

STATE OF MICHIGAN



JOHN ENGLER, Governor  
**DEPARTMENT OF ENVIRONMENT QUALITY**  
*"Better Service for a Better Environment"*

REPLY TO:  
SE MICHIGAN DISTRICT OFFICE  
38980 SEVEN MILE RD  
LIVONIA, MI 48152-1006

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973  
INTERNET: [www.deq.state.mi.us](http://www.deq.state.mi.us)  
RUSSELL J. HARDING, Director

AUGUST 7, 2000

Mr. Vyto Kaunelis, Chief Deputy Director  
Wayne County Department of Environment  
415 Clifford  
Detroit, Michigan 48226

**Re: Phase II Review – Inkster Retention Treatment Basin (RTB) MI0051471  
Dearborn Heights RTB MI0051489**

Dear Mr. Kaunelis:

We have completed our review of the CSO Basin Evaluation Reports (Interim Final) for the above two facilities. These reports were submitted on March 15, 2000, in response to NPDES requirements for each of the facilities.

### **Phase II Review**

The event sampling data for both basins were evaluated against the phase II requirements presented in the "Criteria for Success in CSO Treatment" document, dated August 10, 1998. We agree that the data demonstrate that these facilities are capable of; 1) protecting public health, and 2) eliminating raw sewage, across the range of storms monitored, when operated correctly. However; the data also show that in order to effectively meet the fecal coliform requirements, Total Residual Chlorine (TRC) needs to be above the 1 mg/1 goal in the NPDES permits (in the range of 1 – 1.5 mg/1), and the facilities need to be properly operated. Please note that the water quality effects of higher TRC, as well as other pollutants, will continue to be evaluated as part of the Phase III review.

### **Necessary Future Actions**

As part of this phase II approval, the permittees, or agencies that operate these CSO facilities, must complete the following necessary actions.

- Properly operate the RTBs to meet fecal coliform requirements (e.g. monitor NaOCI concentrations in storage monthly to ensure adequate strength for disinfection).
- Participate fully in the evaluation of goal 1 from the Criteria of Success in CSO Treatment document.
- Participate fully in the CSO Workgroup, as other NPDES requirements such as review of basin features across the demonstration, are discussed and evaluated.
- Participated fully in the phase III water quality evaluation.
- Complete the analysis which are currently pending in the "Interim Final" report.

## Other Comments

- Please investigate if the use of wet well dewatering during events has the potential of contributing to any downstream SSOs in the NHV/RV District, and communicate the results to our office.
- For Inkster, limitations, monitoring, and reporting requirements, as specified in Part I.A.6.a. through d. of NPDES permit MI0051471 continue to be in effect (see November 11, 1999 letter from Phil Argiroff to Bill Shaffer).
- Trash net monitoring may cease.
- As discussed in previous CSO Workgroup meetings, it will be determined at CSO Workgroup meetings when the special study at Inkster, and evaluation event monitoring at Dearborn Heights with LS IA operational, may cease. Please note that for Dearborn Heights, the data are sufficient to determine that phase 11 has been met, but additional evaluation data are still being collected now that LS IA is operational.
- Any NPDES permit requirements that require additional work for these above facilities to meet phase 11 requirements, are now not necessary. This is due to our agreement that the current RTBs can comply with phase 11 requirements when properly operated.
- We do not necessarily agree with all assured assumptions and interpretations made in the report section which compares basin performance to the EPA CSO presumption criteria. One concern is the interpretation of how MDEQ CSO policy establishes the detention time for "primary treatment".

Finally, we wish to thank Wayne County staff, and Wade-Trim staff, for their cooperation during this phase of the CSO program review. We believe that the cooperative effort has helped produce a better evaluation, and are confident that it will continue as phase III evaluation progresses. If you have any questions about this letter, please contact Phil Argiroff at (734) 953-1443.

Sincerely,



Roy Schrameck, District Supervisor  
Surface Water Quality Division



by: Phil Argiroff, P.E.  
Environmental Engineer

cc: Dr. Jonathan Bulkley, Federal Court  
Mr. Robert Gordon, City of Inkster  
Hon. Ruth Canfield, Mayor, City of Dearborn Heights  
Mr. William Shaffer, Wayne County DPW  
Mr. Bill McCracken, MDEQ  
Mr. Paul Blakeslee, MDEQ  
Mr. Roy Schrameck, MDEQ  
Mr. Tom Kneuve, MDEQ  
Mr. Osama Khaimi, MDEQ  
Mr. Doug Early, MDEQ  
Mr. Tony Igwe, Wade-Trim  
Mr. Clayton McCormack, Wade-Trim  
Ms. Carol Hufnagel, RPO  
Mr. Ed Kluitenberg, RPO