

SUMMARY OF SUBSTANTIVE UPDATES TO GLWA IPP RULES
November 2019 Version

Page Number	Action	Explanation
Page 3	Updated the definition of "Authorized Representative"	Clarification
Page 4	Added definition of "Chief Compliance Officer"	Clarification
Page 5	Deleted definition of "Dental Industrial User"	No longer applicable under new Regulations
Page 5	Updated definition of "Existing source"	Clarification
Page 6	Deleted definition of "Great Lakes Water Authority"	Definition is encompassed in Control Authority
Page 6	Deleted definition of "Great Lakes Water Authority (GLWA) Member Community"	Duplicative definitions found elsewhere (Preamble and page 7)
Page 5-6	Updated definition of "High Strength Wastewater"	Reflects EGLE's new regulatory limits
Page 6	Updated definition of "Industrial User"	Necessary for Rule consistency
Page 6	Added a definition of "Instantaneous Limit"	Clarification
Page 7	Deleted definition of "May"	Unnecessary
Page 7	Deleted definition of "Minor User"	Duplicative
Page 8	Deleted the definition of "Non-significant Categorical Industrial User"	Definition clarified on page 11
Page 8	Added definition of "PFAS Compounds"	Updated PFAS language required by EGLE
Page 8-9	Added language to definition of "POTW"	Definition clarification
Page 11	Deleted definition of "Users"	Updated more specific definition
Page 11	Added definition of "Users" or "Nondomestic User" or "Industrial User"	Definition clarification
Page 11	Updated the definition of "Waters"	Clarification
Page 13	Board authorizes the CEO as Control Authority (previously IWC Operations Manager)	Clarification
Page 18	Deleted GLWA Board adoption language	Clarified in definition of Control Authority
Page 19	Added language to Section 11-301 recognizing NPDES Permit	Clarification
Page 22	Added subsection (g) requiring immediate notification for slug discharges	Facility safety
Page 26	Updated Hazardous Waste Notification Procedure	Clarification

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Page 28	Added language regarding requesting a conference to discuss sample results	Aligns with new Appeal procedure
Page 33	Deleted language regarding Non-significant Categorical Industrial User	Deleted for consistency
Page 36	Deleted language referencing a Non-significant Categorical Industrial User or Dental Industrial User	Deleted for consistency with new rules
Page 43-44	Deleted language regarding periodic compliance reporting frequency	Updated section after consultation with customers and EGLE
Page 49-53	Added requirements for PFAS Compounds	New PFAS language required by EGLE
Page 53	Added language to Section 11-1101 Upsets	Reflects EGLE's new limits
Page 55-56	Added language clarifying "Significant Noncompliance Criteria" and updated numeric pretreatment standards	Updated language to reflect definition changes and CFR references
Pages 64-72	Added "** Signifies Domestic Strength Level"	Clarification
Page 89	Deleted language regarding analytical information	Updated to reflect EGLE's new structure
Page 85	Added and deleted language regarding 40 CFR 136	Updated CFR References
Page 87-88	Added language identifying an aggrieved party of the Appeal process	Previous Appeals section deleted and updated
Pages 92-111	Deleted the former Appeals Procedure	Previous Appeals section deleted and updated
Page 87-88	Added language consistent with the new Appeal Process	Updated to reflect new Appeal process
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The aforementioned changes resulted from comments submitted by Michigan EGLE, the Michigan Manufacturer's Association and the Detroit Regional Chamber, and the following:

BMY Environmental (Consultant)
 DTE Energy
 Edw. Levy Co.
 EES Coke
 Fitzgerald Finishing
 Butzel Long (Various Clients)
 Faygo
 Richard Powells PE
 Aactron
 MI Waste and Recycling Association

USS Steel
 Oakland County WRC
 MI National Association of Surface Finishers
 Waste Management
 Great Lakes Environmental Law Center & Sierra Club
 Environmental Legal Services
 Unistrut
 Don's Little Johns
 Republic Services