

FY2026 CWSRF PROJECT PLAN PONTIAC SANITARY DISPOSAL SYSTEM SEWER REPLACEMENT PROGRAM

FOR OFFICE OF THE OAKLAND COUNTY WATER RESOURCES COMMISSIONER



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Appendix B – EGLE Submittable Forms
Resolution and Project Plan Submittal Form – <i>to be completed and provided in final</i>
Project Useful Life and Cost Analysis Certification -- <i>to be completed and provided in final</i>
Project Priority List Scoring Data Form -- <i>to be completed and provided in final</i>
Appendix C – Project Planning Public Meeting
Notice of Public Meeting
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<i>(To be completed and provided in final.)</i>
Appendix E – EGLE Pipe Structural Integrity Worksheet and Asset Data
Appendix G – Consent Judgement

SECTION 1.0 — SUMMARY AND RECOMMENDATION

1.1 SUMMARY

This FY2026 Project Plan for the City of Pontiac Sewage Disposal System (POCSDS) Sewer Replacement Program has been prepared using the Project Plan Preparation Guidance of the Clean Water State Revolving Fund (CWSRF) Administrative Rules updated in January of 2023. While the proposed financing rates in the CWSRF program have not been set yet for FY2026, the rates in FY2025 were 2.5% and 2.75% for 20-year loans and 30-year loans, respectively, and 2.00% for applicants deemed “Overburdened.” These rules call for compliance with the basic Federal Planning Requirements and the National Environmental Policy Act (NEPA). This Project Plan will serve as a basis for project prioritization and must be submitted to the Michigan Department of Environment, Great Lakes, & Energy (EGLE) by May 1, 2025, in order to be on the project priority list for the fiscal year of 2026.

The proposed projects listed herein as part of the CWSRF Project Plan are to address National Association of Sewer Service Companies (NASSCO) Pipeline Assessment Certification Program (PACP) and Manhole Assessment Certification Program (MACP) structurally rated Level 4 and 5 defects that were found in pipes and structures in the sanitary sewerage system. These structural repairs and rehabilitations are anticipated to have an additional benefit of reducing Inflow and Infiltration (I/I) from the POCSDS into the Clinton River Water Resource Recovery Facility (CRWRRF,) which are currently under a Consent Judgement with the State to reduce wet weather flows and/or build a sewage retention basin.

While the system received a grant through the “American Recovery Plan” (ARP) that provided 100% funding for the \$12,750,000 of work proposed in the FY2023 CWSRF Project Plan and a combination of financing in FY2024 in the amount of \$7,250,000, the Oakland County Water Resources Commissioner (OCWRC) is pursuing additional financing through a low interest loan and/or additional grant financing to continue with addressing the backlog of sewerage system defects identified in the POCSDS.

1.2 CONCLUSIONS

The proposed project, which was found to be most technically feasible, cost-effective, and environmentally preferred of the five alternatives reviewed, includes the following:

- ≡ Replacement of existing sanitary sewer pipes to address NASSCO PACP Level 4 and 5 structural defects that have been identified, in order to reduce overall risk to the system, with the secondary benefit of reducing the Inflow and Infiltration of clear water into the collection system and delivered to the Clinton River Water Resource Recovery Facility (CRWRRF.)
- ≡ While previous projects focused on sanitary sewer pipe and structure rehabilitation, typically through structural lining, these pipes were found to have defects that likely cannot be rehabilitated. Therefore, complete replacement of the pipe using open cut excavation is required.

1.3 RECOMMENDATIONS

The following recommendations are therefore made:

- ≡ The OCWRC, which owns and operates the Pontiac Sewage Disposal System, should pass the resolution formally adopting this Plan and identifying an authorized representative.
- ≡ OCWRC should apply for a low-interest loan under the CWSRF program and submit an overburdened community form to potentially be eligible for grant funding or principal forgiveness.

2.2 POPULATION

According to Southeast Michigan Council of Governments (SEMCOG), population projections for the next 20 years in both the city of Pontiac and Sylvan Lake show slight increases. Both had a peak population in the 1970s and showed declines after that until recently. The U.S. 2020 Census Bureau data estimated the average household size in the County at 2.3 people per household. The population projections for the cities of Pontiac and Sylvan Lake are shown in the following figures taken from SEMCOG projections (<https://semcog.org/population-estimates>):

Figure 2 – Population Projection, City of Pontiac

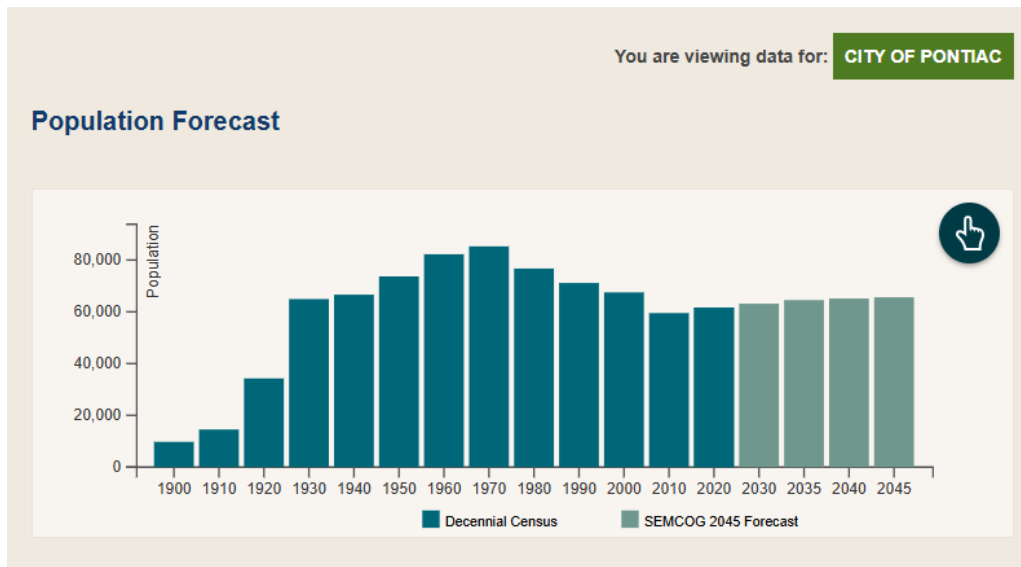
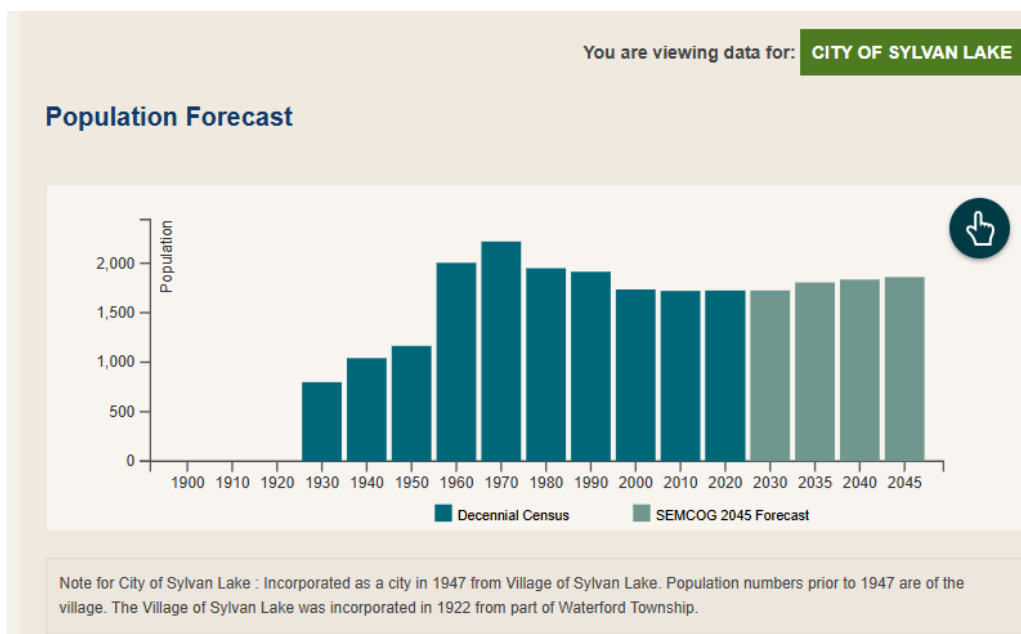


Figure 3 – Population Projection, City of Sylvan Lake



2.3 EXISTING ENVIRONMENT EVALUATION

2.3.1 Air Quality

In general, air quality in Oakland County is in compliance with all applicable standards. This project, and the alternatives discussed will have no impact on the quality of the air in the Project Area.

No impacts on the NESHAP or Natural Resources and Environmental Protection Act (NREPA) regulations are anticipated. However, if encountered prior to or during the design and construction phases all hazardous wastes, liquid industrial by-products, solid wastes (including contaminated soils), building materials containing asbestos shall be managed accordingly and disposed of properly.

2.3.2 Wetlands

The National Wetlands Inventory (NWI) and Michigan Resource Information System (MIRIS) Land Cover maps were consulted to look for any possible wetlands in the Study Area. While there are some wetlands within the POCSDS, they are typically located near surface waters and in park areas. The proposed work will be located mainly within roadway rights-of-way or on private property to replace existing sanitary sewer pipes, and no impacts to any existing wetland areas are expected. However, for final design, any wetlands that may be impacted would be flagged, applications for the appropriate permits will be submitted and necessary mitigation measures will be undertaken to protect the influenced wetlands.

2.3.3 Great Lakes Shorelands, Coastal Zones, and Coastal Management Areas

There are no coastal zones located with the Project Area and therefore no impacts are anticipated.

2.3.4 Floodplains

There are various floodplains located within the Study Area based on the Flood Insurance Rate Maps (FIRM) on the Federal Emergency Management Agency (FEMA) website. However, the proposed work will be located mainly within roadway rights-of-way or on private property and no impacts to any identified floodplains are expected.

However, if isolated excavations must be located within the 100-year floodplain, construction will only be undertaken after first contacting EGLE and obtaining the appropriate permits. Appropriate mitigation measures and soil erosion efforts will be undertaken to protect the floodplains influenced by the project, including but not limited to silt fences, turbidity curtains, stone check dams, gravel access drives, rip-rap, etc. Additionally, excavations will be filled with appropriate backfill materials, compacted and restored to existing grade with surface restoration matching existing vegetation.

2.3.5 Natural or Wild and Scenic Rivers

According to the National Wild and Scenic Rivers System and the Nationwide Rivers Inventory on the National Park Service Website, the Clinton River is the only river or tributary located within the project limits. However, the Nationwide Rivers Inventory indicates that the segment of the Clinton River located within the City of Pontiac is not considered a federal-designated river segment, as only the Clinton River from the mouth at Lake St. Clair to Lake Orion is the federal-designated segment. The Michigan Designated Natural Rivers Map from the Michigan Department of Natural Resources Website shows that there are no state-designated rivers within the project limits. Therefore, this proposed project should not interface with or impact the portion of the Clinton River that is considered a state-designated segment.

2.3.6 Major Surface Waters

The City of Pontiac has various inland lakes and ponds throughout the city limits including Crystal Lake, Spring Lake, Harris Lake, Terry Lake, Osmun Lake, Galloway Lake, Upper Silver Lake, Dawsons Millpond and Hadsells Pond. These waterways are tributaries for the Clinton River which enters Lake St. Clair, some waterways are located within parks and golf courses which allows the public access to the waterway, while other waterways are surrounded by residential areas with only private access to the waterway. While various inland waterways are present throughout the City, the proposed work will be located mainly within roadway rights-of-way, on private property and will have no impact on any existing major surface waters.

Drinking water in the City is purchased from the North Oakland County Water Authority (NOCWA), which purchases it from the Great Lakes Water Authority (GLWA). The water comes from the Lake Huron watershed via the Lake Huron Water Treatment Plant in Port Huron.

2.3.7 Topography

The terrain within the Study Area is characterized by a sloped topography generally decreasing from west to east and ranging from 1,090 to 860 feet.

2.3.8 Geology

The City of Pontiac and surrounding area is typified by Coldwater Shale bedrock, overlain by a thin layer of unconsolidated glacial deposits. The sedimentary strata were deposited during the Mississippian period in the Michigan Basin (360 to 325 million years old); just above or below sea level. The sedimentary deposits consist primarily of sand and gravel.

2.3.9 Soil Types

According to the United States Department of Agriculture (USDA) online Web Soil Survey, the project area consists of a variety of different types of soils, the most common types of soil are: Urban, Aquents, Udorthents, Marlette, Houghton & Adrian mucks and Glynwood.

2.3.10 Agricultural Resources

There is no agricultural land located within the city limits. Therefore, no City agricultural resources will be impacted by the proposed work.

2.3.11 Fauna and Flora

Since the construction will be made within the existing right-of-way in previously developed areas, there is anticipated to be little to no impact to existing fauna and flora. The existing roadway trees that are located between the street and sidewalk will be protected to the maximum extent possible, but there may be some isolated impacts to some trees.

2.3.12 Climate

The project area's climate is controlled by its location with respect to major storm tracks that pass through the Midwest and by the influence of the Great Lakes. Summers in the Detroit metropolitan area are warm and sunny. Showers usually occur every few days but often fall on only part of the Metropolitan Detroit area. Extended periods of drought are unusual. The growing season averages 180 days in length and historically has ranged from 145 days to 205 days. The average date of the last freezing is April 23; average date of the first freezing temperature

is October 21. Climatological data is collected by the National Oceanic and Atmospheric Administration (NOAA) at Detroit Metropolitan Wayne County Airport.

The proposed project, and the alternatives discussed, will have no impact on the climate of the project area.

2.3.13 Existing Environmental Contaminants

EGLE's Environmental Contaminants online mapper was used to determine that no known contaminants are anticipated to be located within the project areas. However, if encountered prior to or during the design and construction phases, EGLE will be notified immediately and all environmental contaminants shall be managed accordingly.

2.3.14 Cultural and Historic Resources

There are no anticipated impacts on archaeological, tribal, historical, or cultural resources as a result of this project. All proposed work will be performed within existing rights-of-way in previously developed areas to replace existing sewers. All areas impacted by the temporary construction will be restored to the previous condition as part of the proposed project.

2.4 EXISTING SYSTEM

The POCSDS infrastructure consists of critical assets for conveying sanitary sewerage from residential, commercial, and industrial uses to be treated at the CRWRRF. A description of the wastewater infrastructure is provided in the following sections.

2.4.1 Sewage Disposal System Background

The POCSDS was originally constructed starting in the 1920's, with significant portions of the system as a combined sewer system. In the 1970s, the combined sewers were separated. Today, the POCSDS assets include approximately 272 miles of sanitary sewers ranging between 4-inch and 78-inch diameter pipes and about 6,200 manhole structures. The POCSDS includes 11 lift stations. While not part of the POCSDS, all wastewater collected and transported by the POCSDS receives treatment at the CRWRRF wastewater treatment facilities.

The POCSDS has a comprehensive Asset Management Plan where the condition assessment data collected during CCTV inspection of pipes and inspection or scans of manholes is compiled within various databases and software programs. This data is used to determine assets that require intervention, and then each asset is reviewed to determine the best approach. Projects that require capital investment into an asset—where an asset is replaced in kind or rehabilitated to have another 20 or more years of useful life—are typically grouped together into larger construction projects. In addition to these capital projects, such as the rehabilitation work performed as part of the FY2023 and FY2024 SRF projects, there are additional point repairs, dig-ups, pipe patches, and ongoing maintenance performed in the POCSDS were feasible and cost effective.

2.4.2 Previous Studies

Starting in the early 2000s, the POCSDS has studied and attempted to reduce wet weather inflow and infiltration into the sanitary system through a series of efforts, including the following:

- ≡ 2003 Flow Monitoring Program documented in a report dated October 2004
- ≡ Enhanced System Evaluation Survey documented in a report dated August 30, 2009
- ≡ Sewer System Rehabilitation (Consent Judgment Phase I) Basis of Design documented in a report dated November 1, 2009

- ≡ City of Pontiac Project Performance Certification (PPC) documented in a report dated December 1, 2014, which includes a summary of the earlier studies. The 2014 PPC report supports two main conclusions:
 - The sewer system rehabilitation completed between the 2003 flow monitoring and the PPC period was effective in reducing the peak flow rate from POCSDS by at least 19 million gallons per day (MGD).
 - The wet weather peak flow rate from the POCSDS was still greater than the treatment capacity of the downstream CRWRRF. A future condition, wet weather peak volume greater than the treatment capacity of 10.9 MG was identified.

2.4.3 Inflow and Infiltration Reduction Projects

POCSDS and EGLE recognized that the wet weather volume generated within the POCSDS remained significant and that the data showed potential for additional reductions in wet weather flow rates. POCSDS was provided with relief from the schedule outlined in the Consent Judgement to continue to study and address its wet weather inflow and infiltration instead of initiating design and construction of a large volume storage facility. The CRWRRF has also been upgraded significantly in recent years and its capacity, an important part of addressing the POCSDS wet weather peak flow rates, has been increased. Since 2015, POCSDS and CRWRRF have completed the following efforts:

- ≡ Pontiac SDS: Inflow and Infiltration Analysis using Mass Flow Monitoring documented in a report dated June 2018. This document presented a study of 27 small service areas through POCSDS. This study presents flow rates for each of these areas and identifies areas where inflow and infiltration efforts are expected to be effective.
- ≡ The Sanitary Sewer System Evaluation Survey for City of Pontiac, documented in a report dated June 2019, provides the details of the Sanitary Sewer System Evaluation Survey, which focused on those areas of the POCSDS that were identified in the June 2018 Mass Flow Monitoring report as having high inflow and infiltration. This report identified rehabilitation recommendations that have been included in the POCSDS maintenance efforts since the report was issued. POCSDS continues to address some long-range recommendations of this report. The maintenance activities identified have clearly addressed some sources of inflow and infiltration at these locations. However, significant inflow and infiltration remains in the POCSDS.
- ≡ CRWRRF Operation Optimization Plan documented in a technical memorandum dated November 30, 2020. This plan identified projects at the CRWRRF that would increase the capacity from the existing 30.6 MGD to 40 MGD. While these projects relate to the CRWRRF, which is a separate financial and municipal entity from the POCSDS, additional CRWRRF capacity is an important part of addressing the wet weather peak from the POCSDS. Implementation of the recommendations in this memorandum is still being planned. If a storage solution is selected for the POCSDS wet weather peak flow rate, the volume of storage needed will be directly linked to the treatment capacity of the CRWRRF.
- ≡ The Asset Management Plan documented in the Oakland County Pontiac WWTF and Sewer System Annual Reports from 2018 through 2022. These reports present activities and plans for both the CRWRRF and the POCSDS. For the purposes of this Project Plan, the POCSDS portion of the reports has been focused upon. These reports show that the POCSDS has invested significant effort in identifying and addressing maintenance needs and has plans to continue to make significant investment in the POCSDS. The completed maintenance work includes some of the maintenance needs identified in the Sanitary Sewer System Evaluation Survey (SSES).

