

Collection Systems: Michigan is Pursuing a General Permit

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Water Resources Division

Protect and Monitor

- 💧 4 Great Lakes and Lake St. Clair
- 💧 11,000 inland lakes
- 💧 76,000 river and stream miles
- 💧 6.5 million acres of wetlands
- 💧 74,000 acres of coastal dunes
- 💧 Groundwater

For swimming, fishing, drinking water, and aquatic ecosystems.



The General Permit for Collection Systems

- Internal/External stakeholder group
- The group gathered information
- Consultants and local system operators have been important members and have developed portions of the draft permit
- First draft of the permit was just sent out for group review
- Note that separate sanitary collection systems are part of the POTW, combined collection systems are not

Why do we need the General Permit (GP)

- GP will contain important CMOM requirements (capacity issues, management, operations and maintenance, rehabilitation).
- GP will contain Asset Management and Inspection frequency requirements
- Collections systems must be maintained, and many haven't been.
- ~500 collection systems not covered by NPDES permits.
- Currently address collection systems under Part 41; Reactive instead of proactive. SSOs in ACOs.
- High wet weather flows at some Regional WWTPs. Flows have not been adequately reduced over time.

Requirements in Collection System GP

- Outlet and internal capacity restrictions (CMOM), address flows to meet excessive I/I definition or another acceptable regional criteria
- Proper Operations
- Asset management (AM)
- Inspection program
- SSO prohibition
- fiscal sustainability
- incentives to participate

Capacity

- Satellite collection systems that are tributary to a regional plant.
- Eliminate internal capacity restrictions.
- Eliminate exceedances of flows greater than contract capacity
- Investigate I/I if peak flows exceed the federal I/I definition or if there are SSOs or contributions to SSOs

Asset Management

- A program for maintaining a desired level of service for what you want the assets to provide at the lowest life-cycle cost. Lowest life-cycle cost refers to the best appropriate cost for rehabilitating, repairing, or replacing an asset.
- In a wastewater system, an "asset" is a component of a facility with an independent physical and functional identity and age (e.g., pump, motor, clarifier, etc.).

Asset Management

Five Core Questions of Asset Management

1. What is the current state of my assets?
2. What is my required "sustainable" level of service?
3. Which assets are critical to sustained performance?
4. What are my minimum life-cycle costs?
5. What is my best long-term funding strategy?

Benefits of Coverage

- Address SSOs under a NPDES permit and not an order (ACO)
- Address high flows at some regional WWTPs by reducing flows at contributing collection systems
- Ensure important asset management programs, elimination of capacity restrictions, flexible programs to set inspection frequencies, fiscal sustainability
- Provide for some incentives (still need to be reviewed by the DAG)

Questions/Staff Contact

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