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GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 30, 2019

Second Violation Notice No. SVN-00876

CERTIFIED MAIL

Mr. Steve Wyzgoski, WWTP Superintendent
Saline Wastewater Treatment Plant
100 North Harris Street
Saline, Michigan 48176

Dear Mr. Wyzgoski:

SUBJECT: Second Violation Notice

The Department of Environment, Great Lakes, and Energy (EGLE), Water Resources Division (WRD), issued a Violation Notice (VN-009385) to the Saline Wastewater Treatment Plant (WWTP) on March 19, 2019, in response to violations of Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.3101 et seq., and the administrative rules promulgated thereunder being 2006 AACR 323.2101 et seq., as amended; National Pollutant Discharge Elimination System (NPDES) Permit No. MI0024023. The Saline WWTP has not provided an adequate response to the Violation Notice and new violations have occurred since the issuance of VN-009385.

On April 23, 2019, Saline WWTP responded to the Violation Notice and provided preliminary follow up to requested items but did not provide an adequate response to specific items requested. The following sections detail what was submitted and why it does not fulfil the Violation Notice requests. WRD completed a follow up site inspection on September 12, 2019 and noted ongoing and new issues at the WWTP. The findings are also listed below.

Odor Abatement

WRD completed a site inspection on September 12, 2019, which was prompted by recent odor complaints and effluent limit violations. During the site inspection, the odor abatement project was observed, including the newly installed bioscrubber and carbon absorption unit. Hydrogen sulfide samples were also collected at the WWTP and the surrounding neighborhoods. Initial sampling appears that odor treatment units are operating as designed. All treatment units, except for the secondary clarifiers, are treated for odor and/or are maintained inside buildings.

Solids Inventory

During the September 12, 2019 inspection, WRD staff observed sludge blankets at levels of concern in the primary and secondary clarifiers. Secondary clarifiers had sludge blankets at three (3) and four (4) feet, although the days pre- and post-inspection secondary sludge levels were around seven (7) feet. Primary clarifiers were not appearing to settle out well and a defined sludge blanket was difficult to determine. Excessive solids inventory in settling tanks is

known to result in poor unit process performance and generate excessive odors. The industry standard for sludge depths is one (1) to two (2) feet in both the primary and secondary clarifiers. These targets allow for optimal compaction of sludge for pumping to downstream processes and maximizes unit process performance.

Operational changes to solids inventory were recommended in response to the site visit. Operators began to waste from the secondary clarifiers directly to the digester to reduce the solids inventory. As stated via phone and email conversations, sludge depths shall be taken and recorded at least every other day to ensure that solids inventory is appropriately managed. Operational changes shall be implemented to meet these targets if solids are outside of the targeted range.

Outstanding VN-009385 Response Items

Rotating Biological Contactors (RBCs)

Saline WWTP stated "The RBC units have been problematic, and I have obtained the name of the Walker representative that may be able to provide some insight. I will contact him in May of 2019 and after consultation obtain some bids for repair of the units. I currently have \$35,000 in this year's budget and \$35,000 in next year's budget which begins in July 2019." This response is inadequate because it did not provide a routine schedule for repair and maintenance on the RBCs. During the site inspection on September 12, 2019, seven (7) of the eighteen (18) RBCs were not operational due to electrical and mechanical issues. Saline WWTP staff stated that a change order has been requested for the SRF loan for the odor abatement project to include repairs of the RBCs. Please provide a schedule and timeline (including specific dates) for repair and/replacement of the RBCs.

Disc Filters

Saline WWTP stated "The Nova Filters have been problematic since installation in 2016. We presently have one Nova Filter in operation, and we are waiting on a proximity sensor for the other unit. Training has been provided to staff but due to the problems we have experienced the Warranty Period has not started yet. We perform small maintenance items but contact the manufacturer for larger issues so as not to void the warranty. They have been responsive but are still working on getting things right." Additional updates were provided via email correspondence on May 8, 2019 and June 20, 2019, in addition to phone conversations on the topic. This response is inadequate because it did not provide a timeline for repair and training in operation for the Disc Filters to be fully operational. During the site inspection on September 12, 2019, one (1) disc filter was not in service due to operational issues. WWTP staff stated that the manufacturer has been out working on the filters various times and one (1) disc filter has been operational for a period of time. Please provide a timeline (including specific dates) for repair and training in operation of the disc filters.

Laboratory QA/QC

Saline WWTP stated "I am reviewing our current procedures and agree that we need to develop a more robust QA/QC Program to ensure confidence of our analytical results. I am purchasing a Hach DR 3900 Spectrophotometer which will aid in accuracy of many of the parameters we analyze. Current methods are under review and new methods will be evaluated when the instrument is obtained. I plan on having a proper QA/QC Manual and procedures in place no later than June 30, 2019 which will include accuracy and precision charting. I will submit the Manual for your review and approval and provide training to all pertinent Staff." Additionally,

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WRD staff were notified that discussions have been had with other WWTP laboratories and what their QA/QC Programs consist of. This response is inadequate because a QA/QC Program has not been implemented and WRD staff are not aware that the Spectrophotometer has been purchased. Please provide a timeline (including specific dates) for implementation of the QA/QC Program at the Saline WWTP.

The violation(s) identified in the Violation Notice are continuing. The following violations have been identified since the Violation Notice was issued.

Discharge Monitoring Reports

Saline WWTP has reported the following parameters through the Discharge Monitoring Reports (DMRs). These effluent limit violations have occurred from March 2019 until the issuance date of this letter. These monitoring results are violations of your permit.