2.5 WORK COMPLETED SINCE LAST PROJECT PLAN

The POCSDS sewer rehabilitation projects that were the selected alternatives from the FY2023 Project Plan and FY2024 Project Plan Amendment are either complete or currently under construction with all projects scheduled to be completed by end of the fall of 2025. These projects generally included trenchless rehabilitation of sanitary sewers using Cured-in-Place Pipe (CIPP) lining and structural manhole lining, with some sanitary sewer pipes and manholes being replaced entirely where road and/or water main projects were occurring.

2.6 NEED FOR PROJECT

Even after the FY2023 and FY2024 sewer and manhole rehabilitation projects are complete, there will still be a significant amount of sewer assets in the POCSDS that have PACP and/or MACP Level 4 and 5 structural defects. The need for this project is the same as stated in the FY2023 and FY2024 Project Plans—there is a significant number of sanitary sewer pipes and manholes that have severe structural defects, which if not addressed, will result in Sanitary Sewer Overflows (SSOs), basement backups, and/or sinkholes. SSOs and basement backups are a threat to public health and to surface water quality. Sinkholes may result in structural damage to other infrastructure, such as roads, watermains, and gas lines, or may even result in structural failure of adjacent buildings and homes.

This FY2026 Project Plan includes work to replace sewer pipes (and, some adjoining manhole structures) that have defects that could not be corrected with CIPP lining rehabilitation and instead require replacement of the sanitary sewer pipes and adjacent structures through traditional open cut excavation. These types of defects include sags (where the pipe has settled or deflected so that it is no longer aligned to allow for gravity flow), holes, offset joints, collapses, etc.

A secondary need for a project is that the POCSDS is predicted to generate wastewater more than the CRWRRF capacity for the 25-year, 24-hour growing season design event that is described in the Consent Judgement, a copy of which is included in Appendix G. The proposed structural rehabilitation and replacement of the sanitary sewer pipes and structures will have a secondary benefit of reducing the inflow and infiltration into the system and that are conveyed to the CRWRRF, thus reducing the need and/or sizing of any future wet weather storage facilities.

2.7 PROJECTED FUTURE NEEDS

Since the population of the Study Area generally peaked in the 1970s and declined after that, and the area is already almost entirely developed, it is unlikely that the sanitary sewer system will require additional capacity in the future. There are currently redevelopment projects ongoing in the city of Pontiac, but to date, no additional capacity needs have been identified for the overall system.

SECTION 3.0 — ALTERNATIVE ANALYSIS & SELECTED ALTERNATIVE

3.1 ALTERNATIVE ANALYSIS

This Project Plan includes a review of the following alternatives to address the structurally deficient sanitary sewers:

- ≡ Alternative 1 – No Action
- ≡ Alternative 2 – Optimize Performance of Existing System
- ≡ Alternative 3 – Regionalization
- ≡ Alternative 4 – Sewer Rehabilitation
- ≡ Alternative 5 – Targeted Sewer Replacement

3.1.1 Alternative 1 – No Action

If no action is taken within the POCSDS the sanitary sewer pipes and manholes that have severe structural defects could fail and result in Sanitary Sewer Overflows (SSOs), basement backups, and/or sinkholes. SSOs and basement backups are a threat to public health and to surface water quality. Sinkholes may result in structural damage to other infrastructure, such as roads, watermains, and gas lines, or may even result in structural failure of adjacent buildings and homes.

A secondary impact would be the ongoing wet weather inflow and infiltration that enters the system through structural defects, which could result in continuing to exceed the capacity of the CRWRRF, and the Consent Judgement will not be satisfied. Therefore, “No Action” is not a viable alternative.

3.1.2 Alternative 2 – Optimize Performance of Existing System

The proposed replacement of the existing, failing sewers is optimizing the existing system. The system cannot currently operate to its design standard due to the types of defects present in the sewers. Replacing the sewers will restore the capacity and operability of the system. The types of defects present in these specific sewers, cannot be rehabilitated using trenchless technologies.

3.1.3 Alternative 3 – Regionalization

There are no readily available regional solutions, other than continued coordination with the CRWRRF system. The neighboring Clinton Oakland Sewage Disposal System and Evergreen-Farmington Sanitary Drain Drainage District do not have excess capacity that can be provided to POCSDS. Regionalization beyond these systems would require transport distances that are cost prohibitive, pipe construction routes that are disruptive to communities that would see no benefit and may not be technically or administratively viable. Thus, there are no regional alternatives to be evaluated.

3.1.4 Alternative 4 – Sewer Rehabilitation

Rehabilitation was considered but these specific sewer pipes were determined that they could not be successfully rehabilitated using CIPP lining or other methods due to the types of defects present, such as sags (sewers that have settled into the ground), holes and fractures.

3.1.5 Alternative 5 – Targeted Sewer Replacement

As discussed previously, the POCSDS has initiated and/or completed several projects to rehabilitate the existing sanitary sewer pipes and associated structures using trenchless rehabilitation techniques where it was cost

effective and feasible to do so. However, there were additional sanitary sewer pipes identified to have defects that could not be rehabilitated using these trenchless techniques. These segments have been reviewed and determined that open cut excavation to replace the entire pipe segment would be the most feasible and cost-effective approach for correcting the defects.

Rehabilitation was considered but these specific sewer pipes were determined that they could not be successfully rehabilitated using CIPP lining or other methods due to the types of defects present, such as sags (sewers that have settled into the ground), holes and fractures.

Proposed Scope of Work

The replacement of each segment of sanitary sewer pipe, as shown on Figure 4 – Alternative #5, Proposed Project Map, will typically include the scope of work described below. At this planning stage, a contingency of 20% has been provided in consideration of work that will be further investigated and developed during the design phase of the project.

- ≡ Replacement of the existing sanitary sewer pipe from manhole to manhole, using OCWRC typical sanitary sewer details for construction.
- ≡ Replacement of the up and/or downstream manholes for a given sewer segment, as needed, which may be required for the following reasons:
 - If existing manholes are found to have existing structural defects (NASSCO MACP Level 4 or 5 structural defects,) which could cause failure of the manhole or impact operation of the sanitary sewer.
 - If existing manholes are located in an area that does not allow for proper access for maintenance of the new sanitary sewer.
 - If new manholes need to be provided for constructability issues, such as being able to maintain service to customers during construction.
- ≡ Reinstatement of sanitary lateral leads into the new sanitary sewer. In the POCSDS, the sanitary sewer leads are the property of the resident or company that owns the parcel being serviced, but connection of the existing lead to the new sanitary sewer may involve some limited re-routing and/or reconstruction due to the new sewer's location and/or impacts of the construction. We anticipate this work would generally be limited to the limits of the existing sanitary sewer easement or existing rights-of-way and no work on private property is proposed at this time.
- ≡ Support and/or limited replacement of other utilities, such as water main or storm sewer, that would be impacted by the construction of the new sanitary sewer.
 - The OCWRC also owns, operates and maintains the water main distribution system within the city of Pontiac. The city of Pontiac owns, operates and maintains the stormwater sewer system and the roadways. All sanitary sewer work will be coordinated with these entities.
 - Gas, electric and other private utilities located within the trench excavation limits for the sanitary sewer would be coordinated with those utilities, but there may be fees or costs associated with the required support, replacement or relocation work performed by those entities (such as power pole support or gas line relocation, etc.)
 - We understand only utilities within the trench limits for the new sanitary sewer replacement construction are eligible for funding through the CWSRF. Any utility work coordinated as part of a "dig one" approach outside these limits would be funded through other sources.
- ≡ Restoration of the surface to the existing condition, which may include limited landscaping, sidewalk, curb, and/or road work. Again, we understand only surfaces directly impacted by the construction work associated

with the sanitary sewer replacement are eligible. Any additional work on roadways, etc. outside of the trench limits made as part of coordination to reduce construction impacts to the public would be paid through outside funding sources.

3.2 MONETARY EVALUATION

A preliminary cost estimate was prepared only for Alternative No. 5, Targeted Sewer Replacement, because it was found to be the only feasible option. All the work will be completed within the rights-of-way or existing sewer easements. Any new easements that are necessary for construction will be temporary.

The present worth of the construction cost within the project period of 20 years is determined by using the formula provided below:

Table 1—Summary of Monetary Evaluation

	Alt. 5: Targeted Replacement of Existing Sanitary Sewers and Structures
Capital Costs	\$19,400,000
Annual OM&R Costs	\$0
20 Year Salvage Value	\$8,967,000
Net Present Worth	\$10,433,000
Annual Equivalent Present Worth	\$650,400

AVERAGE WEIGHTED USEFUL LIFE OF ALT #5:

70.0 YEARS

Notes:

Net Present Worth is the sum of capital costs, OM&R costs less 20 year salvage value.

Present Worth Costs are based on Straight Line Depreciation and no inflation.

2025 EPA Planning Discount rate = 2.2%

3.3 ENVIRONMENTAL EVALUATION

The only viable alternative is Targeted Sewer Replacement and the overall environmental impact is limited to temporary impacts caused by the proposed construction work. The POCSDS previously used trenchless technologies of construction, where applicable, to reduce any potential environmental impacts from open-cut excavation, but the sewers included in this report are unable to be rehabilitated using trenchless methods.

Any potential temporary environmental impacts due to construction, as discussed later in this Plan, would be mitigated by compliance with permits and local ordinances that are design to reduce the impacts of construction projects on the public and environment.

3.4 SELECTED ALTERNATIVE 5 – TARGETED SEWER REPLACEMENT

The present-worth analysis found that the work proposed as part of Alternative 5, Targeted Sewer Replacement was the only viable alternative.

3.4.1 Design Parameters

The proposed project includes the replacement of existing sanitary sewers pipes within the POCSDS that have been inspected and found to have defects that have increase the likelihood of failure of the assets and, coupled with the potential consequence of failure, have been identified as having an unacceptable level of risk. These sewers were also not suitable candidates for CIPP rehabilitation due to the nature of the defects found.

Detailed data on the actual sanitary sewer pipes and manholes proposed to be replaced as part of the FY2026 Project Plan work have been included in Appendix E. The data was reported from WRC's asset management and GIS software and includes the recorded NASSCO PACP and MACP structural scores to demonstrate the eligibility of the assets (level 4 and 5 structural defects), along with other requested data. None of the pipes or structures included in this report for the proposed FY2025 project were included in the FY2023 or FY2024 rehabilitation projects.

3.4.2 Useful Life

As indicated by the CWSRF guidance document, the salvage value has been calculated based on in-place construction cost with straight-line depreciation over the estimated design life. For newly constructed pipelines, a design life of 70 years has been used in accordance with the POCSDS's Asset Management plan assumptions for sanitary sewers of this size and type.

Appendix A details the present worth analysis taking into consideration construction costs and salvage value, using the Environmental Protection Agency (EPA) real discount rate published in October of 2024. The present-worth analysis was made for a period of 20 years. Operation and Maintenance costs associated with the new sewer pipes (which generally only includes periodic cleaning and inspection) are not included as the existing O&M costs are anticipated to be the same as the proposed and therefore result in no additional cost to the system.

3.4.3 Water and Energy Efficiency

The construction involved with this project is limited to previously disturbed areas where the sanitary sewer system already exists. All of the proposed sanitary sewers flow by gravity and therefore there is no energy consumed and no water is used in operation of the system, other than periodic cleaning of the sewers.

3.4.4 Schedule for Design and Construction

These projects will be coordinated with other City utility projects when applicable. **Error! Reference source not found.** provides a proposed fiscal year 2026, quarter four loan closing schedule for the project.

Table 2-- Proposed Design and Construction Schedule

Engineering Service	FY2026 Q4 Timeframe	
POCSDS Targeted Sewer Replacement	Design	Feb 2026 – Jun 2026
	Construction Start	Aug 2026
	Construction End	May 2027

3.4.5 Cost Summary

The estimated total project cost for the proposed FY2026 project is approximately \$19,400,000.00

This is a planning-level estimate of costs made using recent project costs to perform similar work and engineering judgement based on the proposed work sites and sewer pipe locations.

3.4.6 User Costs and Cost Sharing

The costs as described above will be paid for by user charges through sewer utility bills. The table below shows the anticipated cost for this project spread over the 20-year loan period. In summary, the anticipated impact to the average consumer household would be an approximate cost of **\$2.96 per month**. This cost does not reflect the possibility of obtaining additional principal forgiveness and/or grant funding, if still available, which would lower the monthly cost to residents.

Table 3 – User Cost Summary

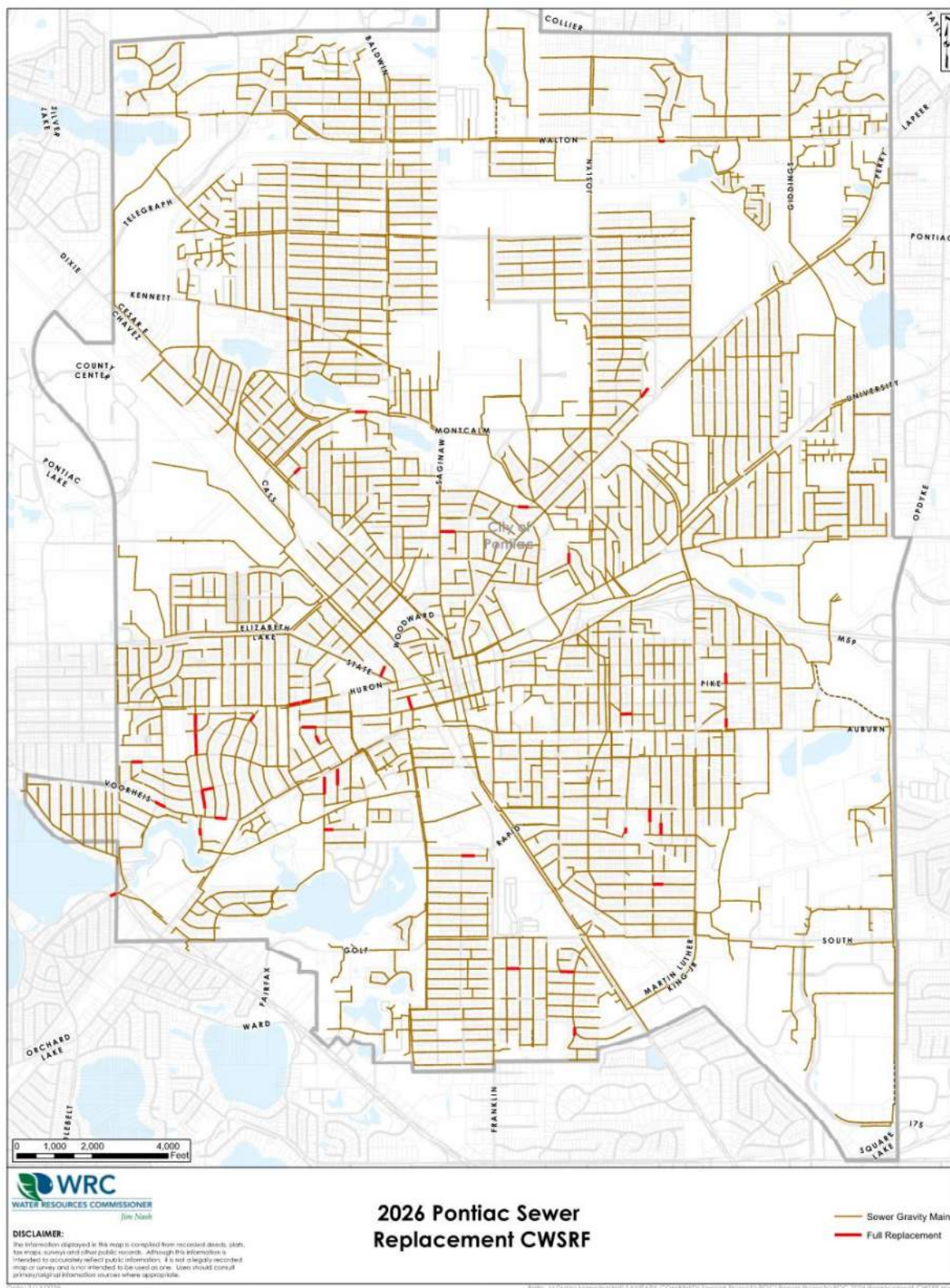
FY2026 PONTIAC SDS CWSRF		
Total Capital & Annual O&M Costs, Alternative 5:	<u>Total Capital Cost:</u>	<u>Total REUs:</u>
	\$19,400,000	27,290
ESTIMATED MONTHLY USER COST: (With no principal forgiveness/grant)	<u>20 Year Loan</u> \$2.96	

3.4.7 Implementability

The office of the Oakland County Water Resources Commissioner (OCWRC) owns, operates and maintains the POCSDS through an Act 341 agreement. OCWRC has the legal authority, managerial capability, and financial means to build, operate, and maintain the proposed improvements that would be funded through the collection of sewer utility bills.

3.4.8 Project Map

Figure 4 – Alternative #5, Proposed Project Map



SECTION 4.0 — ENVIRONMENTAL AND PUBLIC HEALTH IMPACTS

4.1 DIRECT IMPACTS

In general, the short and long-term impacts are anticipated to be minor, mainly related to the temporary disruption associated with construction. These include increased traffic, potential temporary road closures, and dust, etc. These impacts will be mitigated by working within the City's required construction ordinances, obtaining all required permits (soil erosion, sewer permits and right-of-way permits), and minimizing dust and soil erosion through proper controls and permitting.

The work will all take place on existing sanitary sewer assets that were constructed and are generally located in roadway rights-of-way and/or existing utility easements. Temporary easements may be required for construction, but there will be no impact to the aesthetic setting of any sites and all areas impacted by construction will be restored to the existing conditions.

The WRC also maintains a comprehensive asset management program, which will be updated and used to ensure that all assets associated with this project will have the fiscal resources to sustain their operation into the future.

4.1.1 Construction Impacts

Construction activities associated with the proposed improvements will take place on existing facilities. The environmental impacts for the selected alternative are therefore expected to be minimal to none. All elements of improvement efforts in this project aim to have the least impact possible on the community and environment. No long-lasting negative impacts are expected for any alternative. Implementation of the Project Plan would create temporary disruption to near-by residents/businesses and customers due to required construction. This includes noise and dust generated by the work and possible erosion of spoils from open excavation. However, there will be no major disruptions to the service connections.

The proposed sewer replacements will all take place within the existing rights-of-way. Existing roadway trees, those located between the road and sidewalk, will be protected as much as possible. But it is likely there will be some trees that may be impacted as a result of the construction activities. No registered contamination sites, wetlands and/or floodplains were found within the proposed construction sites using available resources.

4.1.2 Operational Impacts

The proposed project will improve the operational efficiency of the POCSDS and lower future O&M costs by removing pipes that must currently be frequently cleaned, removing existing blockages and sags, and having the secondary benefit of removing clear water that enters the system as inflow and infiltration through the existing structural defects.

4.2 INDIRECT IMPACTS

There are no changes anticipated to the rate, density, or type of residential, commercial, or industrial development in the Study Area as a result of this project. The existing structurally-deficient sewers will be replaced in-kind. The proposed projects are being coordinated with other infrastructure improvements, to the extent practical, such as water main and lead service lead replacements, storm sewer improvements and roadway improvement projects to reduce the cumulative construction impact of these projects on the public.

4.3 CUMULATIVE IMPACTS

There are limited cumulative impacts anticipated as a result of the proposed project. Siltation may occur during the construction phase of the project. Proper soil erosion and sedimentation control practices will be followed to reduce the impacts of siltation on surrounding areas.

