

Gail McLeod
Mayor

City of Allen Park
15915 SOUTHFIELD ROAD
ALLEN PARK, MICHIGAN 48101-2512
PHONE: 313-928-1470
gmcleod@cityoffallenpark.org



April 29, 2025

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

**EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41
Administrative Rules**

Dear Ms. Sarver:

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would affect my community of Allen Park. The City of Allen Park has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The Allen Park Department of Public Services (DPS) has the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. In fact, it would be quite detrimental and have an extremely negative impact on our economy.

While we have been able to maintain current staffing levels, like most other communities, we experience difficulties in filling openings. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work. Like several other communities in the area, Allen Park was under a State Financial Emergency Manager. While we have improved our financial status since being released from State oversight, we are still having to deal with increased expenses and revenue which has not fully recovered from the housing market downturn which began in 2007.

Our Department of Public Service currently inspects, repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-

tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink that reads "Gail McLeod". The signature is fluid and cursive, with the first name "Gail" and last name "McLeod" clearly distinguishable.

Gail McLeod
Mayor

c:Tom Murray, City Administrator
Aaron Filipski, DPS Director

Charter Township of Brownstown



Department of Public Works

21313 TELEGRAPH ROAD
BROWNSTOWN, MICHIGAN 48183-1399
(734) 675-4000 / FAX (734) 675-2921

Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
Attention to: Alyssa Sarver
525 West Allegan Street
PO Box 30458
Lansing, MI 48909

Re: EGLE Public Hearing for 2024-52 EQ: Sewerage Systems Part 41 Administrative Rules

Dear Ms. Sarver:

I'm writing to you to comment on the proposed changes to the 2024-52 EQ Rule that would effect my community of Brownstown. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The Charter Township of Brownstown Department of Public Works has the leadership, expertise, and staffing available to successfully maintain our collection system. We don't feel that having State mandated additional educational, experience and licensing requirements for collection system maintenance staff is needed for our community. The restrictive educational requirements will make it much more difficult to hire the staff that perform our critical work. Any required certification program would add additional costs to our maintenance program overhead that would shift money from the critical inspection and repair work that we do.

Our Department of Public Works doesn't need additional requirements that would inflate our current overhead costs. Our department currently inspects, repairs defects, and tracks the important work we do with efficiency that's been proven over time. Any additional work performance tracking requirements will also divert effort and shift budget away from the actual collection system work.

Thank you for your consideration of our comments,

Regards,

Justin Danosky, Director of Public Works

Archived: Monday, May 5, 2025 9:53:34 AM
From: [Angela Hysinger](#)
Mail received time: Tue, 29 Apr 2025 14:24:09
Sent: Tue, 29 Apr 2025 10:25:27
To: [EGLE-WRD-OpCert](#)
Cc: [Tracey Balint](#) [Leon Luedeman](#) [Bill Fritz](#)
Subject: Public Comment Pertaining to Part 41 Rule Changes
Importance: Normal
Sensitivity: None

\cbpat2\qcCAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Good Morning -

Thank you for the presentation on the forthcoming changes to EGLE's Sewerage System Rule. On behalf of the City of Rochester Hills we are submitting the following questions / comments to be included as part of the public comment record.

- 1) Under R 299.2918 Rule 18 (2) states additional education or experience of an applicant may be substituted by the department for meeting the minimum qualifications prescribed in subrule (1) of this Rule. Will there be more elaboration on what will be acceptable education/experience substitutes for some of the more stringent requirements for C1 and C2 licenses? Specifically, the college degree requirement in an engineering or science related field.
- 2) The City has concerns with the college degree requirement as none of our operators have college degrees specifically in engineering or science, but they have decades of years of experience, hold other required state licenses, and are more than capable of running our collections system and have been doing so for years. We would like for there to be consideration towards an alternate option for meeting this requirement that does not require going back to college.
- 3) This bullet is more of a statement, but we would like to point out that those employees that do have degrees in engineering or science are typically not running the collections system, so do not have the years of experience required in operating the system. Similarly those who have experience with operating the system do not typically have college degrees in engineering or science. Therefore it is hard for any one person to meet the requirements of a C1 or C2 license.
- 4) Will there be any training/prep courses or practice tests/problems available for the individual licenses?
- 5) Will more than one licensee be required (i.e. a primary and secondary) similar to how the S licenses operate?
- 6) Will any other college degrees be accepted? In our specific situation, would a business degree be acceptable to meet the college degree requirement?

