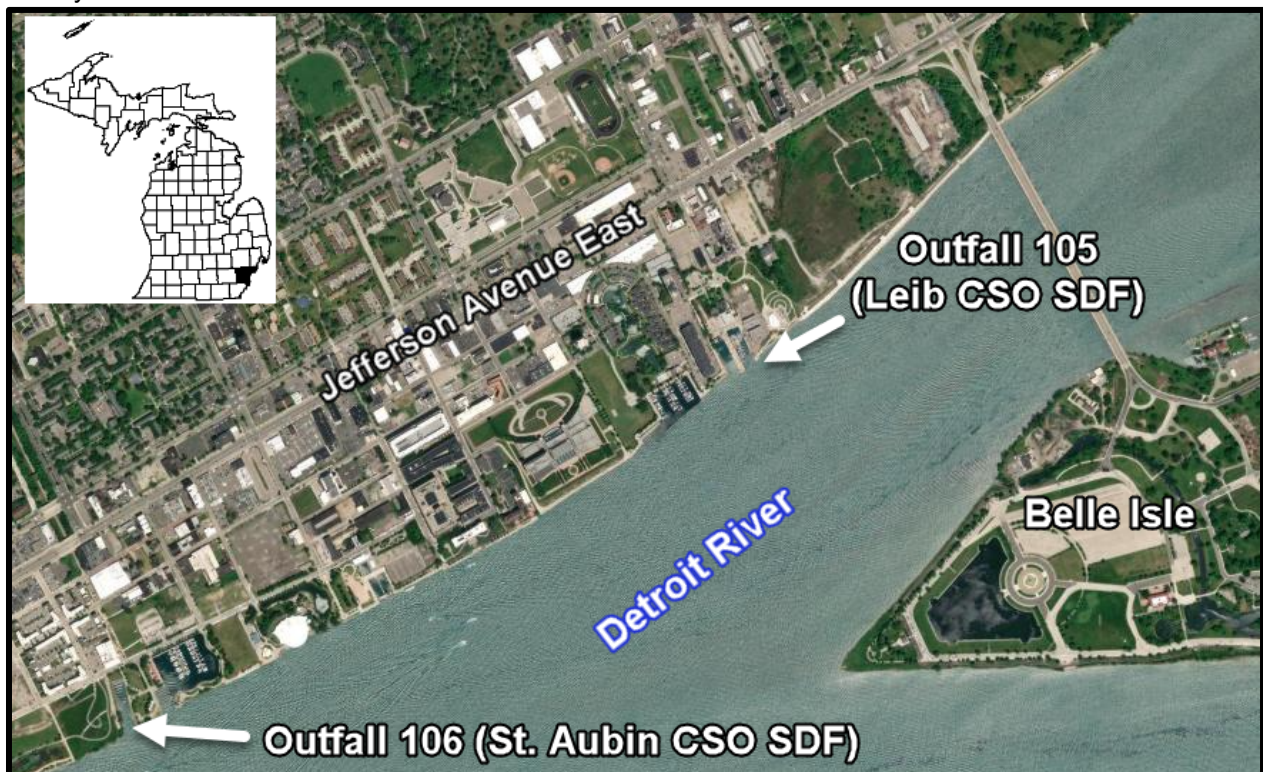
Map 3: Seven Mile CSO RTB



Map 4: Puritan/Fenkell CSO RTB



Map 5: Leib CSO Screening and Disinfection Facility and St. Aubin CSO Screening and Disinfection Facility



Map 6: Belle Isle RTB and Conner Creek CSO RTB



Map 7: Oakwood RTB and Baby Creek CSO Screening and Disinfection Facility



RECEIVING WATER

The Detroit River is protected for agricultural uses, navigation, industrial water supply, public water supply in areas with designated public water supply intakes, cold-water fish, other indigenous aquatic life and wildlife, partial body contact recreation, total body contact recreation (May through October), and fish consumption.

The Rouge River (including the Old Channel) is protected for agricultural uses, navigation, industrial water supply, public water supply in areas with designated public water supply intakes, warm-water fish, other indigenous aquatic life and wildlife, partial body contact recreation, total body contact recreation (May through October), and fish consumption.

Conner Creek is protected for agricultural uses, navigation, industrial water supply, public water supply in areas with designated public water supply intakes, warm-water fish, other indigenous aquatic life and wildlife, partial body contact recreation, total body contact recreation (May through October), and fish consumption.

For the outfalls discharging to the Detroit River, the receiving stream flows used to develop effluent limitations are a 95 percent exceedance flow of 65,000 cfs, a harmonic mean flow of 104,500 cfs, and a 90-day, 10-year low flow of 92,500 cfs.