No water quality impacts from direct discharges and non-point sources are anticipated, and the proposed project will reduce the potential for sanitary sewer overflows and backups caused by failing sanitary sewers.

4.4 MITIGATION

4.4.1 Short-Term Impact Mitigation

The short-term adverse impacts associated with construction activities would be minimal, and mitigatable, in comparison to the resulting long-term beneficial impacts. Impacts from the POCSDS improvements include dewatering during replacement of pipes and temporary damage to surface vegetation. Temporary dewatering would slightly lower the groundwater table in the improvement area if required, but there are few to no residential drinking water wells in the area. All restoration required post-rehab/replacement should return the impacted area to existing conditions. Short-term impacts for customers and residents include traffic disruption, dust, and noise. No long-term negative impacts are anticipated.

Some temporary environmental disruption will occur during construction, but these will be mitigated by project requirements established for cover vegetation removal, dust control, traffic control and accident prevention. Once construction is completed those short-term effects will stop and the area will be returned to the original conditions.

The soil erosion impact would be mitigated through the contractor's required compliance with a program for control of soil erosion and sedimentation as specified in Part 91 of Michigan Act 451, P.A. of 1994. The use of soil erosion and sedimentation controls (i.e., straw bales, sedimentation basins, catch basin inserts, silt fencing, etc.) will be properly implemented when necessary.

Careful considerations will be taken during the construction planning process to ensure that the system remains in service while the improvements are underway. Notifications will be provided to residents to make them aware of the construction and potential impacts. All access roads will be swept as necessary to avoid tracking sediment onto public roads.

4.4.2 Long-Term Impact Mitigation

There are no negative long-term impacts anticipated as a result of the project. The proposed project will improve the operational efficiency of the POCSDS and lower future O&M costs for both the collection system and the CRWRRF.

4.4.3 Indirect Impact Mitigation

The Study Area has been almost entirely developed already and the project includes only replacement of existing assets in kind, so no indirect impacts anticipated as a result of the project

SECTION 5.0 — PUBLIC PARTICIPATION

5.1 PUBLIC MEETING AND ADVERTISEMENT

A Public Meeting is scheduled for Tuesday, April 8, 2025 at 4:00 pm, and will be advertised on Oakland County's website for public meeting information starting no later than Monday, March 24, 2025. The notice includes instructions for the public to submit comments and/or for attending the meeting online or in person. The notice also provides a link to a PDF of the draft Project Plan and indicated that a hard copy was available for review at the location below. A copy of the public notice is included in Appendix C.

≡ WRC Office: One Public Works Building #95W, Waterford Twp, MI 48328

5.2 PUBLIC MEETING SUMMARY

To be completed after the meeting.

5.3 ADOPTION OF THE PROJECT PLANNING DOCUMENT

A resolution adopting the Project Plan will be presented to WRC for approval along with the submittal form, and other forms required, which are to be signed by the designated authorized representative.

5.4 EGLE SUBMITTAL FORMS

Required forms that will be provided in the final version of this Project Plan includes the following:

- ≡ EGLE's signed Project Plan Submittal Form
- ≡ The signed Project Useful Life and Cost Analysis Certification Form
- ≡ The Project Priority List (PPL) Scoring Data Form

5.4.1 OVERBURDENED STATUS FORM

An application will also be made to designate the POCSDS as an overburdened community using EGLE's form.

SECTION 6.0 — TECHNICAL CONSIDERATIONS

6.1 INFLOW AND INFILTRATION

Significant portions of the POCSDS consist of clay-pipe sewers that are estimated to be 75 years old or more, and that experience significant levels of Inflow and Infiltration (I/I). During substantial wet weather events, total system flow rates can exceed the treatment capacity of the CRWRRF. Even though the system includes a 3.5 million-gallon (MG) equalization basin, the CRWRRF must sometimes discharge partially treated wastewater to surface waters during these wet weather events. Due to the history of partially treated wastewater discharges, the city of Pontiac and EGLE entered into a Consent Judgment in 2009 with specific actions to be taken to minimize the likelihood of future discharges. The WRC now has responsibility for the requirements of the Consent Judgment.

6.2 SEWER SYSTEM EVALUATION SURVEY

A Sanitary Sewer System Evaluation Survey for City of Pontiac documented in a report dated June 2019, which has been previously provided to EGLE. This document provides the details of the Sanitary Sewer System Evaluation Survey, which focused on those areas of the POCSDS that were identified in the June 2018 Mass Flow Monitoring report as having high inflow and infiltration. This report identified rehabilitation recommendations that have been included in the POCSDS maintenance efforts since the report was issued. POCSDS continues to address some long-range recommendations of this report. The maintenance activities identified have clearly addressed some sources of inflow and infiltration at these locations. However, significant inflow and infiltration remains in the POCSDS.

6.3 STRUCTURAL INTEGRITY

See Appendix E for EGLE's sewer structural integrity spreadsheet that documents all the sanitary sewers anticipated to be replaced as part of this project have PACP Level 4 or 5 structural defects.

6.4 FISCAL SUSTAINABILITY PLAN

A Fiscal Sustainability Plan (FSP) will be developed for the sanitary sewers to be replaced under this project. The signed FSP form will be included in the final version of this Project Plan.

POCSDS continues to CCTV any sanitary sewer segments not previously inspected as resources and budget allows. The inspections are then added to the system's Asset Management Plan to determine any required interventions.

The system's existing asset registry will be updated with information on facilities impacted by the project. Data for existing facilities will be updated with new data and asset replacement dates. At the conclusion of the project the inventory will be fully updated to accurately reflect the improvements. Condition and performance data will be updated as well. This will provide a benchmark to judge future performance by.

The useful life estimates will be updated for the replaced assets and be used to plan for future service and replacement costs.

Appendix A — CWSRF Cost Analysis

SUMMARY OF MONETARY EVALUATION

	Alt. 5: Targeted Replacement of Existing Sanitary Sewers and Structures
Capital Costs	\$19,400,000
Annual OM&R Costs	\$0
20 Year Salvage Value	\$8,967,000
Net Present Worth	\$10,433,000
Annuual Equivalent Present Worth	\$650,400

AVERAGE WEIGHTED USEFUL LIFE OF ALT #5:**70.0 YEARS****Notes:***Net Present Worth is the sum of capital costs, OM&R costs less 20 year salvage value.**Present Worth Costs are based on Straight Line Depreciation and no inflation.**2025 EPA Planning Discount rate = 2.2%*

SUMMARY OF USER COSTS

FY2026 PONTIAC SDS CWSRF		
Total Capital & Annual O&M Costs, Alternative 5:	<u>Total Capital Cost:</u>	<u>Total REUs:</u>
	\$19,400,000	27,290
ESTIMATED MONTHLY USER COST: (With no principal forgiveness/grant)	<u>20 Year Loan</u> \$2.96	

**ENGINEER'S OPINION OF PROBABLE PROJECT COST**

Bloomfield Hills, MI

Telephone: (248) 454-6300

PROJECT: **Alt. 5: Targeted Replacement of Existing Sanitary Sewers and Structures**DATE: **3/21/2025**LOCATION: **PCR No. 1 Drain Sanitary Sewer System**PROJECT NO. **20240834**BASIS FOR ESTIMATE: ☒ CONCEPTUAL ☐ PRELIMINARY ☐ FINALESTIMATOR: **SLD**WORK: **Replace Existing Storm Sewers and Manhole Structures for**CHECKED BY: **DWM****Sewer Pipes That Could Not Be Repaired with Trenchless Techniques**CURRENT ENR: **13766**

USEFUL LIFE	DESCRIPTION	QUANT.	UNIT	UNIT AMOUNT	TOTAL AMOUNT
70	ID 483175 8 inch San Sewer Replace -- 283 lft	1	LS	\$ 283,000	\$283,000
70	ID 486397 8 inch San Sewer Replace -- 352 lft	1	LS	\$ 351,840	\$352,000
70	ID 486451 8 inch San Sewer Replace -- 317 lft	1	LS	\$ 317,390	\$317,000
70	ID 488077 8 inch San Sewer Replace -- 349 lft	1	LS	\$ 349,460	\$349,000
70	ID 490111 12 inch San Sewer Replace -- 284 lft	1	LS	\$ 284,310	\$284,000
70	ID 490117 8 inch San Sewer Replace -- 382 lft	1	LS	\$ 381,850	\$382,000
70	ID 490135 8 inch San Sewer Replace -- 213 lft	1	LS	\$ 212,820	\$213,000
70	ID 490939 10 inch San Sewer Replace -- 301 lft	1	LS	\$ 301,010	\$301,000
70	ID 492151 8 inch San Sewer Replace -- 461 lft	1	LS	\$ 461,480	\$461,000
70	ID 492817 8 inch San Sewer Replace -- 297 lft	1	LS	\$ 297,270	\$297,000
70	ID 493009 8 inch San Sewer Replace -- 308 lft	1	LS	\$ 307,960	\$308,000
70	ID 493039 8 inch San Sewer Replace -- 197 lft	1	LS	\$ 196,700	\$197,000
70	ID 493069 8 inch San Sewer Replace -- 238 lft	1	LS	\$ 238,480	\$238,000
70	ID 493261 8 inch San Sewer Replace -- 300 lft	1	LS	\$ 299,570	\$300,000
70	ID 493561 6 inch San Sewer Replace -- 144 lft	1	LS	\$ 143,950	\$144,000
70	ID 495511 12 inch San Sewer Replace -- 350 lft	1	LS	\$ 350,470	\$350,000
70	ID 495757 8 inch San Sewer Replace -- 314 lft	1	LS	\$ 314,340	\$314,000
70	ID 495805 8 inch San Sewer Replace -- 327 lft	1	LS	\$ 326,570	\$327,000
70	ID 495835 8 inch San Sewer Replace -- 300 lft	1	LS	\$ 299,550	\$300,000
70	ID 496297 8 inch San Sewer Replace -- 170 lft	1	LS	\$ 169,690	\$170,000
70	ID 496957 8 inch San Sewer Replace -- 290 lft	1	LS	\$ 289,620	\$290,000
70	ID 497437 8 inch San Sewer Replace -- 243 lft	1	LS	\$ 243,340	\$243,000
70	ID 497551 15 inch San Sewer Replace -- 310 lft	1	LS	\$ 309,720	\$310,000
70	ID 497749 8 inch San Sewer Replace -- 362 lft	1	LS	\$ 362,310	\$362,000
70	ID 497863 8 inch San Sewer Replace -- 252 lft	1	LS	\$ 251,880	\$252,000
70	ID 498601 8 inch San Sewer Replace -- 440 lft	1	LS	\$ 440,470	\$440,000
70	ID 500383 10 inch San Sewer Replace -- 25 lft	1	LS	\$ 24,780	\$25,000
70	ID 501391 12 inch San Sewer Replace -- 283 lft	1	LS	\$ 282,550	\$283,000
70	ID 501577 8 inch San Sewer Replace -- 267 lft	1	LS	\$ 267,370	\$267,000
70	ID 503299 12 inch San Sewer Replace -- 213 lft	1	LS	\$ 213,080	\$213,000
70	ID 613332 15 inch San Sewer Replace -- 314 lft	1	LS	\$ 313,690	\$314,000
70	ID 613647 8 inch San Sewer Replace -- 248 lft	1	LS	\$ 248,240	\$248,000
70	ID 630389 10 inch San Sewer Replace -- 123 lft	1	LS	\$ 123,240	\$123,000
70	ID 630819 10 inch San Sewer Replace -- 95 lft	1	LS	\$ 94,710	\$95,000
70	ID 661678 15 inch San Sewer Replace -- 212 lft	1	LS	\$ 212,350	\$212,000
70	ID 511129 8 inch San Sewer Replace -- 150 lft	1	LS	\$ 149,650	\$150,000
70	ID 506215 10 inch San Sewer Replace -- 305 lft	1	LS	\$ 305,480	\$305,000
70	ID 492163 8 inch San Sewer Replace -- 403 lft	1	LS	\$ 403,330	\$403,000
70	ID 514441 8 inch San Sewer Replace -- 54 lft	1	LS	\$ 54,050	\$54,000
70	ID 495433 10 inch San Sewer Replace -- 365 lft	1	LS	\$ 365,490	\$365,000
70	ID 485569 8 inch San Sewer Replace -- 402 lft	1	LS	\$ 401,870	\$402,000
70	ID 493723 8 inch San Sewer Replace -- 241 lft	1	LS	\$ 241,300	\$241,000
	Unit Cost Subtotal	1	LS	\$ 11,486,230	\$11,484,000
	Contractor General Conditions, Overhead and Permits	15	%		\$1,722,600
	Contingencies	20	%		\$2,296,800
	Construction Subtotal				\$15,503,400
	Engineering, Legal, and Administration	25	%		\$3,875,850
	TOTAL PROJECT COST				\$19,400,000

**Pontiac Sanitary Disposal System
FY2026 CWSRF Project Plan**

**Alternative Analysis
Alt. 5: Targeted Replacement of Existing Sanitary Sewers and Structures
Present Worth Calculations**

<u>CAPITAL COST</u>	TOTAL CAPITAL COST ⁽¹⁾	SERVICE LIFE (YEARS)	PRESENT WORTH ⁽²⁾
Targeted Sanitary Sewer Replacement	\$19,400,000	70	\$ 10,433,000.00
TOTAL CAPITAL COST	\$ 19,400,000.00		\$ 10,433,000.00
PW OF SALVAGE VALUE (FIRST COST - PRESENT WORTH)	\$ 8,967,000		
<u>ANNUAL OPERATION AND MAINTENANCE COST</u>			
ANNUAL O, M & R COST		\$0.00	
TOTAL ANNUAL O, M & R COST		\$0.00	
TOTAL ANNUAL O&M COST ⁽³⁾			\$0.00
PRESENT WORTH			\$ 10,433,000.00
<u>AVERAGE ANNUAL EQUIVALENT COST</u>			
			\$ 650,400.00

Notes:

- (1) Cost includes contingencies, engineering, administration, legal, permitting, etc.
- (2) Cost is based on a study period of 20 years and a discount rate of 2.2%.
Present Worth Costs are based on Straight Line Depreciation and no inflation.

Appendix B — EGLE Submittal Forms

(To be included in Final version)

Appendix C — Project Planning Public Meeting

NOTICE OF PROJECT PLANNING PUBLIC MEETING

The City of Pontiac Sewage Disposal System will hold a public meeting on the proposed Clean Water State Revolving Fund (CWSRF) Sanitary System Improvements project for the purpose of receiving comments from interested persons.

The meeting will be held at **4:00 p.m.** on Tuesday, April 8, 2025, virtually and at the Oakland County Water Resources Commissioner's Office (1 Public Works Dr., Waterford, MI.)

The purpose of the proposed project is to make improvements to the existing sanitary sewer systems in order to continue to meet the required level of service for the systems.

Project construction will involve replacement of existing sanitary pipes and structures.

Impacts of the proposed project include temporary noise and disruption to the public due to construction of the required improvements, which will be offset by improvements that will reduce the likelihood of system failures.

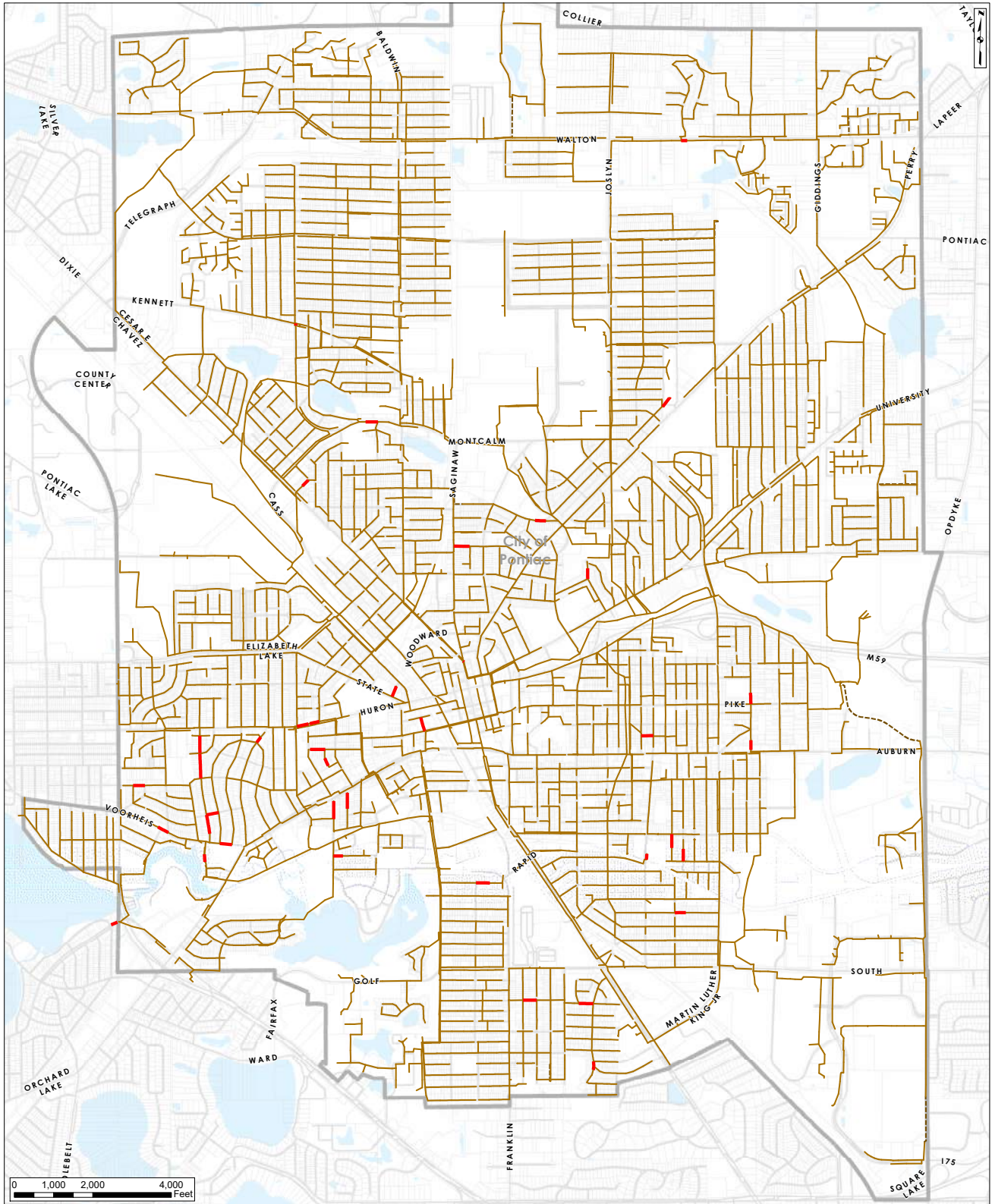
The estimated cost to users for the proposed project is approximately \$2.96 per household over 20 years. However, the system will likely qualify as "overburdened" and may be eligible for additional grant funding and/or principal forgiveness, which would reduce the cost. The system will also have the opportunity to reduce the scope of work and potential cost during the design phase and/or defer the project should funding not be awarded.