Thank you again for this opportunity to voice our comments.

Please feel free to reach out if you would like to discuss further.



innovative *by* nature

Angela Hysinger, PE, CFM

Public Utilities Engineering Manager
Department of Public Services

248-841-2486
rochesterhills.org

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JESUS R. PLASENCIA, P.E.
CITY ENGINEER

April 29, 2025

Ms. Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

**RE: EGLE Public Hearing for Rule Set 2024-52 EQ:
Sewerage Systems Part 41 Administrative Rules**

Dear Ms. Sarver;

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would adversely affect the City of Wyandotte. Wyandotte has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The City of Wyandotte Engineering and Building Department and the Department of Public Services has the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, diverting money away from critical inspection and repair work.

Our Engineering and Building Department and the Department of Public Services currently inspects, repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.

Very truly yours,

Jesus R. Plasencia, P.E.
City Engineer



Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

**EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41
Administrative Rules**

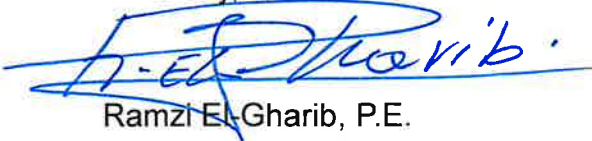
I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would affect my community of Westland, Wayne County. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The City of Westland Department of Public Services has the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

Our Department of Public Services currently inspects, repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.

Sincerely,



Ramzi El-Gharib, P.E.

DPS Director

City Of Westland

Archived: Monday, May 5, 2025 9:54:40 AM
From: [Kevin Johnson](#)
Sent: Tue, 29 Apr 2025 19:23:19
To: [EGLE-WRD-OpCert](#)
Subject: 2024-52 EQ - Wastewater Certification Comment
Importance: Normal
Sensitivity: None

\cbpat2\qcCAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Good Afternoon:

I had a few comments on the new requirements for wastewater certification:

- A lot of municipalities have their DPW oversee Part 41 permits, and there may not be engineers within that department. With the request of a C1 operator to have a 4-year college degree in science, engineering, or “related” field, what constitutes a related field? I have a bachelor’s in business administration; would I qualify? I would hate to have the new rule put an undue hardship on our engineering department to have to obtain this certification.
- I want to make sure I understand this rule correctly, but because myself and our engineers have overseen our collection system, we would be able to test two times at the C1 level, given that we serve over 90,000 residents.
- Also, if we do not pass in those two tries, we would be able to test at the C2 level. How many times do we get to try at that level?

Thank you for your time.

\cbpat4Sincerely,

\cbpat4

\cbpat4Kevin J. Johnson, CPM | DPW Director

\cbpat4Macomb Township

\cbpat451650 Card Rd.

\cbpat4Macomb, MI 48042

\cbpat4Email: johnsonk@macomb-mi.gov

\cbpat4Direct Line: 586.598.0687, ext. 2709

\cbpat4Work Cell/Text: 586.817.8816

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

**EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41
Administrative Rules**

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would affect my community of Northfield Township. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The Northfield Township Wastewater Treatment Plant has the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

Our Wastewater Treatment Plant Staff currently inspects, repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.

Best regards,

Brian MacDonald

Superintendent



CITY OF MILAN

147 WABASH STREET, MILAN MI 48160
PHONE: (734) 439-1501
www.milanmich.org

OFFICE OF THE MAYOR
AND CITY ADMINISTRATION

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41 Administrative Rules

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would affect my community of the City of Milan. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

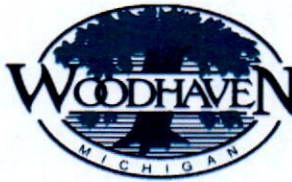
The City of Milan Department of Public Works, in conjunction with our sanitary sewer operators, Fleis and VandenBrink (FVOP) have the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

Our Department of Public Works and FVOP currently inspects repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.
Best regards,

James Lancaster
City Administrator/DPW Director

PATRICIA A. ODETTE, Mayor
JANET SIKES, Mayor Pro-tem
ROBERT TOTH, Council Member
DONALD BELCHER, Council Member
DARREL PENIX, Council Member
PRESTON ABADIE, Council Member
J.C. MOCZYDLOWSKY, Council Member



CITY OF WOODHAVEN
21869 West Road
Woodhaven, Michigan 48183
Phone: (734) 675-3000
Fax: (734) 675-4948
www.woodhavenmi.org