For the outfalls discharging to the Rouge River, the receiving stream flows used to develop effluent limitations are a combination of the natural flow of the Rouge River and the authorized flow for facilities upstream including the Ford Rouge River Complex (Cleveland Cliff Steel Corporation – Dearborn Works (MI0043524); Ford Rouge Mfg Complex (MI0059218); St. Mary's Cement Co (MI0004243); and Carmeuse Lime-River Rouge (MI0057126)). Double Eagle Steel Coating Co has been moved from an individual NPDES permit to coverage under an industrial stormwater general permit to discharge an unspecified amount of stormwater and therefore was not included. In addition to the removal of Double Eagle Steel Coating flow, through conversations with upstream permittees, it was determined flow from the Dearborn Ind Generation Plt facility (MI0056235) flows through outfalls accounted for in the Cleveland Cliffs Steel Corporation – Dearborn Works facility (Monitoring Point 004B/Outfall 004 and Monitoring Point 006A/Outfall 006). The natural low flow in the Rouge River upstream of the GLWA WRRF has 95% exceedance, harmonic mean, and 90dQ10 low flows of 16, 93, and 34 cfs, respectively (Low Flow File No. 10574 – Wayne County). With the addition of all facility outfalls to the Rouge River (listed in the table below), the 95 percent exceedance, harmonic mean, and 90dQ10 low flows are 1,081.5 cfs, 1,158.5 cfs, and 1,099.5 cfs, respectively.

Facility	Authorized Flow (cfs)
Ford Rouge River Complex (MI0043524 and MI0059218)	1060.52
St. Mary's Cement Co - Detroit (Outfall 001)	4.18
St. Mary's Cement Co - Detroit (Outfall 002)	0.11
Carmeuse Lime-Rouge River	0.73

MIXING ZONE

For toxic pollutants, the volume of the Detroit River used to ensure that effluent limitations are sufficiently stringent to meet WQS is not more than 12.5 percent of the receiving water design flow for lotic systems, in accordance with R 323.1090(2).

For toxic pollutants, the volume of the Rouge River used to ensure that effluent limitations are sufficiently stringent to meet WQS is not more than 25 percent of the receiving water design flow for lotic systems, in accordance with R 323.1090(2).

For other pollutants, the volume of the receiving stream used in assuring that effluent limitations are sufficiently stringent to meet WQS is the applicable design flows of the receiving stream. Specifically, the effluent limitations for carbonaceous biochemical oxygen demand (CBOD5), ammonia nitrogen (as N), and dissolved oxygen (DO) for discharge through Outfall 049 will not cause in-stream DO levels to be below the applicable DO standard in the Detroit River under critical conditions. Similarly, CBOD5, Ammonia Nitrogen, and DO effluent limitations in the permit for discharge through Outfall 050 will not violate the in-stream DO standard in the Rouge River at times of discharge.

The permit approves discharges from the facility's primary treated effluent conduit through Outfall 049 to the Detroit River and Outfall 050 to the Rouge River during or following wet weather events when the hydraulic capacities of the secondary treatment facilities are exceeded (i.e., greater than 930 MGD). Because these flows result significantly from combined sewer systems, the authorized discharges are addressed according to the regulatory approach taken for CSO discharges. These intermittent discharges are evaluated to ensure that they meet WQS at times of discharge. This is consistent with state and federal regulations and policies regarding authorizations from combined sewer systems.

EXISTING EFFLUENT QUALITY – MONITORING POINT 049F: (from DMR data from March 1, 2021 to February 28, 2026)

Parameter	Minimum Daily	Maximum Monthly Average	Maximum 7-Day Average	Maximum Daily	Units
Flow	---	673	---	850	MGD
Fecal Coliform Bacteria	---	125	269	2,420	cts/ 100 ml
Total Residual Chlorine (TRC)	---	---	---	0.32	mg/l
Oil & Grease	---	---	13	49	mg/l
Polychlorinated Biphenyl (PCB) Aroclor	---	---	---	<0.1	ug/l
Acute Toxicity	---	---	---	<0.2	TU _A
Carbonaceous Biochemical Oxygen Demand (CBOD5)	---	---	---	>38	mg/l
Ammonia Nitrogen (as N)	---	19	---	23	mg/l
Available Cyanide	---	---	---	12	ug/l
Perfluorooctanesulfonic Acid (PFOS)	---	---	---	53	ng/l
Perfluorooctanoic acid (PFOA)	---	---	---	0.012	ug/l
Total Copper	---	---	---	59	ug/l
pH	6.2	---	---	7.9	S.U.
Dissolved Oxygen	1.8	---	---	---	mg/l

EXISTING EFFLUENT QUALITY – MONITORING POINT 049A: (from DMR data from March 1, 2021 to February 28, 2026)

