# **BASIS FOR DECISION MEMO**

Permit Processor: Thomas Miller

Date: March 16, 2023 Permit No. MI0023094

Designated Site Name: Hartford WWTP

Monitoring Point 001A: Authorization to discharge 0.35 MGD of treated municipal wastewater from Monitoring Point 001A through Outfall 001. Outfall 001 discharges to the Paw Paw River.

	Maximum Limits for Quantity or Loading				Maximum Limits for Quality or Concentration				Monitoring	Sample	Basis for
<u>Parameter</u>	Monthly	7-Day	Daily	<u>Units</u>	Monthly	7-Day	<u>Daily</u>	<u>Units</u>	Frequency	Type	<u>Limits</u>
Flow	(report)		(report)	MGD					Daily	Report Total Daily Flow	PWJ
Carbonaceous Biochemical Oxygen Demand (CBOD5)	73	120	(report)	lbs/day	25	40	(report)	mg/l	5x Weekly	24-Hr Composite	STS
Total Suspended Solids (TSS)	88	130	(report)	lbs/day	30	45	(report)	mg/l	5x Weekly	24-Hr Composite	STS
Ammonia Nitrogen (as N)							(report)	mg/l	Weekly	24-Hr Composite	WQC
Total Phosphorus (as P)	2.9		(report)	lbs/day	1.0		(report)	mg/l	5x Weekly	24-Hr Composite	WQS
Chloride							(report)	mg/l	Monthly	24-Hr Composite	WQC
Sulfate							(report)	mg/l	Monthly	24-Hr Composite	WQC
Fecal Coliform Bacteria					200	400	(report)	cts/ 100 ml	5x Weekly	Grab	WQS
Total Residual Chlorine							38	ug/l	5x Weekly	Grab	WQBEL
Total Mercury										1	•
Corrected	(report)		(report)	lbs/day	(report)		(report)	ng/l	Quarterly	Calculation	WQC
Uncorrected							(report)	ng/l	Quarterly	Grab	WQC
Field Duplicate							(report)	ng/l	Quarterly	Grab	WQC
Field Blank							(report)	ng/l	Quarterly	Preparation	WQC
Laboratory Method Blank							(report)	ng/l	Quarterly	Preparation	WQC

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	Maximum Limits for Quantity or Loading				Maximum Limits for Quality or Concentration						
<u>Parameter</u>	12-Month Rolling Avg	7-Day	Daily	<u>Units</u>	12-Month Rolling Avg	<u>7-Day</u>	<u>Daily</u>	<u>Units</u>	Monitoring Frequency	Sample <u>Type</u>	Basis for <u>Limits</u>
Total Mercury	0.000012 / 0.000008			lbs/day	4.0 / 3.0			ng/l	Quarterly	Calculation	WQV
					Minimum % Monthly		Minimum <u>% Daily</u>				
CBOD5 Minimum % Removal					85		(report)	%	Monthly	Calculation	STS
TSS Minimum % Removal					85		(report)	%	Monthly	Calculation	STS
					Minimum <u>Daily</u>		Maximum <u>Daily</u>				
рН					6.5		9.0	S.U.	5x Weekly	Grab	WQS
Dissolved Oxygen					3.0			mg/l	5x Weekly	Grab	WQBEL

#### **PERMIT CONDITIONS:**

- Final Effluent Limitations, Monitoring Point 001A
- Quantification Levels and Analytical Methods for Selected Parameters
- Additional Monitoring Requirements
- Pollutant Minimization Program for Total Mercury
- Pollutant Minimization and Source Evaluation Program for Perfluorooctanesulfonic Acid (PFOS), Perfluorooctanoic Acid (PFOA), and Perfluorobutanesulfonic Acid (PFBS)
- Untreated or Partially Treated Sewage Discharge Reporting and Testing Requirements
- Facility Contact
- Monthly Operating Reports
- Continuous Monitoring
- PFAS Data Reporting Requirements
- Storm Water Pollution Prevention (not required)
- Michigan Industrial Pretreatment Program
- Residuals Management Program for Land Application of Biosolids

## NOTES:

For information pertaining to conventional pollutants and the establishment of certain permit conditions, see the Department's document named "ConvWQBEL\_HartfordWWTP\_23."

For information pertaining to the non-attainment status for certain designated uses of the receiving water and how it informed the establishment of certain permit conditions, see the Department's document named "WQBELBiologist Recommendations-MI0023094-02-15-2023."

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Monitoring requirements for chloride and sulfate have been included in the draft permit in accordance with the Department's <u>Chloride and Sulfate Water Quality</u> Values Implementation Plan (michigan.gov).

The facility is classified as a Bin 1 PFAS facility without reasonable potential to discharge PFOS, PFOA, or PFBS at levels exceeding Michigan Water Quality Standards. Monitoring and reporting requirements for PFOS, PFOA, and PFBS have been added to the permit in accordance with the <u>Municipal NPDES Permitting Strategy for PFOS and PFOA</u> (March 2023).

The biologist recommended DDT for inclusion in the effluent limitations based on an insufficiently sensitive lab test, however, this was not included in the permit limits due to no reasonable potential to discharge. If further samples are taken, please use an appropriately sensitive laboratory testing procedure to meet the QL given in Part I.A.2. of the permit.

## Limit Change Key

Normal Type = existing requirement - carried over from previous version of permit **Bold Type** = new requirement - not in previous version of permit *Italic* = deleted requirement - not carried over from previous version of permit

#### Basis for Limits Key

WQBEL - Water Quality-Based Effluent Limit

STS - Secondary Treatment Standard

WQC - Water Quality Concern

WQS - Water Quality Standard

WQV - Water Quality Variance

PWJ - Permit Writer's Judgment