Copies of the plan detailing the proposed project are available for inspection at the following location: Oakland County Water Resources Commissioner's Office (1 Public Works Dr., Waterford, MI.)

Written comments received before the meeting record is closed on Tuesday, April 8, 2025, will receive responses in the final project planning document. Written comments should be sent to Stephanie Lajdziak at lajdziaks@oakgov.com before TUESDAY, APRIL 8, 2025 at 4:00 P.M.

***Appendix D — Overburdened and Significantly Overburdened
Community Status Determination Worksheet
(To be included in Final version)***

Appendix E — EGLE Structural Integrity Worksheet and Asset Data



DISCLAIMER:
The information displayed in this map is compiled from recorded deeds, plats, tax maps, surveys and other public records. Although this information is intended to accurately reflect public information, it is not a legally recorded map or survey and is not intended to be used as one. Users should consult primary/original information sources where appropriate.

2026 Pontiac Sewer Replacement CWSRF

— Sewer Gravity Main
— Full Replacement



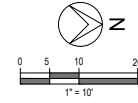
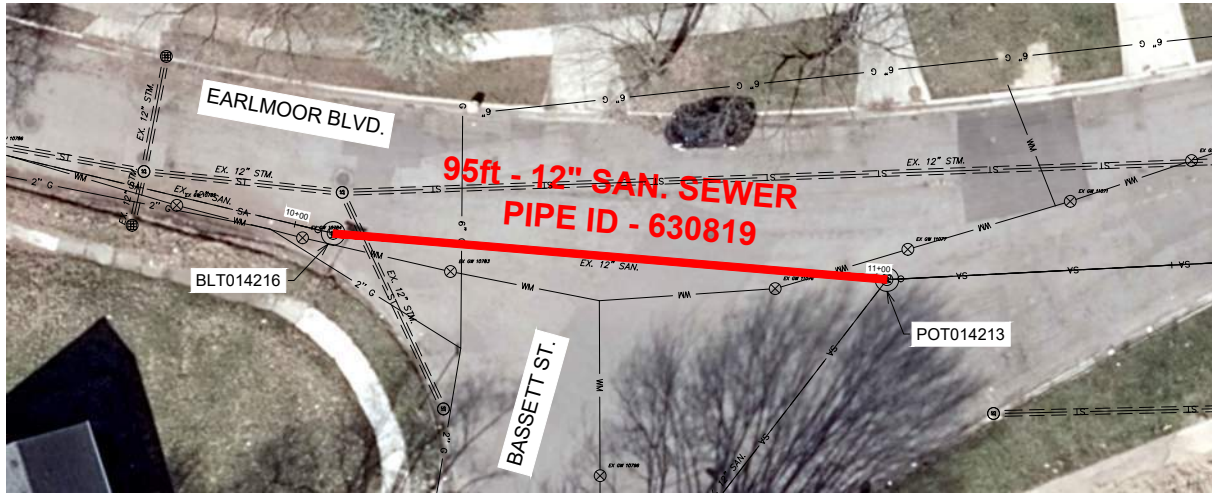
MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
CWSRF Sewer Structural Integrity Template
Sewers

Pipe Segment Reference / Manhole- Manhole ID*	Street*	Pipe Length*	NASSCO PACP Structural Quick Rating Score*	Pipe Material, if Known	Year Constructed, if Known	Types of Structural Defects Found (O&M defects are not CWSRF- eligible)	Justification of Need (required for non-NASSCO structural 4 or 5 rated segments)*
483175	Going	283	5241	Clay or VCP	1/1/1931	Hole SV, Hole VV, Hole, Alignment Change Multi, Deposits Multi, Sag 10-25%; Lots of JOM,	N/A
485569	Chamberlain	402	524O	Clay or VCP	1/3/2019	Hole Soil Visible @ 2 Points, Point Repair Defective	N/A
486397	Osmun	352	544A	Clay or VCP	1/1/1929	Replace pipe	N/A
486451	Edith	317	5C49	Clay or VCP	1/1/1928	Replace pipe	N/A
488077	Motor	349	483Z	Clay or VCP	1/1/1927	Replace pipe	N/A
490111	Porter	284	4A35	Clay or VCP	1/1/1933	40-60% Sag 143-239 ft, Tap Broken	N/A
490117	Henry Clay	382	564N	Clay or VCP	1/1/1928	Replace pipe	N/A
490135	Miller	213	544D	Clay or VCP	1/1/1928	Replace pipe	N/A
490939	Johnson	301	5437	Clay or VCP	1/1/1928	UNKNOWN MH AT 26 ft, 60-90% Sag @ 126 - 247 ft HOLE VV AT 234 FT - Lined pipe and almost all 60% or more sag	N/A
492151	Bartlett	461	544K	Clay or VCP	1/1/1931	Blue Object Intruding, Broken SV Multi, Broken Multi, Fracture Multi, Joint Angular & Offset Large, Sag 30-50%	N/A
492163	Crawford	403	5A4C	Clay or VCP	7/16/2020	Replace pipe	N/A
492817	Genesee	297	523A	Clay or VCP	1/1/1938	Replace pipe	N/A
493009	Voorheis	308	4436	Clay or VCP	1/1/1931	Replace pipe	N/A
493039	Myra	197	544G	Clay or VCP	1/1/1920	Broken SV Multi, Joint Offset Large Defective Multi, Point Repair Replacement Multi, Roots at Joints, Sag 40%	N/A
493069	Chippewa	238	534B	Clay or VCP	1/1/1931	Sag 90%	N/A
493261	Erie	300	534G	Clay or VCP	1/1/1930	HOLE VV JOINT OFF L SAG BROKEN SV REPEATING - agree full replacement	N/A
493561	Sanford	144	514A	Clay or VCP	1/1/1935	Point Repair 35-45 ft, Hole SV, Broken Multi, Fracture Multi	N/A
493723	Lake	241	544H	Clay or VCP	5/21/2020	Replace pipe	N/A
495433	Nebraska	365	544B	Clay or VCP	9/19/2019	Lined pipe: 60% Sag @ 54 & 291 ft 80%, 70%, 55% sags also	N/A
495511	Harvey	350	4B3Z	Clay or VCP	8/1/1926	40-50% Sag @ 46 - 344 ft, Hinge Fracture & Broken @ Multiple Points	N/A
495757	Iroquois	314	4C3R	Clay or VCP	1/1/1931	Sags 30-60%, Broken, Joint Offset Large	N/A
495805	Menominee	327	5135	Clay or VCP	1/1/1931	Replace pipe	N/A
495835	Chippewa	300	4137	Clay or VCP	1/1/1926	Sags 40-50%	N/A
496297	Ottawa	170	5446	PVC	1/1/1931	POINT REPAIR AT INTRUDING TAP HOLE SV BROKEN MULTI Taps Defective - Full replacement	N/A
496957	Pike	290	5449	Clay or VCP	1/1/1946	3 point repairs and deposits/cracks - replace.	N/A
497437	Astor	243	4G3G	Clay or VCP	1/1/1946	Sag 70% Line Down 90%	N/A
497551	Tasmania	310	544S	Clay or VCP	1/1/1927	Large Fracture Multiple, Hinge Fracture Multiple, Hole VV, Joint Separated	N/A
497749	Pike	362	512E	Clay or VCP	1/1/1934	Sag 30-60%	N/A
497863	Henderson	252	5A3A	Clay or VCP	1/1/1928	Already Lined and has 40%, 80% and 100% sags	N/A
498601	Miami	440	5348	Clay or VCP	1/1/1926	Hole VV Multi, Broken Multi, Fracture Multi, 7 Taps Defective	N/A
500383	Saginaw	25	5200	Clay or VCP	1/1/1928	Broken VV, Hole SV	N/A
501391	Oliver	283	514A	Clay or VCP	1/1/1928	Replace pipe	N/A
501577	Omar	267	554D	Clay or VCP	1/1/1930	Hole SV Multi, Hole VV, Broken VV, Alignment Change Multi	N/A
503299	Gerdon	213	5642	Clay or VCP	8/21/1929	BROKEN MULTI DEFORMED - Check flows, C&G then liner or replace?	N/A
506215	Ridgemont	305	5F3G	PVC	1/28/2020	Replace pipe	N/A
511129	Walton	150	5A43	Clay or VCP	6/26/2018	Sags 50-90% Broken Multi Camera Underwater	N/A
514441	Kennett	54	5A32	Clay or VCP	6/16/2021	BROKEN VV LONGITUDINAL, Deformed - Possibly liner?	N/A
613332	Burt	314	5C31	Clay or VCP	1/1/1937	Already Lined and has 80% and 100% sags	N/A
613647	Chippewa	248	5448	Clay or VCP	1/1/1926	Sags 40-60% 120-235 ft Broken SV Multi, Broken Multi, 3 Def Taps: 2 roots, 1 broke at connection	N/A
630389	Earlmoor	123	4536	Clay or VCP	8/1/1926	Sags 40 % Broken, Multi Infill	N/A
630819	Earlmoor	95	5345	Clay or VCP	8/1/1926	Sag 40-50% 20-60 ft Broken SV Multi, Broken VV, Broken	N/A
661678	Garland	212	4A3D	Clay or VCP	1/1/1926	Full Replacement, Lots of sags and inlet pipes.	N/A

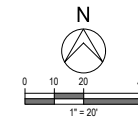
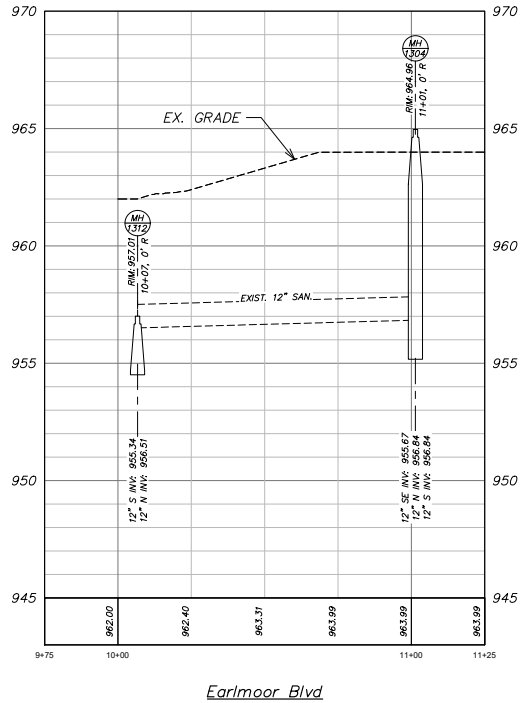
Questions or concerns should be directed to the Nondiscrimination Compliance Coordinator at 517-249-0906 or
If you need this information EGLE-Accessibility@Michigan.gov

as required by applicable laws and regulations.

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This form and its contents are subject to the Freedom of Information Act and may be released to the public.



- LEGEND**
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



HRC
HUBBELL, ROTH & CLARK, INC.
CONSULTING ENGINEERS SINCE 1916

155 HULET DRIVE P.O. BOX 824
BLOOMFIELD HILLS, MICH. 48303 - 0824

PHONE: (248) 454-6300
FAX (Int. Phone): (248) 454-6312
FAX (Ext. Phone): (248) 454-6309

WEB SITE: www.hrcengr.com

DATE	ADDITIONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.

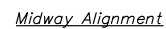
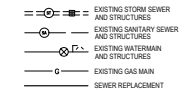


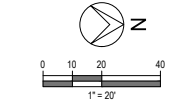
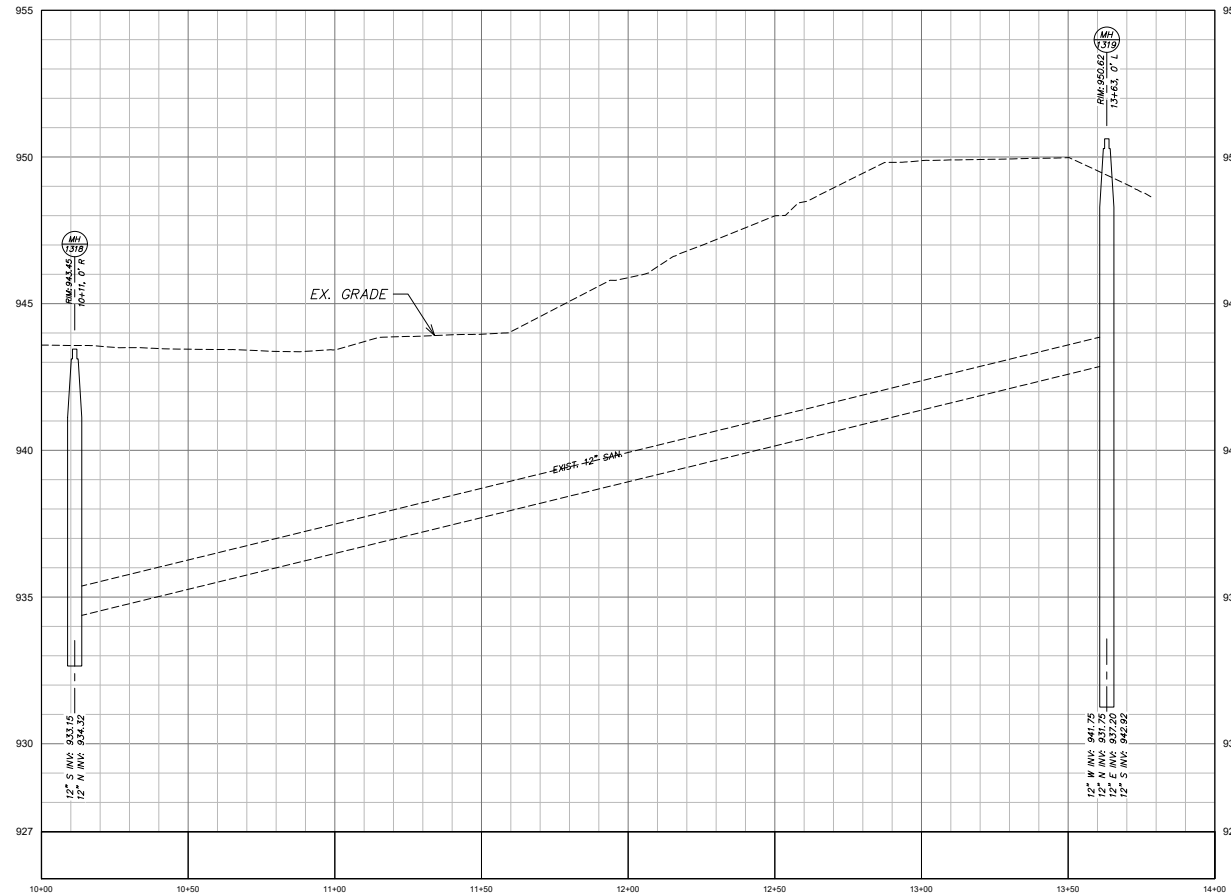
OAKLAND COUNTY WATER RESOURCES COMMISSIONER

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

PIPE ID - 630819
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 10'
DATE FEBRUARY 2025	SHEET NO. C-XX





- LEGEND
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 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
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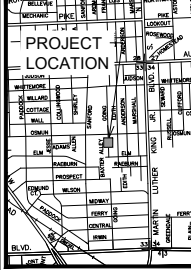
HRC
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CONSULTING ENGINEERS SINCE 1916

155 HULET DRIVE
BLOOMFIELD HILLS, MICH. P.O. BOX 824
48303 - 0824

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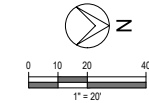
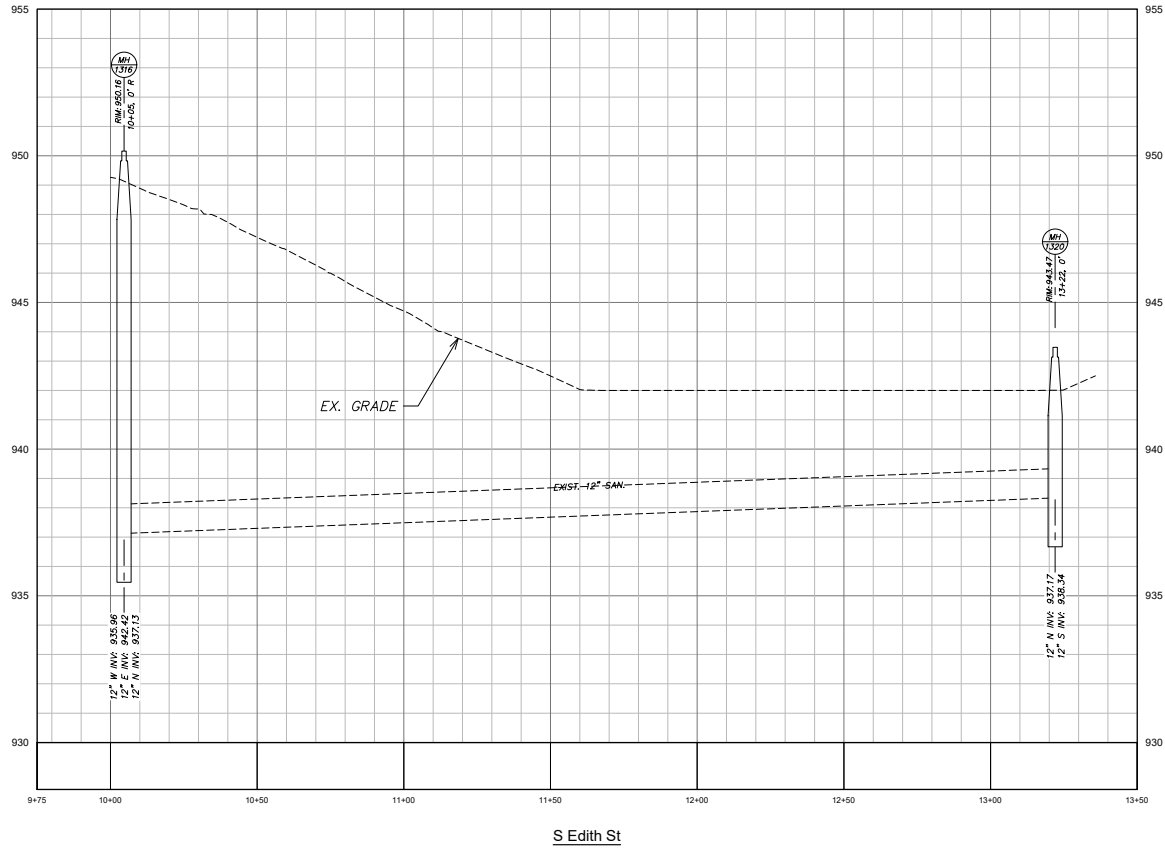


