



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



C. HEIDI GREYER
DIRECTOR

August 14, 2017

Mr. Majid Khan
Director – Wastewater Operations
Great Lakes Water Authority
9300 West Jefferson Avenue, Suite 103
Detroit, Michigan 48209
SRN: N7584, N7704, N7879, Wayne County

Dear Mr. Khan:

VIOLATION NOTICE

On August 2, 2017, the Department of Environmental Quality, Air Quality Division (DEQ-AQD) conducted inspections of facilities that are operated by the Great Lakes Water Authority (GLWA). Specifically, DEQ-AQD staff visited the Baby Creek Screening and Disinfection Facility, located at 9543 Dix Road in Dearborn (SRN N7584); the Oakwood Combined Sewer Overflow (CSO) Retention Treatment Basin (RTB), located at 12082 Pleasant Street in Detroit (SRN N7704); and the Belle Isle CSO RTB, located at 2 Pleasure Drive at Belle Isle State Park in Detroit (N7879). The purpose of these inspections was to determine GLWA's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the terms and conditions of Permits to Install (PTI) that have been issued to these facilities.

During the inspections, DEQ-AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Odor control system at the Baby Creek Screening and Disinfection Facility (N7584), designated as EU-OCS in the facility's PTI.	PTI No. 69-06, Special Conditions (SCs) 1.5, 1.7 and 1.8.; R 336.1910	The odor control system at this facility is not equipped with a device to monitor the air flow through the carbon reactor system.
Odor control systems at the Oakwood CSO RTB (N7704). These systems are designated as EU-OCS-PUMP, EU-OCS-SCR/CSO1 and EU-OCS-SCR/CSO2 in the facility's PTI.	PTI No. 291-06, SCs 1.5, 1.6, 2.5 and 2.6; R 336.1910	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.

Odor control system at the Belle Isle CSO RTB (N7879), designated as EU-RETBASIN in the facility's PTI.	PTI No. 333-07. SCs 1.5 and 1.6; R 336.1910	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.
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PTI No. 69-06 requires that the odor control system at the Baby Creek facility (N7584) be equipped with a device to determine the air flow through the carbon reactor system (SC 1.5). GLWA is further required to calibrate, maintain and operate, in a satisfactory manner, devices to monitor, on a continuous basis, the air flow through the carbon reactor system (SC 1.7), and to keep records of the air flow through the carbon reactor system on a weekly basis (SC 1.8). PTI No. 291-06 requires GLWA to test, in a satisfactory manner, the activated carbon beds associated with the odor control equipment at the Oakwood CSO RTB facility (N7704) for breakthrough at least once per calendar quarter (SCs 1.5 and 2.5), and to keep records of each activated carbon bed breakthrough test (SCs 1.6 and 2.6). PTI No. 333-07 requires GLWA to test, in a satisfactory manner, the activated carbon bed associated with the odor control equipment at the Belle Isle CSO RTB facility (N7879) for breakthrough at least once per calendar quarter (SC 1.5), and to keep records of each activated carbon bed breakthrough test (SC 1.6). GLWA is not complying with these requirements.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 5, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates that the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If GLWA believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Mr. Majid Khan
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspections of the GLWA facilities. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Stephen Weis
Senior Environmental Engineer
Air Quality Division
313-456-4688

cc: Mr. Raymond Scott, City of Detroit BSEED
Ms. LaReina Wheeler, City of Detroit BSEED
cc/via e-mail: 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