

Antidegradation Demonstration/Exemption Checklist

Permit Processor: Sean Syts

Designated Name: Gerald R Ford Intl Airport-GR

Permit No.: MI0055735

Permit Action: modification

Permit ID.v: 82037.2

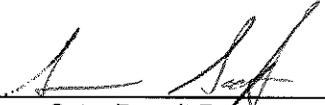
Priority: 1

1. Application is for a: New Use Increased Discharge
 2. Are there existing uses which require greater protection than the designated uses?
 No Yes – Provide explanation: _____
 3. Does the receiving water meet Water Quality Standards?
 Yes No – Provide explanation as to what parameter is in non-attainment: The Thornapple River is not attaining WQS for PCBs. The discharge should not contribute to these nonattainment issues.
 4. Is the proposed discharge directed to an Outstanding State Resource Water (OSRW)?
 No Yes – If the proposed discharge cannot meet water quality standards, propose denial of application. Provide explanation: _____
 5. Is applicant exempt from Rule 98 Requirements?
 No Yes – Provide explanation, and then skip to line 13: _____
 6. Identify the social or economic development and benefits to the area that are addressed in the submitted antidegradation statement (check all that apply).
 - (I) Employment Increases
 - (II) Production Level Increases
 - (III) Employment Reduction Avoidance
 - (IV) Efficiency Increases
 - (V) Industrial, Commercial, or Residential Growth
 - (VI) Environmental or Public Health Problem Corrections
 - (VII) Economic or Social Benefits to the Community
 - Other – provide explanation: _____
- Did the applicant provide a thorough and specific identification of benefits that would be foregone if the lowering of water quality was not allowed? Yes No – Inform the applicant that additional information will be needed, or the application will be considered incomplete.
- Does the information submitted by the applicant appear to support the notion that the proposed discharge will provide important social or economic benefits? Yes
 No – Provide an explanation as to why the submitted information is contradictory to the proposed demonstration: _____
7. Is there a potential for lowering of the water quality associated with a thermal discharge?
 No Yes – Provide explanation: _____
 8. Does the application indicate the presence of any Bioaccumulative Chemicals of Concern?
 No Yes – Provide explanation as to what implications Rule 323.1098 may have on this proposed discharge with regards to the BCC: _____
 9. Did the applicant provide an explanation as to why the proposed discharge is necessary over other alternatives?
 No – Inform applicant that alternatives need to be addressed.
 Yes – Provide explanation: Several Alternatives were provided. The airport evaluated a direct discharge to the Thornapple River, a discharge to the Grand Rapids Treatment Plant, centralized deicing operations, and a detention and treatment system. See the Antidegradation Demonstration for the complete evaluation of alternatives.
 10. Is connection to an existing municipal treatment system a viable alternative to a surface water discharge (i.e., distance, available capacity)?
 Yes – Advise applicant to connect to the existing treatment system.
 No – Provide explanation: Discharging deicing fluid to the Grand Rapids Wastewater Treatment Plant (WWTP) was evaluated. Technically, the wastewater could and has

been sent to the WWTP but it was determined to be cost prohibitive. Due to the high BOD load, the WWTP would have required that a detention area be built for the incoming deicing fluid in order to prevent operational issues. The high strength wastewater would have need to be fed into the system at a controlled rate to prevent bacterial slimes from developing in the treatment plant. Municipal treatment and collection systems typically prefer not to accept wastewater that is comingled with storm water because they end up treating large volumes of water that essentially do not require to be treated. Due to the additional constrains associated with the Grand Rapids WWTP, it is appropriate for alternative options to be considered.

- 11. Is the application for a privately-owned treatment system serving the public for the treatment of domestic wastewater from two or more residences? No, proceed to #12 Yes
If Yes – Has the applicant provided a resolution for continuation of service from the local unit of government (LUG) or have alternate means to ensure proper operation and maintenance of the treatment system been established?
 Yes – If alternate means, explain: _____
 No – Contact LUG and provide brief explanation of circumstances behind the decision: _____
- 12. Will the proposed discharge cause substantial impact on certain designated uses, such as important spawning areas or high quality inland lakes, even though the designated uses continue to be fully supported?
 No
 Yes – Provide an explanation as to which uses will be impacted. Discuss the situation with your supervisor and document what decisions were made: _____
- 13. Were any comments received from the public regarding Antidegradation? PN date: May 29, 2013 – June 28, 2013 with an extension through 5 PM of July 8, 2013
 No Yes – Provide brief description of comments: Description of the comments can be found in the responsiveness summary.
- 14. Does the submitted demonstration satisfy the requirements of Rule 323.1098?
 N/A - Exempt Yes No – Provide explanation: _____

Antidegradation Demonstration reviewed by:



Sean Syts, Permit Processor
Lakes Michigan and Superior Permits Unit
Permits Section, Water Resources Division, DEQ

7/31/2013
Date

Antidegradation Demonstration Approved by:



Philip Argiroff, Chief
Permits Section
Water Resources Division, DEQ

7/31/13
Date