OAKLAND COUNTY WATER RESOURCES COMMISSION

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

PIPE ID - 486397
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

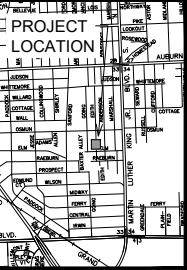


- LEGEND**
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 - EXISTING SANITARY SEWER AND STRUCTURES
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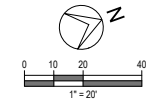
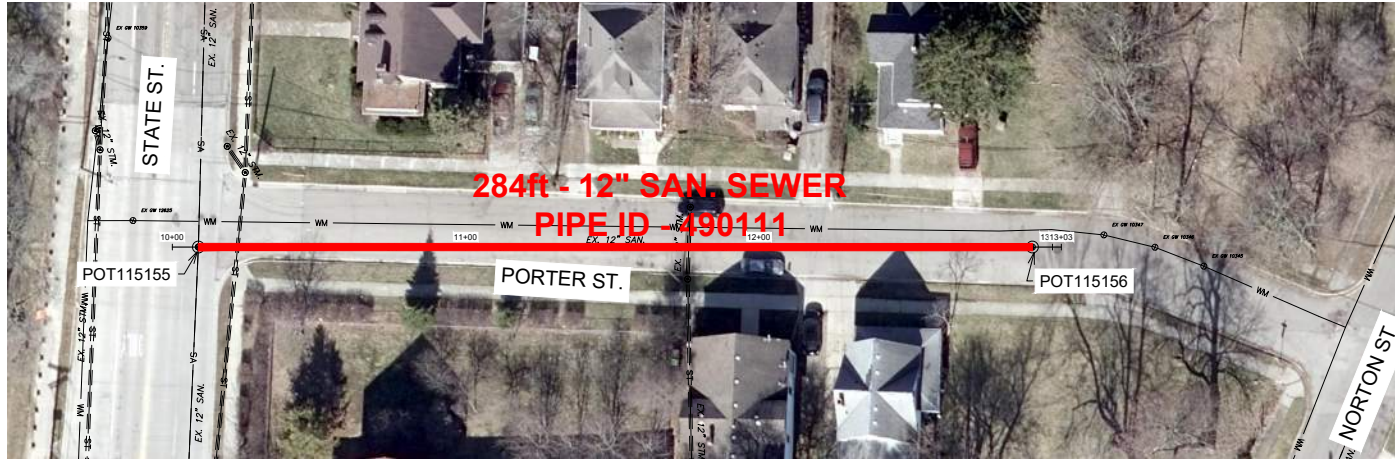
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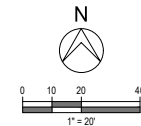
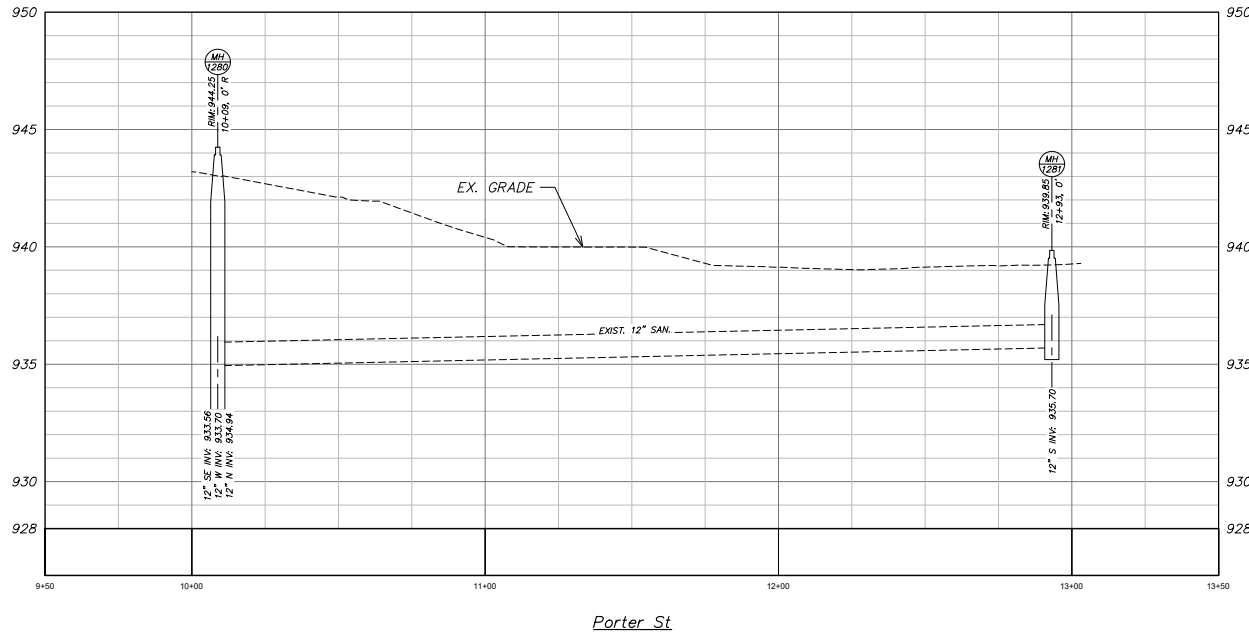
OAKLAND COUNTY WATER RESOURCES COMMISSIONER
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 486451
SANITARY SEWER
REPLACEMENT**

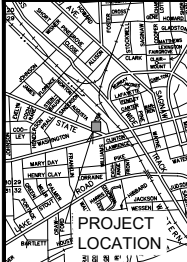
HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX OF



- LEGEND**
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 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



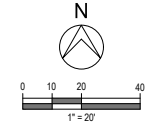
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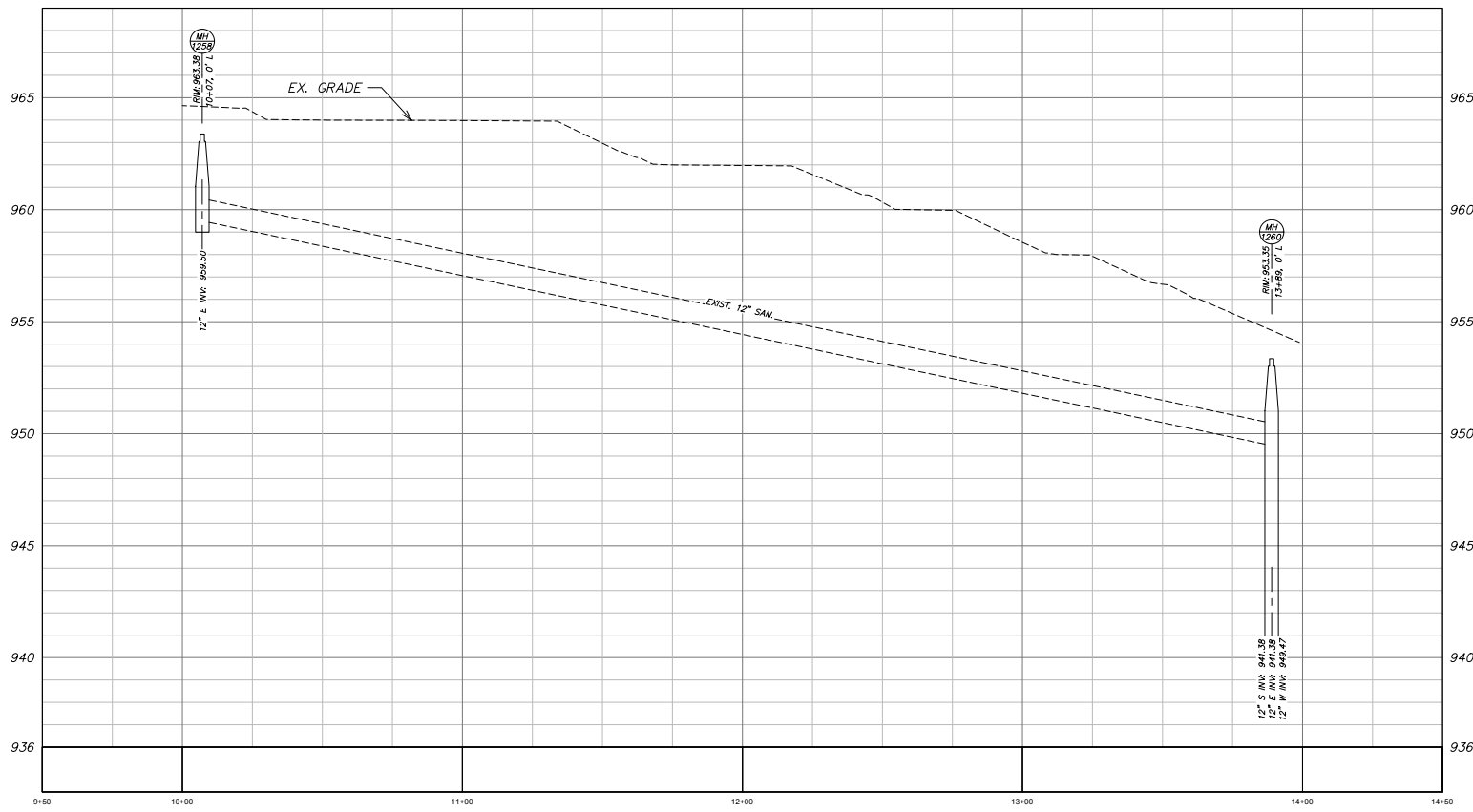
OAKLAND COUNTY WATER RESOURCES COMMISSION
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 490111
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX



- LEGEND
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 - SEWER REPLACEMENT



Henry Clay Ave



HRC
HUBBELL, ROTH & CLARK, INC.
CONSULTING ENGINEERS SINCE 1916
155 HULET DRIVE P.O. BOX 824
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PHONE: (248) 454-6300
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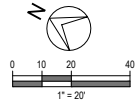
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APPROVED D.W.M.	



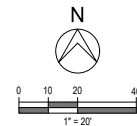
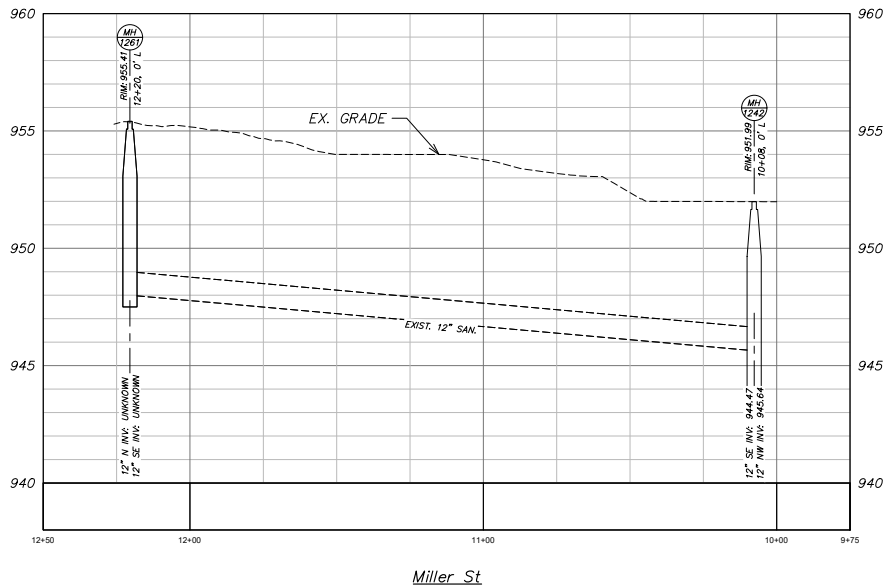
OAKLAND COUNTY WATER RESOURCES COMMISSIONER
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 490117
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

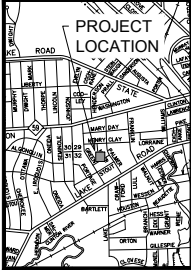


- LEGEND
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HRC
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155 HULEY DRIVE P.O. BOX 824
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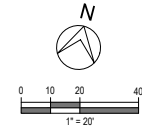
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APPROVED	D.W.M.



OAKLAND COUNTY WATER RESOURCES COMMISSIONER
CITY OF PONTIAC
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SYSTEM
FY2026 SRF
PIPE REPLACEMENTS

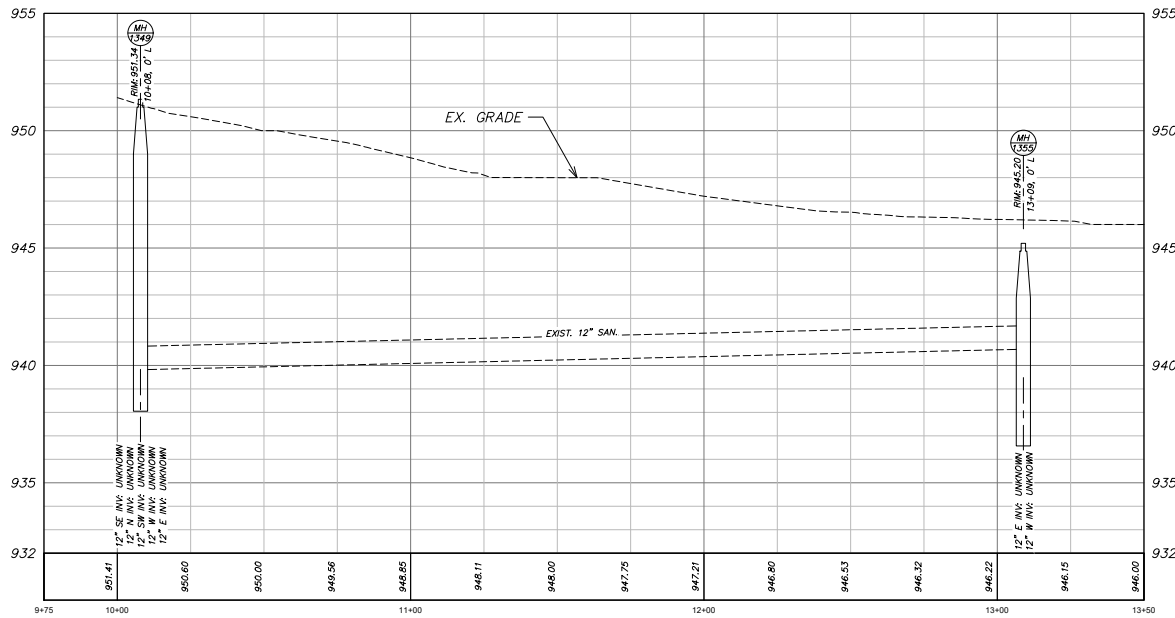
PIPE ID - 490135
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX OF



LEGEND

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- G— EXISTING GAS MAIN
- SEWER REPLACEMENT



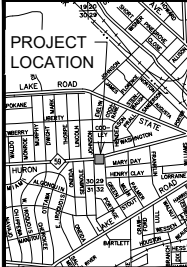
W Huron St



155 HULEY DRIVE
BLOOMFIELD HILLS, MICH.
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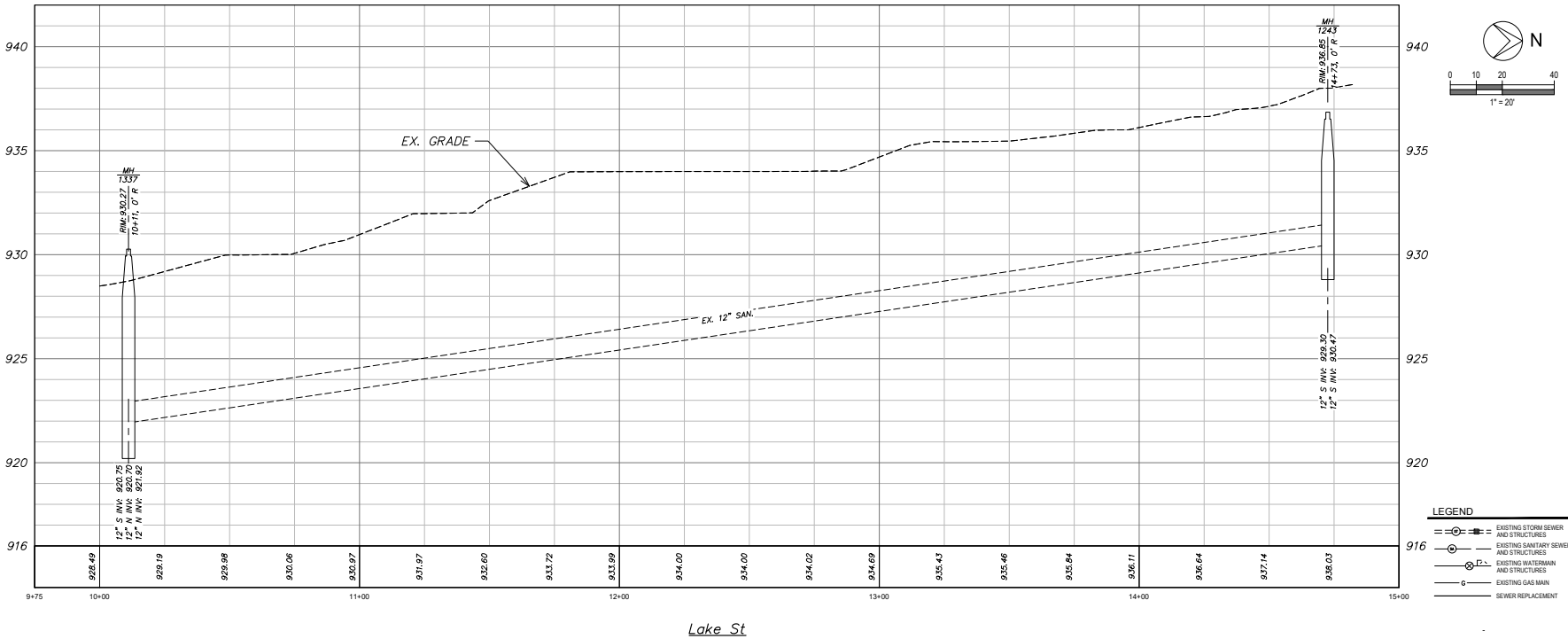


OAKLAND COUNTY WATER RESOURCES
COMMISSIONER

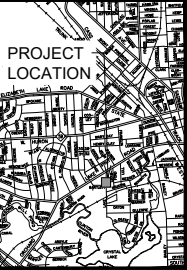
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 490939
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX OF



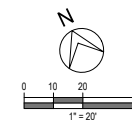
DATE	ADDITIONS AND/OR REVISIONS
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DRAWN	T.E.W.-A.S.L.
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APPROVED	D.W.M.