Date	Parameter	Effluent Limitation		Reported Values	
		Daily Maximum	Monthly Average	Daily Maximum	Monthly Average
04/01/2019	Sulfate	(report)		*H	
	Available Cyanide	(report)		*H	
	Chloride	(report)		*H	
05/01/2019	Ammonia		0.5 mg/L		0.77 mg/L
			7.5 lbs/day		12.4 lbs/day
	Ammonia [7-day avg]		30 lbs/day		61 lbs/day
	CBOD5		4.0 mg/L		4.1 mg/L
05/02/2019	Ammonia [7-day avg]		60 lbs/day		63 lbs/day
06/01/2019	Ammonia		30 lbs/day		34 lbs/day
06/10/2019	Ammonia		0.5 mg/L		0.91 mg/L
07/01/2019	Ammonia		7.5 lbs/day		12.9 lbs/day
07/04/2019	Ammonia		30 lbs/day		31 lbs/day
07/07/2019	Ammonia		0.5 mg/L		1.22 mg/L
07/12/2019	Ammonia		7.5 mg/L		12.9 lbs/day
07/13/2019	Ammonia	2.0 mg/L		2.31 mg/L	
07/14/2019	Ammonia			2.13 mg/L	
07/15/2019	Ammonia				457 cts/100 mLs
07/18/2019	Fecal Coliform [7-day geometric mean]		400 cts/100 mLs		403 cts/100 mLs
07/30/2019	Fecal Coliform [7-day geometric mean]				551 cts/100 mLs
08/01/2019	Dissolved Oxygen	7.0 mg/L		6.5 mg/L	
08/04/2019	Dissolved Oxygen	2.0 mg/L		2.13 mg/L	
08/01/2019	Ammonia		0.5 mg/L		1.22 mg/L
08/01/2019	Ammonia		7.5 lbs/day		12.7 lbs/day
08/01/2019	CBOD5		4.0 mg/L		5.7 mg/L
08/04/2019	Ammonia	2.0 mg/L		2.31 mg/L	
08/04/2019	Dissolved Oxygen	7.0 mg/L		6.8 mg/L	

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08/05/2019	Dissolved Oxygen	7.0 mg/L	6.8 mg/L
08/07/2019	Ammonia	2.0 mg/L	2.13 mg/L
08/18/2019	Dissolved Oxygen	7.0 mg/L	6.8 mg/L
08/20/2019	CBOD5	10 mg/L	11.8 mg/L
08/22/2019			10.4 mg/L
08/25/2019			11.7 mg/L
08/29/2019	Dissolved Oxygen	7.0 mg/L	6.6 mg/L
08/30/2019	Ammonia	2.0 mg/L	2.13 mg/L
	Dissolved Oxygen	7.0 mg/L	6.8 mg/L

Comments in the DMRs state that various violations are due to issues with the RBCs and high flows. Various effluent limit violations were also discussed during the site inspection on September 12, 2019. Saline WWTP has failed to adequately notify the Department of noncompliance with the permit per Part II.C.6. of the NPDES Permit No. MI0024023. All instances of noncompliance with the NPDES permit shall be reported as follows:

a. 24-Hour Reporting

Any noncompliance which may endanger health or the environment (including maximum and/or minimum daily concentration discharge limitation exceedances) shall be reported, verbally, within 24 hours from the time the permittee becomes aware of the noncompliance. A written submission shall also be provided within five (5) days.

b. Other Reporting

The permittee shall report, in writing, all other instances of noncompliance not described in a. above at the time monitoring reports are submitted; ...

Written reporting shall include: 1) a description of the discharge and cause of noncompliance; and 2) the period of noncompliance, including exact dates and times, or, if not yet corrected, the anticipated time the noncompliance is expected to continue, and the steps taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

Please provide a written report including the above items for the violations listed in the table above.

Conclusion

Saline WWTP is in violation of the ND PES Permit No. MI0024023, Part 31, Water Resources Protection, of the NREPA, and the violations are ongoing. The City of Saline must take action to achieve and maintain compliance with the terms and conditions of the ND PES Permit No. MI0024023.

Saline WWTP is required to submit a written response to this letter no later than **October 30, 2019**. At a minimum, the response shall include the following action items:

1. Confirmation that sludge depths in the clarifiers will be measured and recorded at least every other day to ensure that solids inventory is appropriately managed. Please confirm that a record will be kept on site and available for review by WRD staff, if requested.

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2. Please provide a schedule and timeline (including specific dates) for repair and/or replacement of the RBCs.
3. Please provide a timeline (including specific dates) for repair and training in operation of the disc filter.
4. Please provide a timeline (including specific dates) for implementation of the QA/QC Program.
5. Please provide a written report of the noncompliance effluent limit violations listed in the table above.


Saline WWTP shall take immediate action to achieve and maintain compliance with the terms and conditions of NPDES Permit No. MI0024023.

If you have any factual information you would like to share with us regarding the violations identified in this Violation Notice, please provide them with your written response.

The WRD reserves its right to take all necessary and appropriate enforcement actions for all violations observed to date and any violations that occur in the future. This may include civil action seeking fines, enforcement costs, injunctive relief, and potential criminal prosecution.

We anticipate and appreciate your cooperation in resolving this matter. Should you require further information regarding this Violation Notice or if you would like to arrange a meeting to discuss it, please contact Ms. Claire Dijak at 517-281-8355; by email at DijakC@Michigan.gov; or via mail at EGLE, WRD, Jackson District Office, 301 East Louis Glick Highway, Jackson, Michigan 49201-1535.

Sincerely,


Tiffany J. Myers
Jackson District Supervisor
Water Resources Division
517-243-4915

cc: Ms. Claire Dijak, EGLE
Mr. Byron Lane, EGLE