

STATE OF MICHIGAN



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENT QUALITY
"Better Service for a Better Environment"
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RUSSELL J. HARDING, Director

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

June 9, 2000

Mr. Douglas Buchholz, P.E.
Deputy & Manager of Operations and Maintenance
Oakland County Drain Commissioner
Building 95 West
One Public Works Drive
Waterford, MI 48328-1907

Re: Phase II Review – Acacia Park CSO Retention Treatment Basin (RTB), MI0037427
Birmingham CSO RTB, MI0025534
Bloomfield Village CSO RTB, MI0048046

Dear Mr. Buchholz:

We have completed our review of the Retention Basin Evaluation Reports for the above three CSO Retention Treatment Basins (RTB). These reports were submitted on March 15, 2000, in response to NPDES permit requirements for each of the facilities.

Phase II Review

The event sampling data for all three 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/l goal in the NPDES permits (in the range of 1 – 1.5 mg/l), 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 NaOCl concentrations in storage monthly to ensure adequate strength for disinfection).
- Update influent flow hydrographs for the three CSO RTBs in response to the various rain events.
- 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.
- Review any change to peak flows to each RTB, based on rain events, as tributary collection system relief projects are completed, to ensure long-term compliance with phase II requirements. The current data indicate that peak flows are lower than predicted partially due to upstream collection system restrictions. As restrictions are corrected, peak flows should increase.

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Other Comments

- Please further investigate why peak dry weather flows to the Acacia Park and Bloomfield Village RTBs occasionally exceed the regulated capacities of the system, and communicate the results to our office.
- Please investigate if use of the Comprehensive RTB Dewatering Plan, has contributed to any downstream SSOs in the Evergreen-Farmington District, and communicate the results to our office.
- Limitations, monitoring, and reporting requirements, as specified in Part I.A.6.a. through e. of each NPDES permit, are now in effect.
- We should determine at our next CSO Workgroup meeting, at what point the special interim weir monitoring at Bloomfield Village, and the trash net monitoring at Acacia Park and Birmingham, should cease.
- It is not necessary that the permittees submit an approval project plan for additional CSO facilities to meet phase 11, as stated in Part I.A.2.d. of each NPDES permit, due to our agreement that the current RTBs can comply with phase 11 requirements when properly operated.

Finally, we wish to thank Oakland County Drain Commissioner staff, and HRC staff, for their cooperation during this phase of the CSO program review. We believe that the cooperative effort has helped produced 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. Bulkley, Federal Court
Phil Sanzica, OCDC
City of Birmingham
City of Bloomfield Hills
Bloomfield Township
Village of Beverly Hills
Bill McCracken, MDEQ
Paul Blakeslee, MDEQ
Roy Schrameck, MDEQ
Tom Knueve, MDEQ
Jack Patel, MDEQ
Sally Duffy, HRC
Ed Kluitenberg, RPO
Carol Hufnagel, R.PO

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 Redford, liminations, monitoring, and reporting requirements, as specified in Part 1.A.6.a. through d. of NPDES permit MI0051535 continue to be in effect (see January 19, 2000 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 of the swirl concentrator at Redford, may cease.
- Any NPDES permit requirements that require additional work for this facility to meet phase II requirements, are now not necessary. This is due to our agreement that the current RTB can comply with phase II 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 SCHRAMBECK, District Supervisor
Surface Water Quality Division

by:



cc: Dr. Jonathan Bulkley, Federal Court
Mr. Vyto Kaunelis, Wayne County DOE
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