OAKLAND COUNTY WATER RESOURCES COMMISSIONER
**CITY OF PONTIAC
 SEWAGE DISPOSAL
 SYSTEM
 FY2026 SRF
 PIPE REPLACEMENTS**

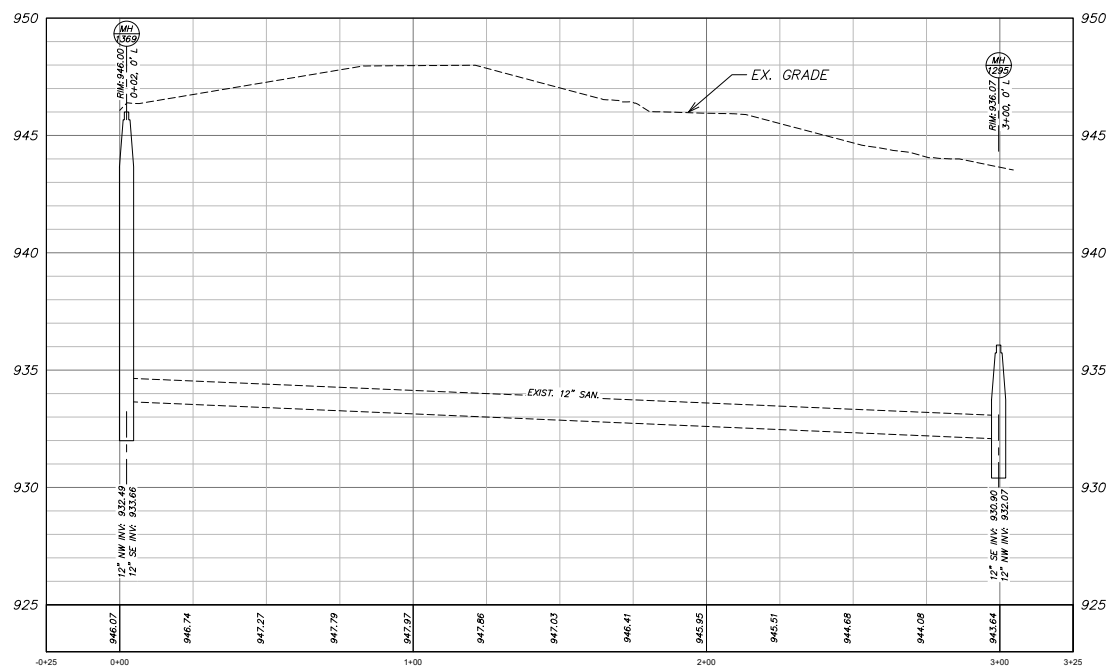
**PIPE ID - 492151
 SANITARY SEWER
 REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

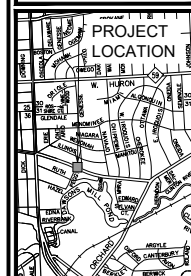


LEGEND

-  EXISTING STORM SEWER AND STRUCTURES
 EXISTING SANITARY SEWER AND STRUCTURES
 EXISTING WATERMAIN AND STRUCTURES
 EXISTING GAS MAIN
 SEWER DISPLACEMENT

[illegible]

DATE	ADDITIONS AND/OR REVISIONS
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CHECKED	S.L.D.
APPROVED	D.W.M.

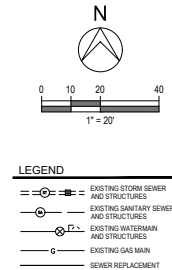
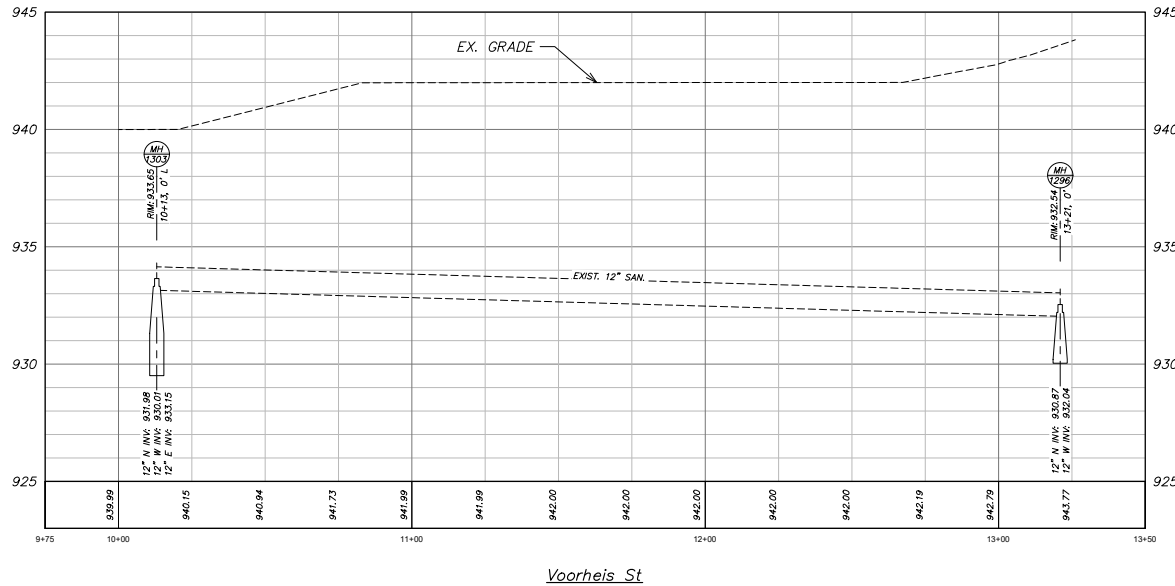


**OAKLAND COUNTY WATER RESOURCES
COMMISSIONER**

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

PIPE ID - 492817
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
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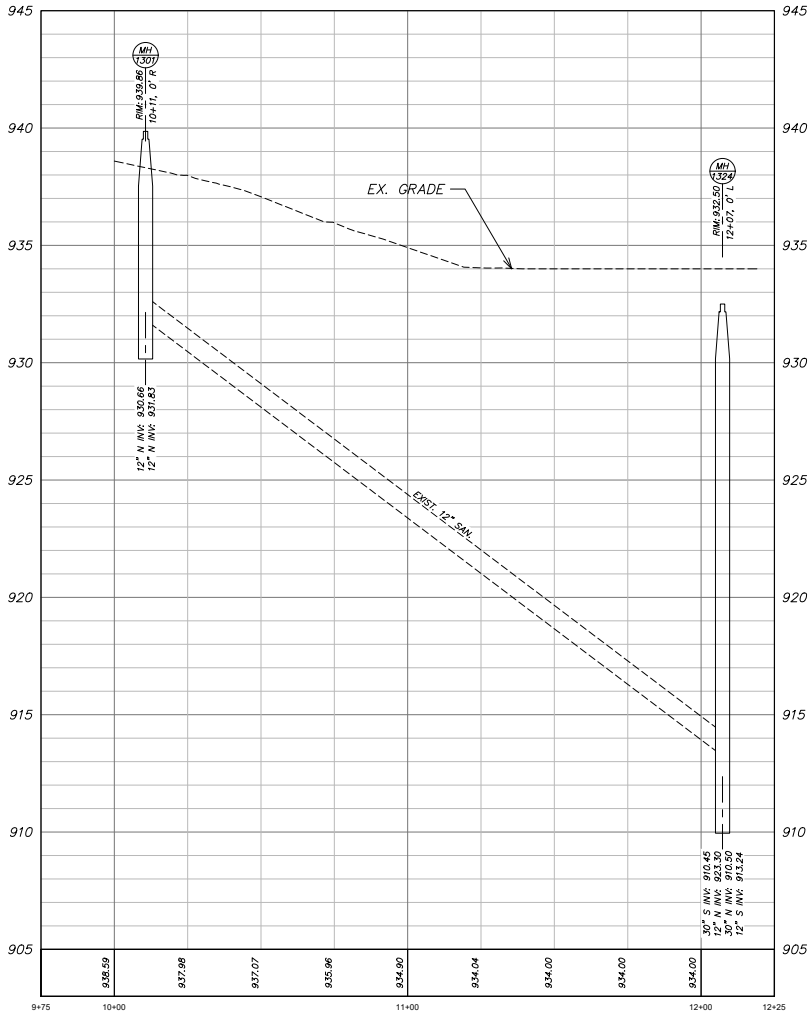
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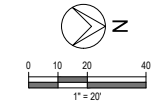
OAKLAND COUNTY WATER RESOURCES COMMISSION
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 493009
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX



Myra Ave



- LEGEND
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 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - G— EXISTING GAS MAIN
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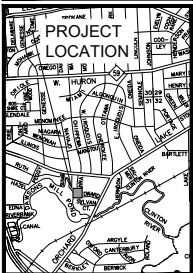
HRC
HUDNELL, ROTH & CLARK, INC.
CONSULTING ENGINEERS SINCE 1916

555 HULEY DRIVE
BLOOMFIELD HILLS, MICH. P.O. BOX 824
48303 - 0824

PHONE: (248) 454-6300
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FAX (248): (248) 454-6309

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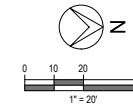


OAKLAND COUNTY WATER RESOURCES COMMISSION

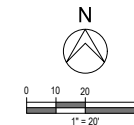
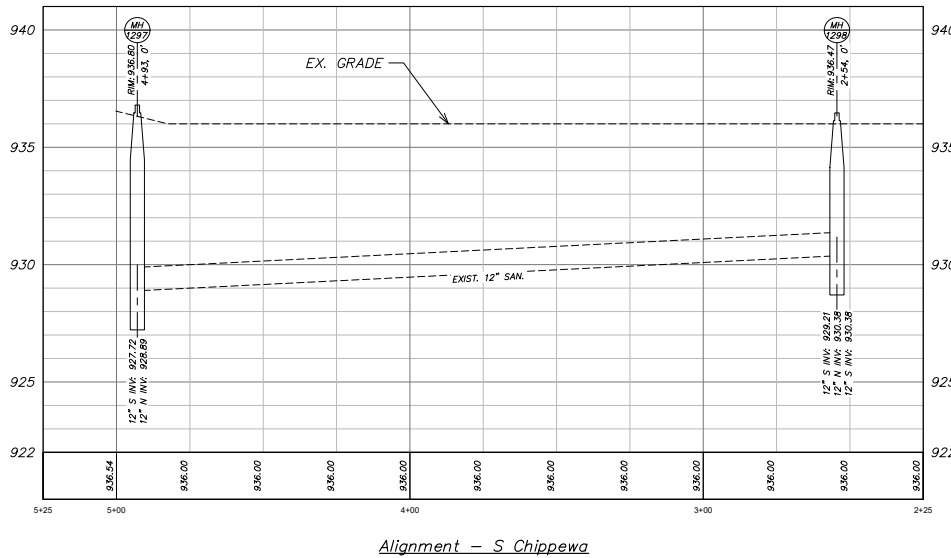
CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS

PIPE ID - 493039
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

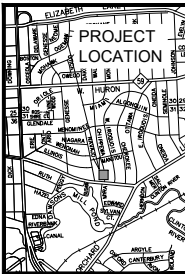


- LEGEND
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HRC
HUBBELL, ROTH & CLARK, INC.
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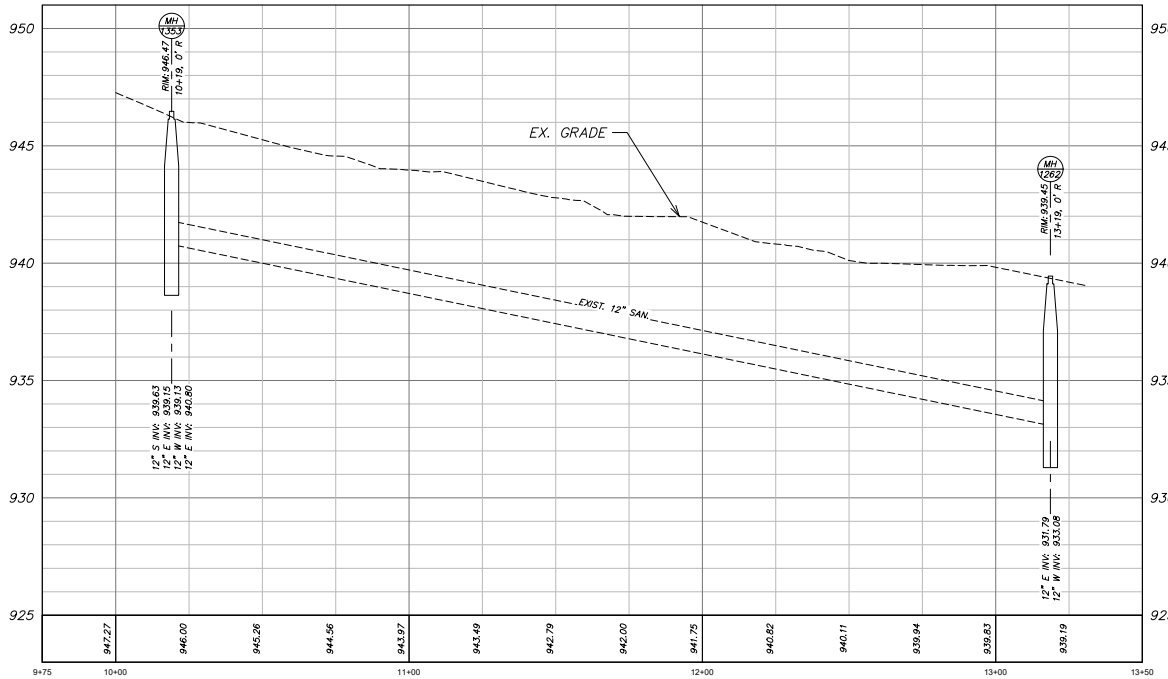
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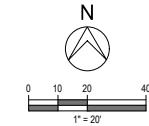
OAKLAND COUNTY WATER RESOURCES COMMISSIONER
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 483069
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX



Menominee Rd

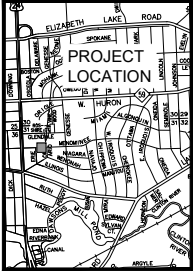


LEGEND	
	EXISTING STORM SEWER AND STRUCTURES
	EXISTING SANITARY SEWER AND STRUCTURES
	EXISTING WATERMAIN AND STRUCTURES
	EXISTING GAS MAIN
	SEWER REPLACEMENT



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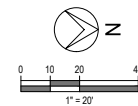
DATE	ADDITONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



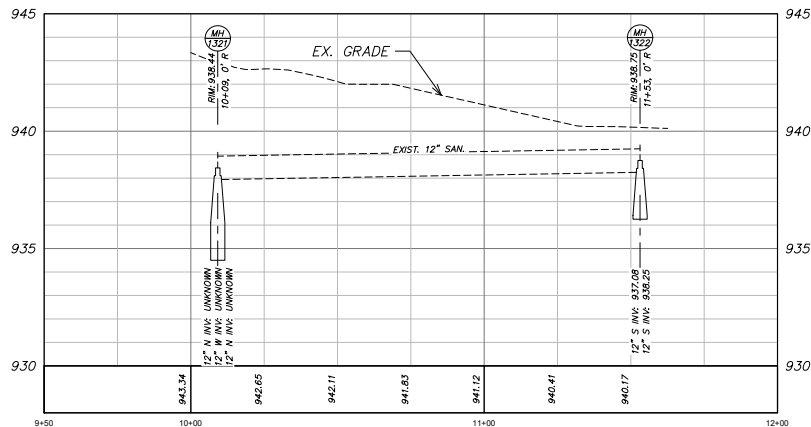
OAKLAND COUNTY WATER RESOURCES COMMISSIONER
CITY OF PONTIAC
SEWAGE DISPOSAL SYSTEM
FY2026 SRP
PIPE REPLACEMENTS

PIPE ID - 493261
SANITARY SEWER REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX



- LEGEND
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT

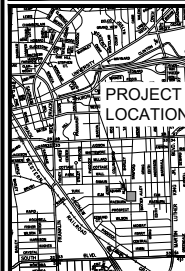


S. Sanford



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FAX (1st Floor): (248) 454-6312
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WEB SITE: www.hrcengr.com

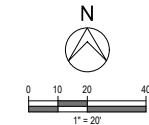
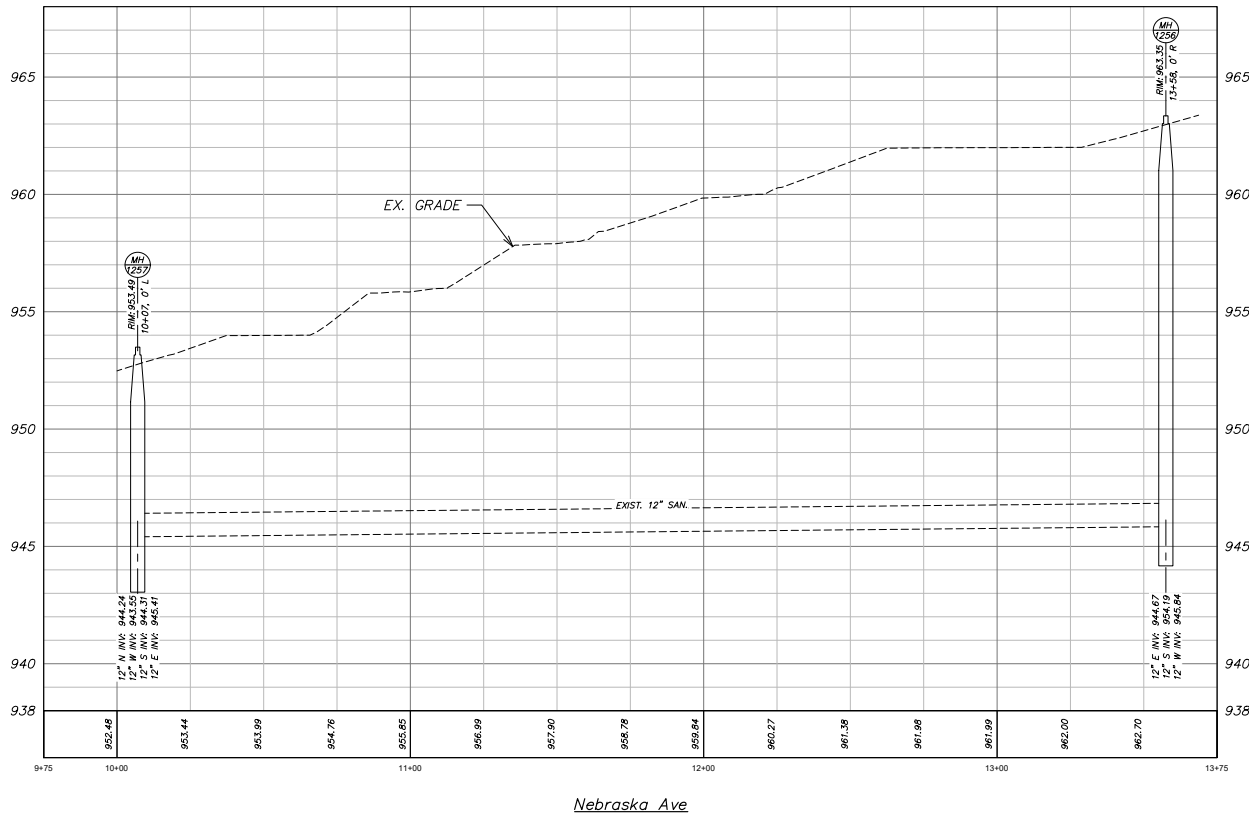
DATE	ADDITONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



OAKLAND COUNTY WATER RESOURCES COMMISSIONER
CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS

PIPE ID - 493561
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

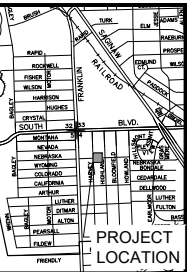


- LEGEND**
- : EXISTING STORM SEWER AND STRUCTURES
 - : EXISTING SANITARY SEWER AND STRUCTURES
 - : EXISTING WATERMAIN AND STRUCTURES
 - : EXISTING GAS MAIN
 - : SEWER REPLACEMENT



