

From: [Tiffany Minder](#)
To: [Faith Finholm](#); rmontri@mannaismithgroup.com; [Christina Kelly](#); [Jonathon Mateen](#)
Cc: [Wesley Ulmer-Boyd](#)
Subject: Re: Procedure to Request a Groundwater Variance
Date: Wednesday, January 10, 2024 10:29:00 AM
Attachments: [TABLE 46-146 + PFAS 2024.xlsx](#)
[Discharge Prohibitions and Limits + PFAS -2024.docx](#)

Good Afternoon All -

Below are the follow-up items that I had from our call on Monday:

- I have attached the most current Discharge Prohibitions and Limits.doc and Table 46-146 which include PFOS. Thanks again to Ryan for noticing that I had sent an older version of these files which did not include that parameter.
- Current sewer use rate for discharging to the City is: \$4.344 per 100 ft³ (748 gallons)
- We had discussed if you could submit a single variance request to cover all of the properties
 - One Groundwater Discharge Variance request can be submitted to cover all of the properties as long as all the information for each of the properties is available and similar enough that one form can include all the comprehensive information.
 - If you do not have all of the addresses, estimated discharge dates, etc available when submitting the initial request, then multiple requests/forms should be submitted as that information becomes available to you. Each request could cover a group of properties for which you have enough information.
- We had also discussed if instead of testing the groundwater from each property if you could just analyze the groundwater from a random sampling of the properties and use that as representative data to have ground water variances approved for all of the properties. I have done some research and unfortunately that is not an option. We just don't know what was present in the basements of these structures (oil heaters, paint, solvents, fertilizers or other chemicals of concern) and how different the makeup of those potential pollutants is from one property to another. I am still asking around to see if I get any additional feedback, but as of now the directive would be that each property has to be sampled and tested individually.

Please let me know if you have any other questions or need any additional information from me.

Thanks,
Tiffany Minder
Environmental Compliance Supervisor
Environmental Compliance Unit
City of Flint WPCD
810-766-7210 x3634
tminder@CityofFlint.com



On Mon, Dec 11, 2023 at 10:04 AM Faith Finholm <ffinholm@thelandbank.org> wrote:

It does! Thank you very much for your response. I figured it was such, but wanted to be sure.

Be happy. Be well.

Faith C. Finholm

Grants Manager

Genesee County Land Bank Authority

810-257-3088 Ext. 539

From: Tiffany Minder <tminder@cityofflint.com>
Sent: Monday, December 11, 2023 9:58 AM
To: Faith Finholm <ffinholm@thelandbank.org>
Cc: Wesley Ulmer-Boyd <wboyd@thelandbank.org>; Christina Kelly <ckelly@thelandbank.org>; Jonathon Mateen <jmateen@thelandbank.org>
Subject: Re: Procedure to Request a Groundwater Variance

Good morning all -

Discharge of anything other than rainwater to storm drains is strictly prohibited under federal stormwater regulations.

Yes, rainwater can collect pollutants as it flows into the catch basins and storm drains. But, pollutants picked up by rainwater are beyond our control and also far less concerning than groundwater pollutants. Groundwater has a much higher potential to introduce pollutants of concern than does rainwater, and far easier for us to test and regulate:

- Because groundwater moves rather slowly, it allows for extended contact time with potential pollutants which leads to concentrated buildups.
- Groundwater often leaches minerals and heavy metals from the soil.

- If the groundwater is coming from basements or demolition sites we often see lead and asbestos contamination.
- It is becoming much more common for us to see groundwater samples contaminated with PFAS and PCBs.

Storm sewers run directly to surface waters with no treatment occurring. Sanitary sewers come to the wastewater treatment facility, but the facility is not designed to remove these types of contaminants. That is why, if approved, groundwater is sent to the sanitary sewer and not the storm sewer and why analytical is required to determine what is present in the groundwater and if pre-treatment is required before sending it to the treatment plant.

Hope that helps to clarify why groundwater is restricted from being discharged into storm sewers and why it has to be tested before being approved to be pumped into sanitary sewers. Please let me know if you have any more questions.

Thanks,

Tiffany Minder

Environmental Compliance Supervisor

Environmental Compliance Unit

City of Flint WPCD

810-766-7210 x3634

tminder@CityofFlint.com



On Fri, Dec 8, 2023 at 4:55 PM Faith Finholm <ffinholm@thelandbank.org> wrote:

Hi, Tiffany. Thank you for this information.

I did note that you discuss groundwater/surface water being disposed of in the sanitary.

What is the procedure/concerns/requirement regarding discharges to the storm? I mean, all the surface water that is collected on roads, parking lots, etc. is directed to the storm-correct? And what craziness does runoff from a parking lots and other abandoned and burned structures contain?

Your thoughts / direction on this would extremely appreciated.

Be happy. Be well.

Faith C. Finholm

Grants Manager

Genesee County Land Bank Authority

810-257-3088 Ext. 539

From: Jonathon Mateen <jmateen@thelandbank.org>
Sent: Tuesday, November 7, 2023 3:06 PM
To: Faith Finholm <ffinholm@thelandbank.org>; Christina Kelly <ckelly@thelandbank.org>
Cc: Wesley Ulmer-Boyd <wboyd@thelandbank.org>
Subject: FW: Procedure to Request a Groundwater Variance

From: Tiffany Minder <tminder@cityofflint.com>
Sent: Tuesday, November 7, 2023 2:41 PM

To: Jonathon Mateen <jmateen@thelandbank.org>
Subject: Procedure to Request a Groundwater Variance

Jonathan -

Because groundwater/surface water is a prohibited discharge to the sanitary sewer, a variance is required in order to pump it into the City of Flint's sanitary sewer. To request a variance you will need to do the following:

- Submit a Request to discharge into the sanitary sewer. The form is attached and the request should be submitted to me.
- Sample each discharge location and provide analytical results for the parameters specified in Table 46-146(c) of Discharge Prohibitions and Limits (attached below).
 - You can work with a contract lab to get this done or request for my team to collect the samples and run the analytical
 - You are responsible for the costs incurred for sampling and testing
- Provide the expected volume of ground/surface water to be discharged.
- Provide the expected duration of the discharge
- Contact the City of Flint's Customer Service to set up an account to pay for the discharge.
 - Tiffany Leppan (tleppan@cityofflint.com) from customer service can help you
 - I believe the groundwater remediation rate is around \$4.845/ccf

After I receive the variance request and estimated volume, I can determine the sanitary sewer manhole that the ground/surface water can be discharged to and the rate at which it can be discharged so that it does not surcharge the sewer line.

Once I'm provided with the analytical data, I will review and let you know if your variance request is approved and work with you to coordinate dates for discharge.

If you have any questions, feel free to contact me.

Thanks,

Tiffany Minder

Environmental Compliance Supervisor

Environmental Compliance Unit

City of Flint WPCD

810-766-7210 x3634

tminder@CityofFlint.com