Parameter	Minimum Daily	Maximum Monthly Average	Maximum 7-Day Average	Maximum Daily	Units
Flow	---	117	---	704	MGD
Carbonaceous Biochemical Oxygen Demand (CBOD5)	---	44	---	67	mg/l
Total Suspended Solids (TSS)	---	75	---	105	mg/l
Total Phosphorus (as P)	---	2.8	---	6.8	mg/l
Ammonia Nitrogen (as N)	---	8.4	---	12	mg/l
Total Mercury (12-Month Rolling Average)	---	5	---	---	ng/l

EXISTING EFFLUENT QUALITY – MONITORING POINT 049B: (from DMR data from March 1, 2021 to February 28, 2026)

Parameter	Minimum Daily	Maximum Monthly Average	Maximum 7-Day Average	Maximum Daily	Units
Flow (all secondary flow minus recycle and buffer flows)	---	699	---	931	MGD
Recycled Flow (screened final effluent)	---	37.4	---	38.5	MGD
Buffer Flow	---	128	---	215	MGD
Carbonaceous Biochemical Oxygen Demand (CBOD5)	---	8	12	23	mg/l
Total Suspended Solids (TSS)	---	10	24	71	mg/l
Ammonia Nitrogen (as N)	---	19	---	24	mg/l
Total Mercury (12-Month Rolling Average)	---	1.6	---	---	ng/l
pH	6.6	---	---	8	S.U.
Total Phosphorus (as P)					
All Year	---	0.7	---	3	mg/l
April – September Six-Month Average	---	0.5	---	---	mg/l
			Minimum Monthly		
CBOD5 Minimum Percent Removal	39	---	92	---	%
TSS Minimum Percent Removal	35	---	92	---	%

EXISTING EFFLUENT QUALITY – MONITORING POINT 050A: (from DMR data from March 1, 2021 to February 28, 2026)

Parameter	Minimum Daily	Maximum Monthly Average	Maximum 7-Day Average	Maximum Daily	Units
Flow	---	342	---	927	MGD
Available Cyanide	---	---	---	32.3	ug/l
Total Copper	---	---	---	71	ug/l
Fecal Coliform Bacteria	---	90	321	477	cts/ 100 ml
Oil & Grease	---	---	13	13	mg/l
Polychlorinated Biphenyl (PCB) Aroclor	---	---	---	<0.1	ug/l
pH	6.5	---	---	7.6	S.U.
Dissolved Oxygen	4	---	---	---	mg/l

PROPOSED EFFLUENT LIMITATIONS: (see draft permit)

BASIS FOR PROPOSED EFFLUENT LIMITATIONS: (see Basis for Decision Memo)

REGISTER OF INTERESTED PERSONS

Any person interested in receiving notification by e-mail of National Pollutant Discharge Elimination System (NPDES) or state surface water discharge permitting actions may register with the Permits Section of the Department of Environment, Great Lakes, and Energy (Department). To register, e-mail the contact identified below with your full name and the request that you be added to the Department's Public Notice Notification List. Once you are added to the list, you will receive an e-mail notification for every public-noticed NPDES or state surface water discharge permitting action in the state (or only those for which you have expressed a specific interest) unless/until you ask to be removed from the list.

PUBLIC COMMENT

Persons wishing to submit comments or request a public hearing should do so through MiEnviro Portal. Go to <https://mienviro.michigan.gov/ncore/>, select 'Public Notice Search,' search for this public notice by entering the permit number into the search field, click 'Search', click 'View,' click 'Add Comment,' enter information into the fields, and then click 'Submit.' Comments or objections to the draft permit received by **September 10, 2026**, will be considered in the final decision to issue the permit, as will comments made at a public hearing should one be held by the Department on the draft permit.

A hybrid in-person and virtual public meeting and hearing with the Department will be held to seek public input on the proposed reissuance of the permit. During the public meeting, the Department will briefly explain the proposed permit and answer questions. Following the public meeting, the public will have an opportunity to provide comments on the proposed permit during the public hearing. The public meeting and hearing will be held on **September 3, 2026 at 5:30 p.m.**, at the Kemeny Recreation Center located at 2260 South Fort Street, Detroit, MI 48217. To attend the event online, register at <https://bit.ly/WRD09032026>. After registering, you will receive a confirmation email containing information about joining the meeting. If you do not have internet access and would like to join by PHONE ONLY please use the following phone number: 855-758-1310 and use meeting ID 875 2592 2116#. Pre-registration is not required to attend. Individuals interested in participating can click the link above at the start of the event (5:30 p.m.).

Individuals needing language assistance or accommodations for effective participation at the meeting or hearing should contact Joel Roseberry at RoseberryJ@michigan.gov or 517-599-9494 by August 20, 2026 to request language, mobility, visual, hearing, translation, and/or other assistance.

Inquiries should be directed to Tom Braum, Permits Section, Water Resources Division, Department of Environment, Great Lakes, and Energy, P.O. Box 30458, Lansing, Michigan 48909-7958; telephone: 517-331-7377; or e-mail: BraumT2@Michigan.gov.