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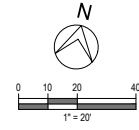
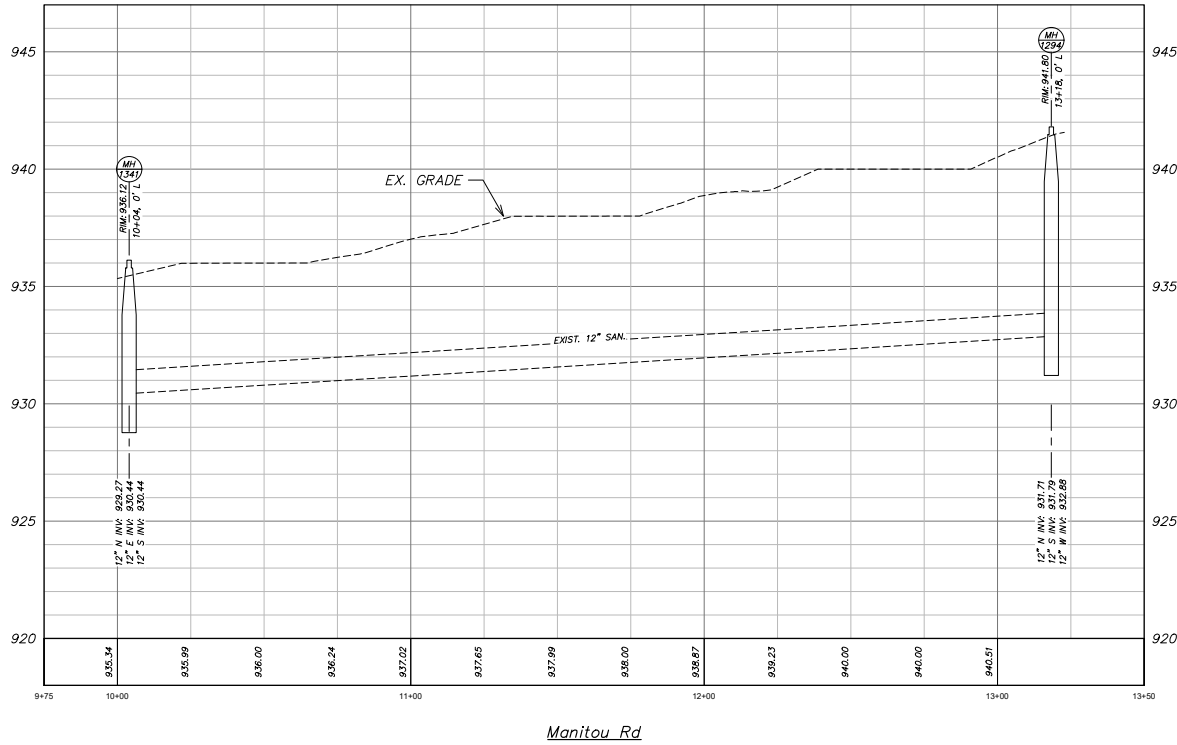


OAKLAND COUNTY WATER RESOURCES COMMISSIONER

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 495511
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX



- LEGEND
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



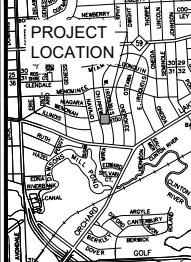
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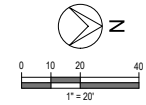


OAKLAND COUNTY WATER RESOURCES COMMISSIONER

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

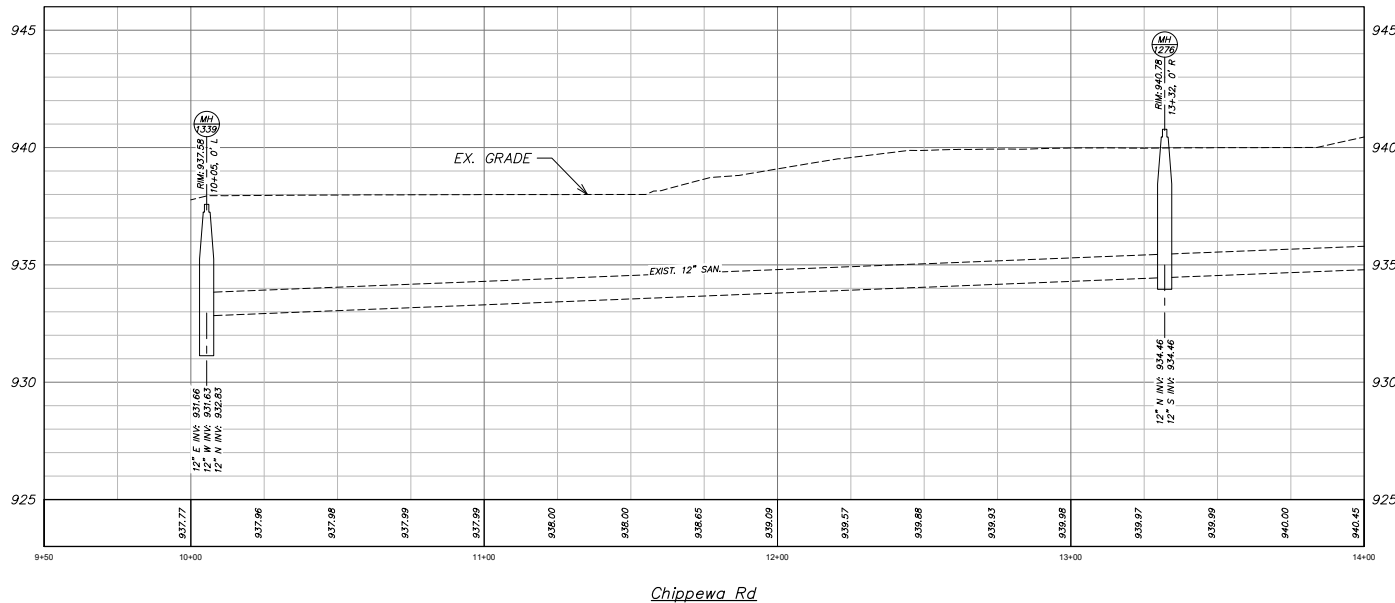
PIPE ID - 495757
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

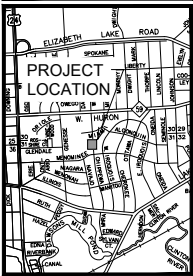


LEGEND

- EXISTING STORM SEWER AND STRUCTURES
- EXISTING SANITARY SEWER AND STRUCTURES
- EXISTING WATERMAIN AND STRUCTURES
- EXISTING GAS MAIN
- SEWER REPLACEMENT



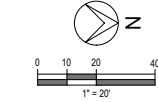
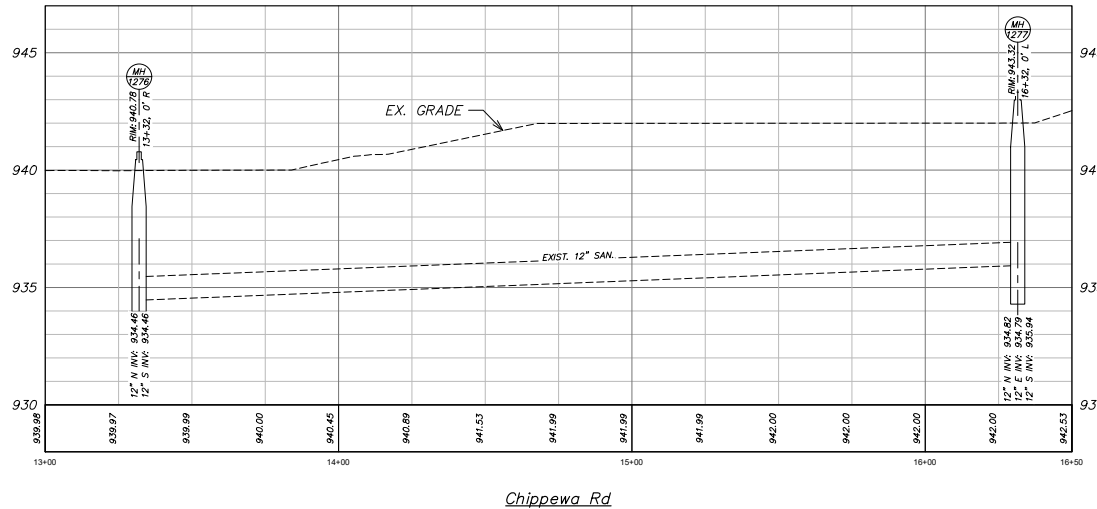
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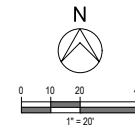
OAKLAND COUNTY WATER RESOURCES COMMISSIONER
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 495805
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

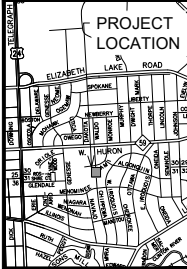


- LEGEND**
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



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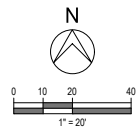
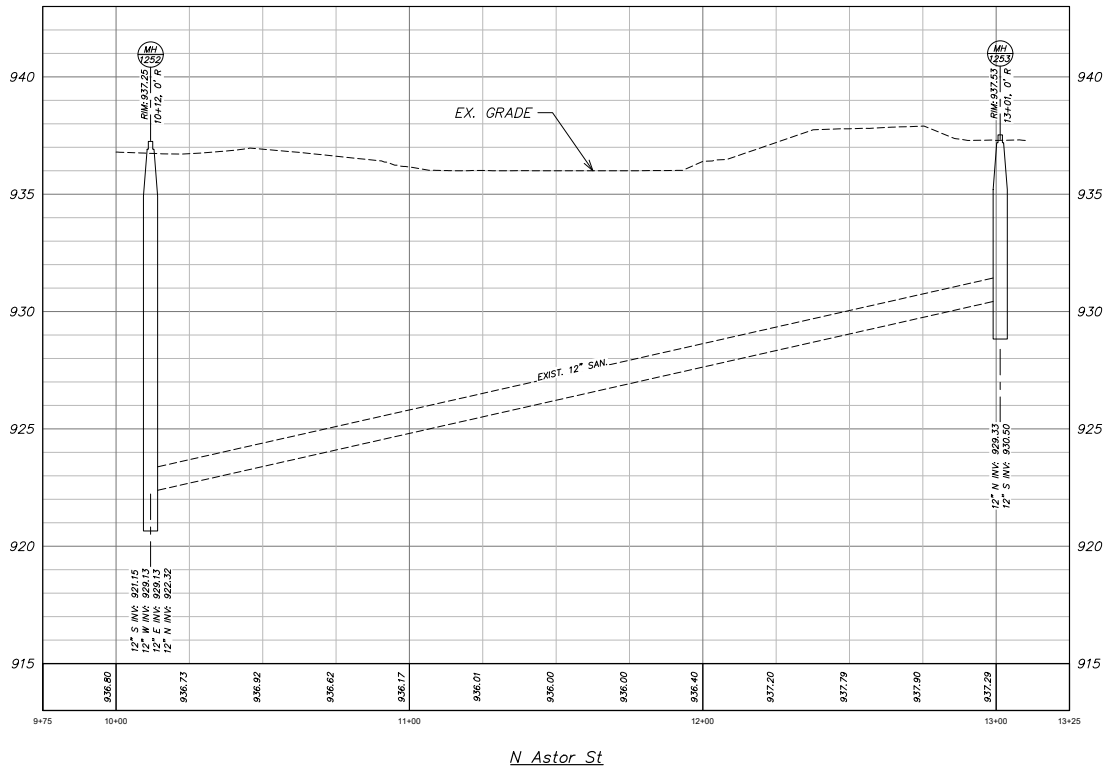
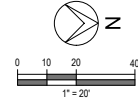


OAKLAND COUNTY WATER RESOURCES COMMISSIONER
CITY OF PONTIAC
SEWAGE DISPOSAL SYSTEM
FY2026 SRF PIPE REPLACEMENTS

PIPE ID - 495835
SANITARY SEWER REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX



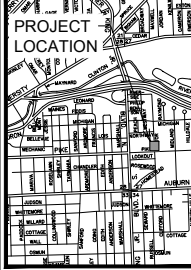


- LEGEND**
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



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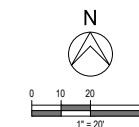
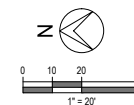
DATE	ADDITONS AND/OR REVISIONS
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CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRP
PIPE REPLACEMENTS

PIPE ID - 496957
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

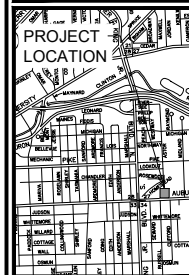


LEGEND

	EXISTING STORM SEWER AND STRUCTURES
	EXISTING SANITARY SEWER AND STRUCTURES
	EXISTING WATERMAIN AND STRUCTURES
	EXISTING GAS MAIN
	SEWER REPLACEMENT



DATE	ADDITIONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W. - A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



**OAKLAND COUNTY WATER RESOURCES
COMMISSIONER**

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

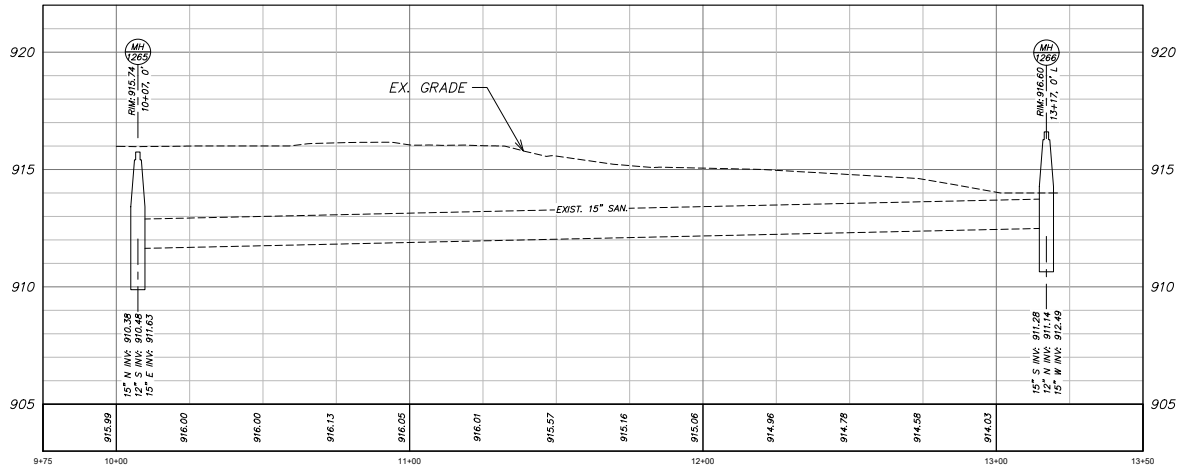
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SANITARY SEWER
REPLACEMENT

HRC JOB NO.
20240834

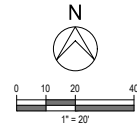
DATE
FEBRUARY 2025

SCALE
1" = 20'

SHEET NO. C-XX



Sewer Corssing Residential



- LEGEND
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



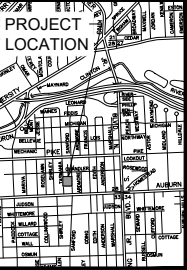
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APPROVED	D.W.M.

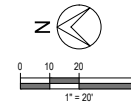


OAKLAND COUNTY WATER RESOURCES COMMISSIONER

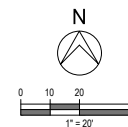
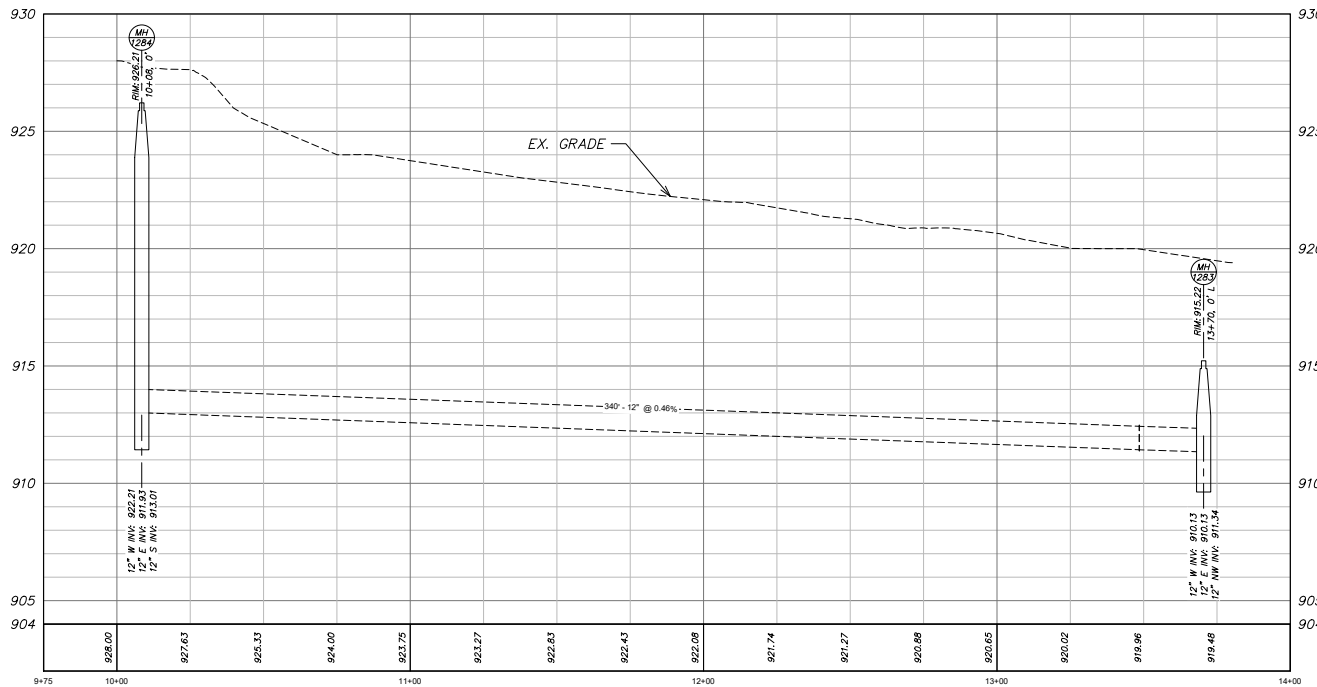
CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS

PIPE ID - 497551
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX OF

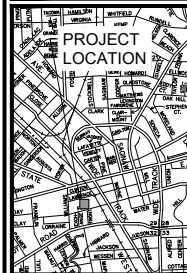


LEGEND	
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	EXISTING SANITARY SEWER AND STRUCTURES
	EXISTING WATERMAIN AND STRUCTURES
	EXISTING GAS MAIN
	SEWER REPLACEMENT