April 30, 2025

Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
Attention to: Alyssa Sarver
525 West Allegan Street
PO Box 30458
Lansing, MI 48909

RE: EGLE Public Hearing for 2024-52 EQ: Sewerage Systems Part 41 Administrative Rules

Dear Ms. Sarver:

I'm writing to you to comment on the proposed changes to the 2024-52 EQ Rule that would affect my community of Woodhaven. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The City of Woodhaven Department of Public Works/Water & Sewer has the leadership, expertise, and staffing available to successfully maintain our collection system. We don't feel that having State mandated additional educational, experience and licensing requirements for collection system maintenance staff is needed for our community. The restrictive educational requirements will make it much more difficult to hire the staff that perform our critical work. Any required certification program would add additional costs to our maintenance program overhead and that would shift money from the critical inspection and repair work that we do.

Our Department of Public Works/Water & Sewer doesn't need additional requirements that would inflate our current overhead costs. Our department currently inspects, repairs defects, and tracks the important work we do with efficiency that has been proven over time. Any additional work performance tracking requirements will also divert effort and shift budget away from the actual collection system work.

Thank you for your consideration of our comments.

Regards,

A handwritten signature in blue ink, appearing to read "Tim Neighbors".

Tim Neighbors
Director
City of Woodhaven Department of Public Works/Water & Sewer

www.farmgov.com

33720 West Nine Mile Road
Farmington, Michigan 48335



Public Works Department

Telephone 248-473-7250
Fax 248-473-7279
farmingtondpw@farmgov.com

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

**EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41
Administrative Rules**

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would have a negative effect on the City of Farmington. Farmington has a history of successfully managing its sanitary collection system without the State oversight proposed in this rule change.

Farmington's Department of Public Works has the leadership, expertise, and staffing available to continue successfully maintaining the City's collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for the City of Farmington. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

Farmington's Department of Public Works currently inspects, repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.

Best regards,

A handwritten signature in blue ink that reads 'Charles J. Eudy'. The signature is fluid and cursive, with the first name 'Charles' being the most prominent part.

Charles J. Eudy
Superintendent of Public Works

Byron Nolen, Mayor
City of Inkster
26215 Trowbridge
Inkster, MI 48141
Bnolen@cityofinkster.com



April 30, 2025

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

**EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41
Administrative Rules**

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would affect my community of Inkster, MI. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The City of Inkster's Department of Public Services has the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

Our Department of Public Services currently inspects, repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.

Best regards,

A handwritten signature in black ink, appearing to read 'Byron H. Nolen', is written over a light blue horizontal line.

Byron H. Nolen
Mayor
City of Inkster



Huron Charter Township

22950 Huron River Drive • New Boston, MI 48164-9791
(734) 753-4466 • Fax (734) 753-4111
www.hurontownship-mi.gov

4/29/25

Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
Attention to: Alyssa Sarver
525 West Allegan Street
PO Box 30458
Lansing, MI 48909

Re: EGLE Public Hearing for 2024-52 EQ: Sewerage Systems Part 41 Administrative Rules

Dear Ms. Sarver:

I'm writing to you to comment on the proposed changes to the 2024-52 EQ Rule that would affect my community of Huron Charter Township. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The Huron Charter Township Department of Public Works has the leadership, expertise, and staffing available to successfully maintain our collection system. We don't feel that having State mandated additional educational, experience and licensing requirements for collection system maintenance staff is needed for our community. The restrictive educational requirements will make it much more difficult to hire the staff that perform our critical work. Any required certification program would add additional costs to our maintenance program overhead that would shift money from the critical inspection and repair work that we do.

Our Department of Public Works doesn't need additional requirements that would inflate our current overhead costs. Our department currently inspects, repairs defects, and tracks the important work we do with efficiency that's been proven over time. Any additional work performance tracking requirements will also divert effort and shift budget away from the actual collection system work.

Thank you for your consideration of our comments,

Regards,

Eric Scanland

Huron Charter Township DPW Director

Board of Trustees

Kelly Trombly - Supervisor • Julie Martin - Clerk • Colleen Lazere - Treasurer
Donna Mendrysa - Trustee • David Patterson - Trustee • Bryan Polce - Trustee • René Ward - Trustee

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

April 30, 2025

**RE: EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41
Administrative Rules**

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would affect my community of the Charter Township of Orion. My community has a history of successfully managing our sanitary collection system without the State oversight proposed in this rule change.

