



September 26, 2024

**RE: Great Lakes Water Authority (GLWA)  
2024 Updated Industrial Pretreatment Program (IPP) Rules &  
Invitation for Public Comment until November 11, 2024**

Dear Member Partner,

On September 25, 2024, the GLWA Board opened the public comment period concerning the **2024 Updates to the Industrial Pretreatment Rules**.

**Summary of 2024 Updates to the IPP Rules**

The primary updates involve updated State and Federal regulation of perfluoroalkyl and polyfluoroalkyl substances (“PFAS”). The IPP Rules have been updated to reflect these requirements. A summary of the five (5) proposed 2024 Updates to the IPP Rules is as follows:

1. The term “Non-residential water meter” is now defined to clarify its use in applying the IWC Meter Charge. (Page 7 of 89)
2. The definition for “PFAS Compounds” is modified to include eleven (11) additional compounds identified by Michigan EGLE. (Page 8 of 89)
3. The definition of “Total Phenolics Compounds” is revised to clarify its meaning. (Page 10 of 89)
4. Revised and/or new local pollutant discharge limitations are proposed based on the approved June 2021 study as follows:
  - a. The Daily Maximum Limit for Total Phosphorus is reduced from 150 mg/l to 125 mg/l.
  - b. The Daily Maximum Limit for Available Cyanide is added for 1.5 mg/l.
  - c. The Daily Maximum Limit for Copper is reduced from 3 mg/l to 0.72 mg/l.
  - d. The Daily Maximum Limit for Mercury replaces the “Non-detect limit with a numerical value of 0.0002 mg/l.
  - e. The Daily Maximum Limit for Perfluorooctane Sulfonic Acid (PFOS) is added for 65 ng/l (nanograms per liter).
  - f. The Daily Maximum Limit for “Total Phenolic Compounds” is revised from 1 mg/l to 5 mg/l. (Pages 10-11 of 89)
5. A typographical correction is made to identify “seven (7)” phenolic compounds instead of eight (8). (Page 16 of 89)



### **Background**

The IPP is administered for the enforcement of local pollution controls following the objectives of the NPDES permit and the Clean Water Act (“CWA”). EGLE is currently negotiating GLWA/Detroit Water and Sewerage Department’s (“DWSD”) NPDES Permit and the IPP Rules have been updated to incorporate relevant changes.

On July 1, 2019 EGLE issued GLWA/DWSD’s current NPDES Permit, which required GLWA to (i) develop GLWA IPP Rules, (ii) develop and obtain approval from EGLE for a revised IPP based upon the aforementioned GLWA Rules, and (iii) amend the GLWA Rules to incorporate the Local Limits Evaluation report of June 1, 2021, as revised. The Updated 2024 IPP Rules address these requirements.

The Board approved the current GLWA IPP Rules on November 19, 2019. EGLE subsequently updated and approved the Local Pollutant Discharge Limits Evaluation and the Updated 2024 IPP Rules includes these limits.

### **Invitation for Public Comment**

GLWA is required by state and federal law to adopt binding rules and regulations to comply with all applicable state and federal laws, including, without limitation, the requirements of the Federal Water Pollution Control Act, 33 USC Section 1251, et seq., the General Pretreatment Regulations for Existing and New Sources of Pollution, 40 CFR 403, and the National Categorical Pretreatment Standards contained in 40CFR Sections 405-471.

A copy of the proposed rules may be found on the GLWA web site [www.glwater.org](http://www.glwater.org), or by contacting the GLWA at 313-297-5803. Public comments are being solicited and must be received on or before 11:59 pm of November 11, 2024. Comments may be submitted as follows:

Email:           Address the email to [iwc@glwater.org](mailto:iwc@glwater.org).

U.S. Mail:       GLWA – Industrial Waste Control  
                  Attn. Operations – Manager  
                  9300 West Jefferson  
                  Detroit, MI 48209

These rules are an important part of Great Lakes Water Authority’s compliance activities in accordance with our NPDES Permit MI0022802. We encourage you to review and provide your comments.