



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](mailto: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