The Charter Township of Orion Department of Public Services has the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

Our Department of Public Services currently inspects, repairs, and tracks work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work.

Thank you for your consideration of these comments.

Best regards,

A handwritten signature in blue ink, consisting of a stylized 'C' followed by a horizontal line that extends to the right.

Chris Barnett

Supervisor

Charter Township of Orion



April 30, 2025

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and
Energy Water Resources Division
525 West Allegan Street
PO Box 30458
Lansing, MI 48909

EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41 Administrative Rules

Dear Ms. Sarver:

I am writing regarding my concerns about the proposed changes to Rule Set 2024-52 EQ, which would affect my community of Redford Township significantly. Redford Township has a strong history of successfully managing our sanitary collection system and north retention basin without the State oversight proposed in this rule change.

The Redford Township Department of Public Services has the leadership, expertise, and staffing available to continue successfully maintaining our collection system and retention basin. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification programs would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

Our Department of Public Services staff currently inspect, repair, and track work done on the sanitary collection system, with proven efficiency. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work and numerous other much-needed capital improvement projects.

Thank you for your consideration of these comments.

Best regards,


Pat McRae, Supervisor
Charter Township of Redford



Public Services

Alyssa Sarver
Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street, PO Box 30458
Lansing, MI 48909

RE: EGLE Public Hearing for Rule Set 2024-52 EQ: Sewerage Systems Part 41 Administrative Rules

Dear Ms. Sarver:

I am writing to comment on the proposed changes to Rule Set 2024-52 EQ, which would have a significant impact on the Wayne County Sewage Disposal System and its associated retention treatment basin facilities. We believe that we can continue to successfully managing our sanitary collection system without the additional requirements proposed by the State in this rule change

The Wayne County Department of Public Services has the leadership, expertise, and staffing available to continue successfully maintaining our collection system. We do not feel that additional State-mandated educational, experience, and licensing requirements for collection system maintenance staff are necessary for our community. The restrictive educational requirements would make it significantly more difficult to hire staff to perform this vital work. Furthermore, any required certification program would add additional costs to our maintenance overhead, shifting money away from critical inspection and repair work.

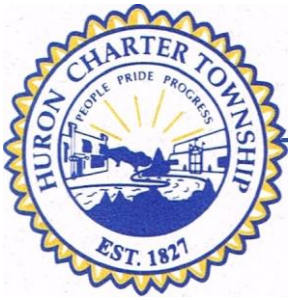
Our Department of Public Services currently inspects, repairs, and monitors work done on the sanitary collection system and is currently in the process of investing more than \$100 million in asset management and capital improvement projects. Any additional performance-tracking requirements will divert effort and budget away from the actual collection system work that improves water quality.

Wayne County urges the State to reconsider these proposed rule changes that will increase costs to our 13 customer communities and more than 420,000 residents served by our collection system.

Sincerely,

Patrick Cullen

Patrick Cullen, Division Director
Wayne County Department of Public Services
Environmental Services Division



Huron Charter Township

22950 Huron River Drive • New Boston,
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www.hurontownship-mi.gov

April 30, 2025

Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
Attention to: Alyssa Sarver
525 West Allegan Street
PO Box 30458
Lansing, MI 48909

Re: Comments on Proposed Changes to the 2024-52 EQ Rule: Sewerage Systems Part 41
Administrative Rules

Dear Ms. Sarver:

I am writing to address the proposed changes to the 2024-52 EQ Rule, which would significantly impact my community, Huron Charter Township. Our township has a long-standing history of effectively managing our sanitary collection system without the need for State oversight as outlined in this proposed rule. Currently, our sewerage system operates through the South Huron Valley Utility Authority (SHVUA).

The Huron Charter Township Department of Public Works possesses the leadership, expertise, and staffing required to efficiently maintain our collection system in collaboration with SHVUA. We believe that the additional State-mandated educational, experiential, and licensing requirements for collection system maintenance staff are unnecessary for our community. These restrictive educational criteria would create hiring challenges for the critical roles required to perform our essential work. Furthermore, any mandated certification program would increase maintenance program overhead costs, diverting funds away from vital inspection, repair, and infrastructure work.

Our Department of Public Works has consistently demonstrated success in maintaining a reliable and efficient collection system. Introducing additional requirements would inflate overhead costs without adding tangible value. Currently, our department effectively inspects, addresses system defects, and tracks our work, leveraging a proven and efficient system. Additional tracking and performance requirements would only redirect efforts and budgets away from essential collection system operations.

