



City of Jackson

TO: Mayor and Board of Aldermen

CC: Matt Winters, City Administrator

FROM: George L. Harris P. E., City Engineer

DATE: April 3, 2025

RE: Modification to Task Order 24-02 WWTP NPDES Permit Renewal Project

The proposed modification to Task Order 24-02 includes costs referenced under a Phase 1 and Phase 2 designation. The total modification is for an additional \$17,370.00 which includes \$3,000.00 for additional work related to the original scope of work plus \$14,370.00 for an additional scope of work which is referred to as Phase 2.

Original Task Order 24-02 (Phase 1) Cost	\$12,100,00
Additional Scope Costs for Phase 1	\$3,000.00 (see Note 1)
<u>Modification to Task Order 24-02, Phase 2</u>	<u>\$14,370.00 (see Note 2)</u>
Total Modification to Task Order 24-02	\$17,370.00
Revised Total for Task Order 24-02	\$29,470.00

Note 1: The original Task Order included assisting the city in submitting a permit renewal application for the city's WWTP NPDES permit. Phase 1 included the initial permit application. Additional cost includes time not originally budgeted for completion of a "no exposure" form.

Note 2: Phase 2 includes additional scope to assist with the draft NPDES permit review process. The new scope includes a local limit evaluation, **due 180 days after city's new NPDES permit is issued** and is the result of DNR review comments generated during the renewal process. The Local Limit requirement is a "needs" evaluation. Based on this evaluation, a report will determine if the city's local limits associated with the city's **industrial pretreatment program** are adequate (MDNR calls it Part 1) or if they need updating (MDNR calls it Part 2).

Additional:

If updates are needed (Part 2), the report will include a second part, and the city will need to submit a program update to MDNR, including updates to the local limits in our City Ordinances. The current goal is to ensure that the current limits adequately protect your wastewater system and establish that Part 2 will not be required.