



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 24, 2021

VIA EMAIL

Mr. Casey Ries, Engineering and Facilities Director
Gerald R Ford International Airport Authority
5500 44th Street SE
Grand Rapids, Michigan 49512

VN No. VN-011579

Dear Mr. Ries:

SUBJECT: Violation Notice (VN) No. VN-011579
Per- and Polyfluoroalkyl Substances (PFAS)
National Pollutant Discharge Elimination System (NPDES)
NPDES Permit No. MI0055735
Designated Name: Gerald R Ford Intl Airport-GR

On December 30, 2019, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Water Resources Division (WRD), Grand Rapids District Office (GRDO) received the results of the Short-Term Storm Water Characterization Study (STSWCS) conducted on July 16, 2019, July 18, 2019, September 22, 2019, October 2, 2019, at the Gerald R Ford Intl Airport-GR facility located at 5500 44th St SE, Grand Rapids, MI 49512 (Facility). Gerald R Ford International Airport Authority (Permittee) was issued NPDES Permit No MI0055735 (Permit) to discharge storm water associated with industrial activity to waters of the state named the Thornapple River and Plaster Creek from the Facility. In accordance with the Permit, the WRD required the Permittee to conduct the STSWCS in Compliance Communication No. CC-001902 issued on April 8, 2019.

The objective of the STSWCS was to evaluate concentrations of PFAS, specifically perfluorooctanesulfonic acid (PFOS) and perfluorooctanoic acid (PFOA), and other pollutants of concern in storm water discharges from outfalls at the Facility to determine compliance with the Water Quality Standards (WQS) established in accordance with R 323.1057 (Rule 57) of the Part 4 WQS rules promulgated pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act (NREPA), MCL 324.3101 *et seq.* Based on a review and analysis of the data provided by the Permittee, including the STSWCS results, it appears that the discharged PFOS exceeds the WQS for PFOS. A summary of the sample results is provided in the following table with exceedances indicated in **bold**.

Sample Location	Sampling Conditions	Sample Date	Pollutant	Result	Applicable Criteria at Monitoring Point
Outfall 011	Wet Weather	7/16/2019	PFOS	23.5 ng/L	12 ng/L
Outfall 011	Dry Weather	7/18/2019	PFOS	44.1 ng/L	12 ng/L
Outfall 011	Wet Weather	9/22/2019	PFOS	13 ng/L	12 ng/L
Outfall 011	Wet Weather	10/2/2019	PFOS	13.5 ng/L	12 ng/L

The Permit authorizes the Permittee to discharge storm water associated with industrial activity to the Thornapple River and Plaster Creek if it meets the criteria established in the Permit. The Permit does not authorize discharges that may cause or contribute to a violation of a WQS. Therefore, the discharge of storm water contaminated with PFOS above the WQS is a violation of Part 31 of the NREPA, specifically Section 3109, and the Permit.

Additionally, a review of the file identified the following violations associated with the Discharge Monitoring Reports (DMR) up to the issuance date of this letter:

- The DMRs due in October 2019 and September 2020 were submitted late.
- Carbonaceous Biochemical Oxygen Demand (CBOD5) concentration exceedances were report on January 1, 2021, January 2, 2021, February 5, 2021, through February 9, 2021, and February 13, 2021, through February 17, 2021. Noncompliance notification reports were received for all occurrences as required by the permit.

The violations in this Violation Notice are continuing.

The Permittee shall take immediate action to achieve and maintain compliance with the terms and conditions of Part 31 and the Permit.

Bringing the unauthorized storm water discharge into compliance with the WQS for PFOS shall be accomplished expeditiously. Therefore, the WRD is offering to meet with the Permittee to discuss options to resolve the violations of discharging PFOS to the waters of the state above the WQS and to establish a plan to prevent future discharges of PFOS above the WQS.

By April 14, 2021, please contact me to schedule the meeting.

Please be aware, compliance with the requirements outlined in this Violation Notice does not constitute a release or waiver of liability for compliance with your Permit or Part 31.

We appreciate your prompt attention to this matter. Should you have any questions regarding this letter, please contact me at 616-250-6134; GrantR3@Michigan.gov; or at EGLE, WRD, GRDO, 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503-2341.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Grant". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ryan Grant, Environmental Quality Specialist
Water Resources Division –EGLE

rg/lr

cc: Ms. Michelle Baker, Gerald R Ford International Airport Authority (via email)
Ms. Stephanie Kammer, Mgr. Emerging Pollutant Section, WRD, EGLE (via email)
Mr. Brian Zuber, Emerging Pollutants Section, WRD, EGLE (via email)
Ms. Katelyn Wysocki, Enforcement Unit, WRD, EGLE (via email)
Mr. Michael J. Worm, GRDO Supervisor, WRD, EGLE (via email)