Thank you for considering our perspective on these proposed changes. We hope you take our concerns into account as you evaluate this rule.

Regards,
Kelly M. Trombly
Supervisor, Huron Charter Township
ktrombly@hurontownship-mi.gov

Board of Trustees

Kelly Trombly - Supervisor • Julie Martin - Clerk • Colleen Lazere - Treasurer
Donna Mendrysa - Trustee • David Patterson - Trustee • Bryan Polce - Trustee • Renee
Ward - Trustee



April 30, 2025

Michigan Department of Environment, Great Lakes, and Energy
Water Resources Division
525 West Allegan Street
PO Box 30458
Lansing, MI 48909

Attn: Ms. Alyssa Sarver

Sent Via Email Only: EGLE-WRD-OpCert@Michigan.gov

Re: EGLE Water Resources Division proposed rule changes for
Sewerage Systems (2024-52 EQ,) review comments

Dear EGLE Staff:

I appreciate the ongoing efforts of the Michigan EGLE to ensure that Michigan remains a leader in protecting water quality for our State and our residents. Surface water quality has improved significantly in our lifetimes because of ongoing collaborative efforts between regulators, engineers, municipalities, and the public. We know that EGLE's proposed sanitary sewerage rule changes are intended to further reduce and address system deficiencies, particularly sanitary sewer overflows, that may occur in collection systems that discharge to other treatment systems and therefore do not have direct regulation via an NPDES permit.

I offer the following comments and questions in an effort to ensure that the rules and regulations are written so that they can be clearly understood by all stakeholders while also considering the need to balance improved water quality with the institutional resources required to meet them, including affordability. I appreciate the opportunity to provide this feedback.

1) PART 1

R 299.2903 Definitions

- Suggest adding definition for "connections." Does a connection mean a sewerage system customer determined by having a customer account for sewerage system services?
 - Most systems count and/or bill sanitary customers based on connections to water meters. There may not be an accurate count specifically to sanitary only customers. Some sanitary customers may also have multiple water meters for various reasons.
 - If a "connection" is based on the number of private lateral connections to a sewer system, it should be considered that some single-family residential homes may have multiple sanitary lateral connections and/or there may be a single lateral connection for multiple, detached single family homes that "wye" together upstream of the sewerage system.
 - Most systems likely have an estimate of sanitary sewer customers based on the above criteria but likely will not have an exact count.
 - The Part 41 permits for construction of sanitary sewerage systems traditionally asked for number of "REUs." Suggest considering use of this in lieu of "connections" for consistency with basis of design documents on file, etc.
 - Wastewater Treatment Plants are classified by "population," would use of this term for collection systems be better for consistency?
 - How are wholesale customers defined? The use of the word, "connection" could be confused to mean a single connection from a wholesale customer providing service to an entire community. (For instance, a regional interceptor system could be argued to only have six or seven connections, etc.)

2) PART 2

R 299.2911 Initial treatment facility and collection system classification.

Rule 11 (5)

- Suggest revising Class RTB (or CSO Facility) description as follows: “Class RTB, treatment facilities that treat overflows from a combined sewer system to surface waters in accordance with its NPDES permit.”
 - Many RTBs do not have screens and most do not dechlorinate.
 - Another suggestion could be “...utilizing technologies that screen and disinfect or store, settle, skim and disinfect overflows prior to discharge to surface waters.” (The phrase “settle, skim and disinfect” has been widely used in the historical basis of design reports for RTBs.)

Rule 11 (6a)

- Class C1 sewer systems description seems inconsistent with following descriptions of C2 through C4 systems.
 - The description for C1 of “additional treatment component or components, such as chemical addition, equalization, solids removal or other components” is not clear to me. How else are flows transported in a sewer system other than “...through a combination of gravity sewers, gravity sewers and pump stations with force mains, or low-pressure sewer systems.”? I assume this is an effort to distinguish the more typical sewer systems in C2 through C4 systems from systems that should be C1 because they incorporate some of the facilities noted below.
 - Is C1 meant to include systems with sanitary retention facilities or off-line storage systems used for temporary storage of wet weather flows? The term, “Equalization Basin,” is more typically used for storage facilities at a WWTP or WRRF. Suggest “sanitary retention facilities,” if that is what is intended and perhaps have a minimum storage volume of perhaps 0.5 MG.
 - Is in-system storage (either online or offline) intended to be included in this classification? Having a minimum volume as suggested above may help distinguish between sanitary retention tanks and smaller pump stations that may use sewer pipes (either in-system or offline) for temporary storage of peak wet weather flows, which typically do not have additional mechanical equipment such as flushing systems or dewatering pumps.
 - Is “chemical addition” meant to include disinfection upstream of CSO facilities? What about chemicals and other treatment methods used to control FOG, odor and/or H₂S in certain pump stations and systems with long residence times? Is it also intended to include these types of systems?
 - Does “solids removal” mean screening, such as at certain pump stations? Does this include in-system grinders?
 - Suggest revising to state all sewer systems include the gravity sewers, etc. and then differentiate C1 to include those systems with larger wet weather storage and/or treatment facilities and equipment (if that was the goal.)
- If there is a contract operator (municipal agency or private company) overseeing multiple systems, how many licensed staff are required? One for each system?

R 299.2918 Operation certification, minimum requirements

Rule 18 (1.a.i.A)

- For Class A, does “possess a college degree” mean a 4-year or 2-year degree? Note that in Rule 18(1.i.i.A and 1.i.ii.A) these distinguish between 4- and 2-year degrees.
- A 4-year degree for a C1 seems unnecessary for the skills required.
 - It seems like 2-year degrees are focused on more practical applications (math, English, and basic science) while 4-year degrees more typically include coursework that would not be applicable, such as requirements for foreign language, literature and history, etc. There is a significant shortage of qualified workers in the industry and EGLE’s Regulatory Impact Statement and Cost-Benefit Analysis report an average base salary of \$24.81/hour, which would not attract a person with a four-year college degree, particularly in STEM fields.

- An informal search of publicly available information shows that Class A operators in Michigan generally make over \$100,000 per year with substantial benefits. There are communities currently struggling to find qualified WWTP operators due to offering pay based on the \$24.81/hour estimate.
 - The average cost of a four-year degree in Michigan is currently about \$10,000 per year for tuition only (not including any housing, food, books, fees, etc.) and has increased at a rate of over 20% over the past 10 years. The current interest rate for Federal student loans is 6.5%. It will continue to be a challenge to attract new workers to this industry if a four-year degree is required.
 - The type of work involved with managing a collection system often includes a fair amount of manual labor, which is also more typically done by men. Enrollment at college, and especially in four-year programs, for men is continuing to decrease. GLWA, Grand Rapids and others have started to implement programs to attract new employees through trades programs and have been successful in attracting people who do not want to attend college into the industry, so adding a four-year degree requirement may negatively impact these programs.
- Suggest therefore that any references to secondary education should allow for operators to accrue “semester hour equivalents” through EGLE or trade association training programs. This would allow workers to access ongoing training while working. Achieving a Class C1, which requires years of hands-on experience and a college degree, would be very difficult for people new to the industry. Either someone must graduate with a four-year degree and be willing to start their career by doing several years of manual labor or start in a manual labor job and take classes to get their four-year degree while working.

3) PART 3

R 299.2935 Engineering reports; basis of design; minimum requirements.

Rule 35 (4)

- Suggest additional consideration of “privately owned sewerage system,” to consider where the public sewer “starts.” If multiple buildings are connected into a sanitary pipeline, where does the “lead” or “lateral” end and the “public sewer” begin? Should the demarcation be where it leaves a particular parcel or property line?
- There were additional comments made on this rule by a private system operator at the public hearing who made some comments in reference to this, which should be considered.
- The escrow and operational requirements would be a significant hardship if applied to multiple buildings on a school campus, condominium development, etc. in cases where this type of connection may be considered a local lateral.

R 299.2938 Plans and specifications; review by department.

Rule 38 (1)

- Suggest adding that department review staff will have a professional engineer’s license in the state of Michigan.

R 299.2942 Revisions to approved plans

Rule 42 (1)

- Are “minor modifications” limited to minor changes of locations sewer pipes and manholes? What would require a new permit application once construction has started?
 - Suggest defining “minor changes” as “changes that do not affect capacity, flow, isolation distances, or operation and maintenance” to better accommodate normal changes to construction work at treatment facilities, which often require change orders during construction to accommodate equipment as supplied by the manufacturer or to address unforeseen conditions. This includes minor changes to the design point of pumps and blowers, for example, as well as dimensions of tanks (with minor changes to storage volumes) and configurations of piping to match skid-mounted equipment packages.

I hope this feedback has been useful and will be constructive. If you have any questions or require any additional information, please feel free to contact me.

Very truly yours,

HUBBELL, ROTH & CLARK, INC.



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