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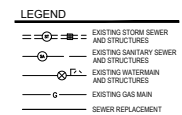
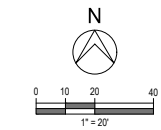
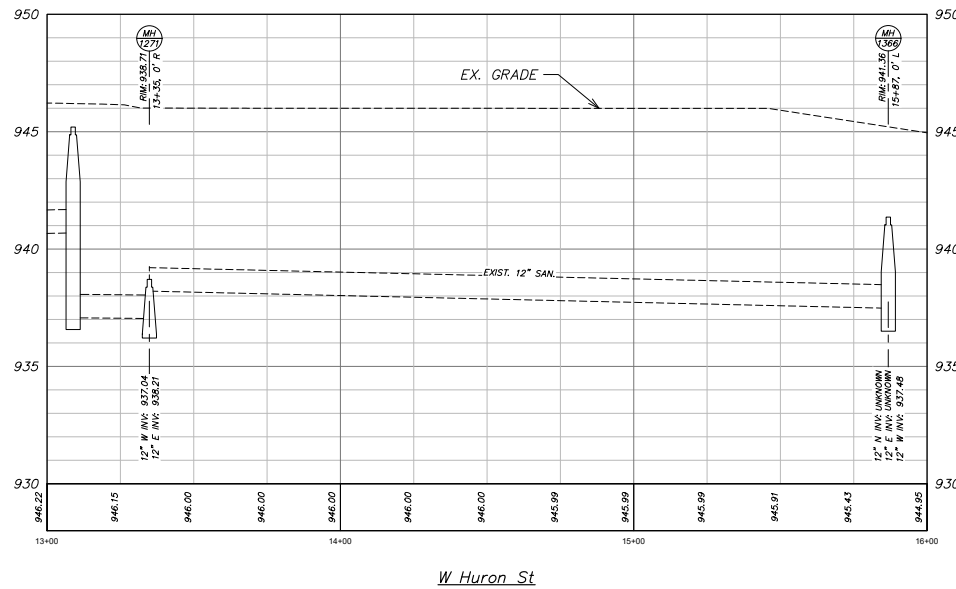
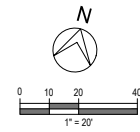
DATE	ADDITONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



OAKLAND COUNTY WATER RESOURCES
COMMISSIONER
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 497749
SANITARY SEWER
REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX OF



DATE	ADDITONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



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**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 497863
SANITARY SEWER
REPLACEMENT**

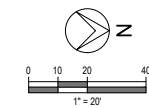
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DATE FEBRUARY 2025	SHEET NO. C-XX

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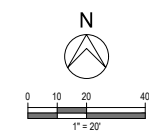
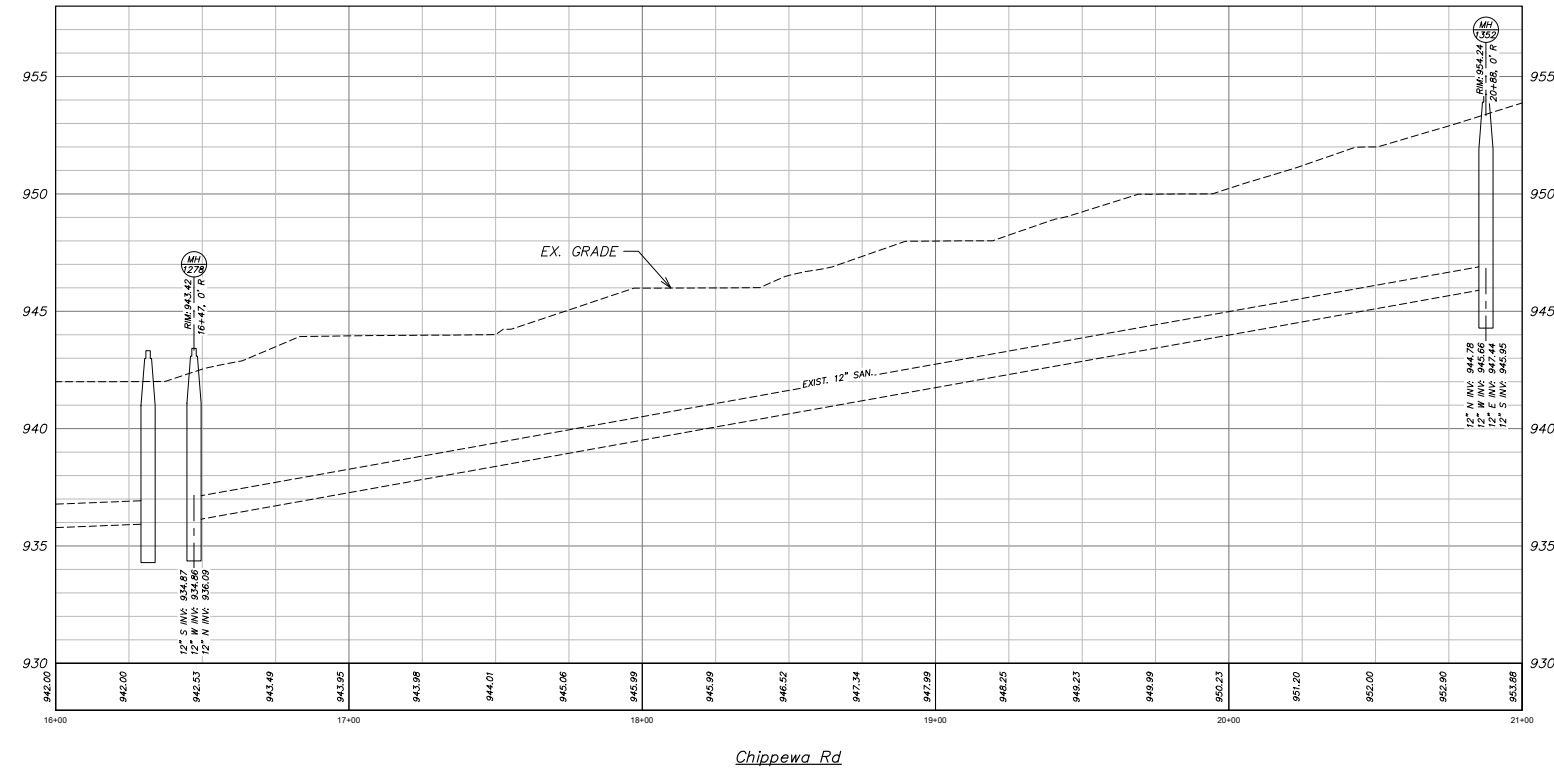
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Lazars, Alexandra



- LEGEND
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



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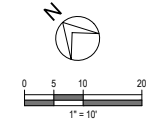
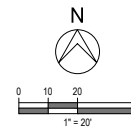
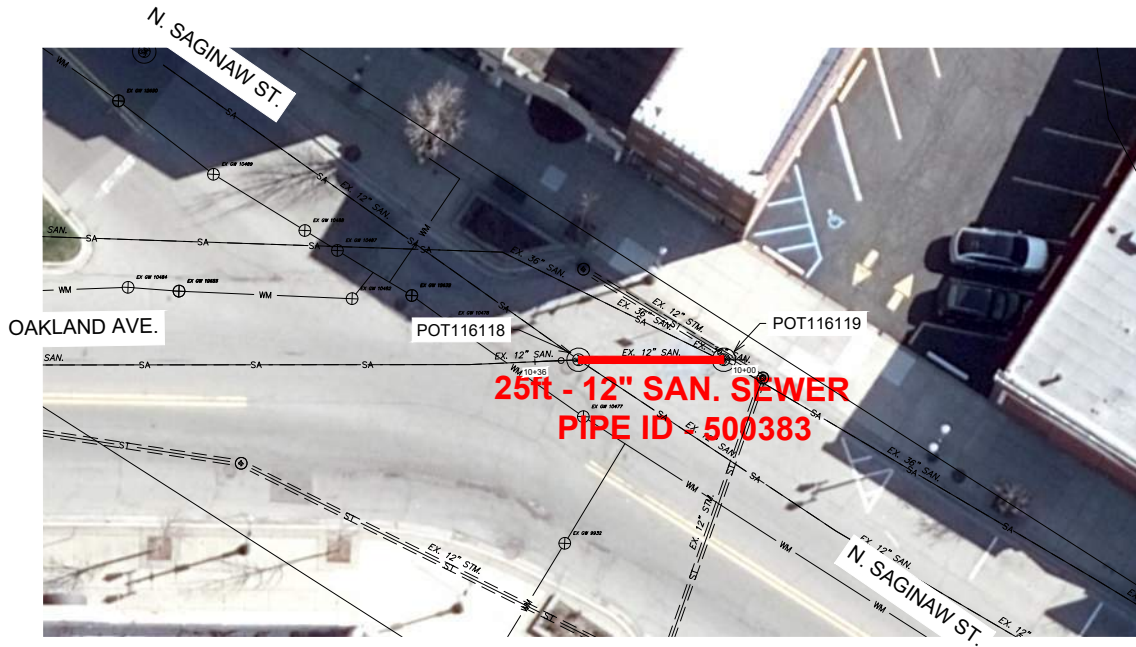
OAKLAND COUNTY WATER RESOURCES COMMISSIONER
CITY OF PONTIAC
SEWAGE DISPOSAL SYSTEM
FY2026 SRP
PIPE REPLACEMENTS

PIPE ID - 498601
SANITARY SEWER REPLACEMENT

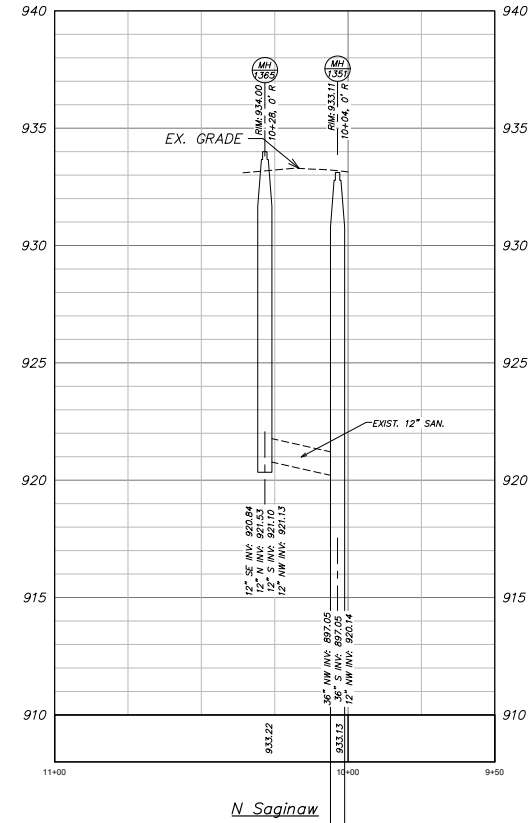
HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

ORIGINAL PLOT SIZE: ARCH FULL BLEED 0 (34.50 X 24.50 INCHES)

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- LEGEND**
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 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



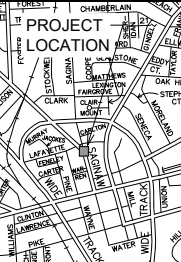
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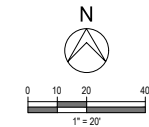
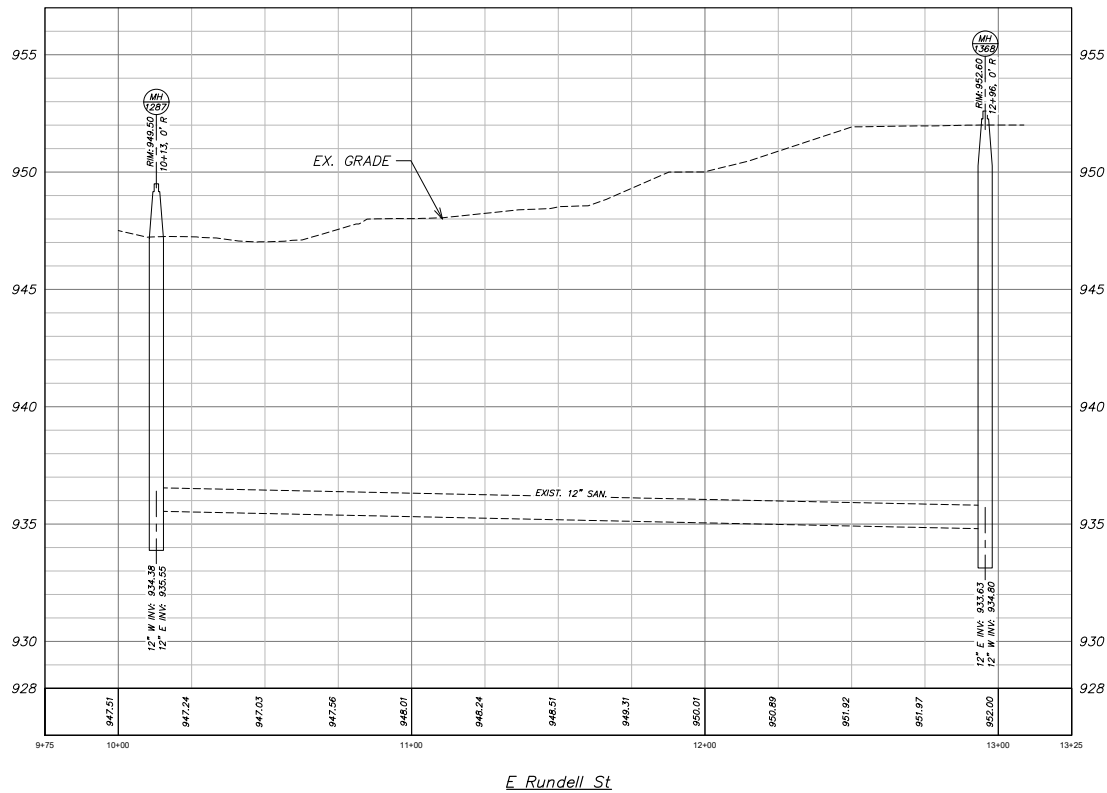


OAKLAND COUNTY WATER RESOURCES COMMISSIONER

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

PIPE ID - 500383
SANITARY SEWER
REPLACEMENT

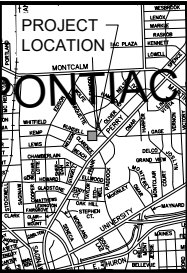
HRC JOB NO. 20240834	SCALE 1" = 10'
DATE FEBRUARY 2025	SHEET NO. C-XX



LEGEND	
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	EXISTING SANITARY SEWER AND STRUCTURES
	EXISTING WATERMAIN AND STRUCTURES
	EXISTING GAS MAIN
	SEWER REPLACEMENT



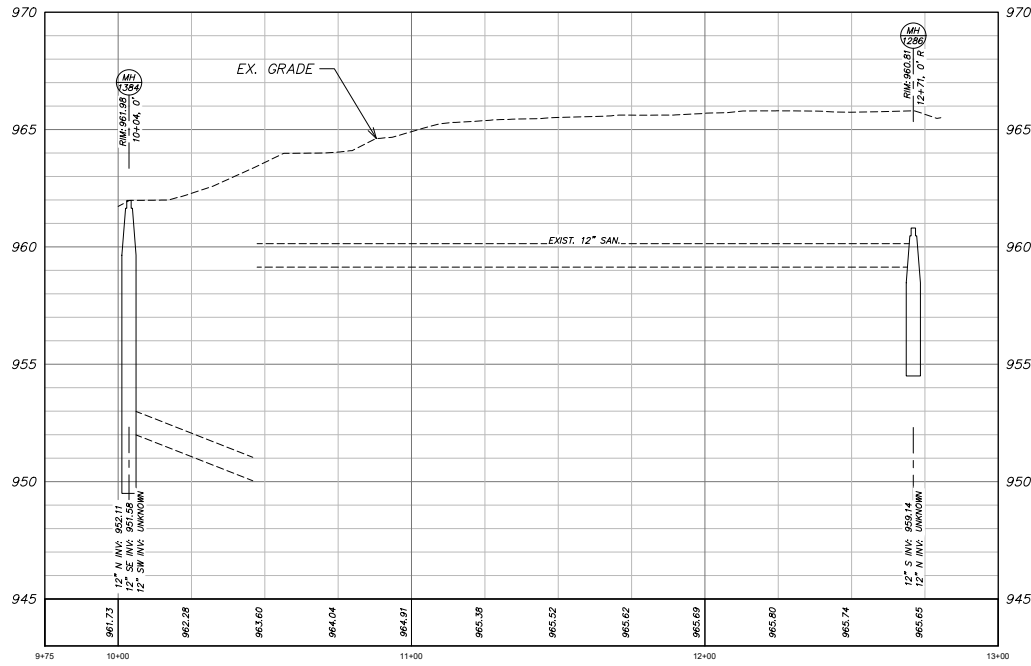
DATE	ADDITONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



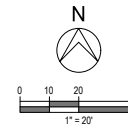
OAKLAND COUNTY WATER RESOURCES COMMISSION
CITY OF PONTIAC
SEWAGE DISPOSAL SYSTEM
FY2026 SRF
PIPE REPLACEMENTS

PIPE ID - 501391
SANITARY SEWER REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 10'
DATE FEBRUARY 2025	SHEET NO. C-XX OF



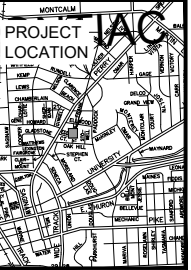
Omar St



LEGEND	
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	EXISTING WATERMAIN AND STRUCTURES
	EXISTING GAS MAIN
	SEWER REPLACEMENT



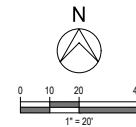
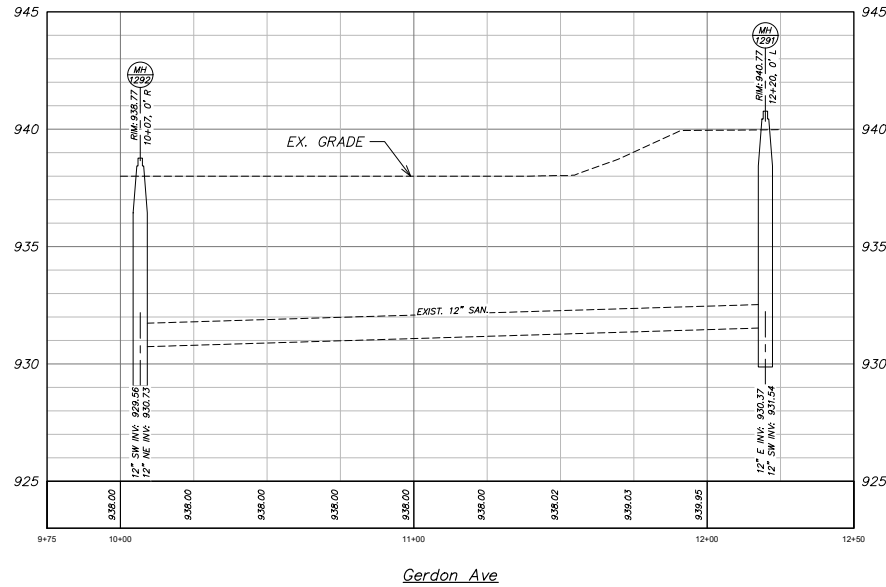
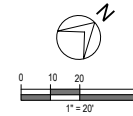
DATE	ADDITONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



OAKLAND COUNTY WATER RESOURCES COMMISSION
CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRP
PIPE REPLACEMENTS

PIPE ID - 501577
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 10'
DATE FEBRUARY 2025	SHEET NO. C-XX



- LEGEND
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



HRC
HUDDELL, ROTH & CLARK, INC.
CONSULTING ENGINEERS SINCE 1916
155 HULET DRIVE P.O. BOX 824
BLOOMFIELD HILLS, MICH. 48303 - 0824
PHONE: (248) 454-6300
FAX (1st Floor): (248) 454-6312
FAX (2nd Floor): (248) 454-6309
WEB SITE: www.hrceng.com

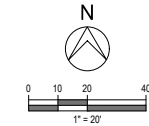
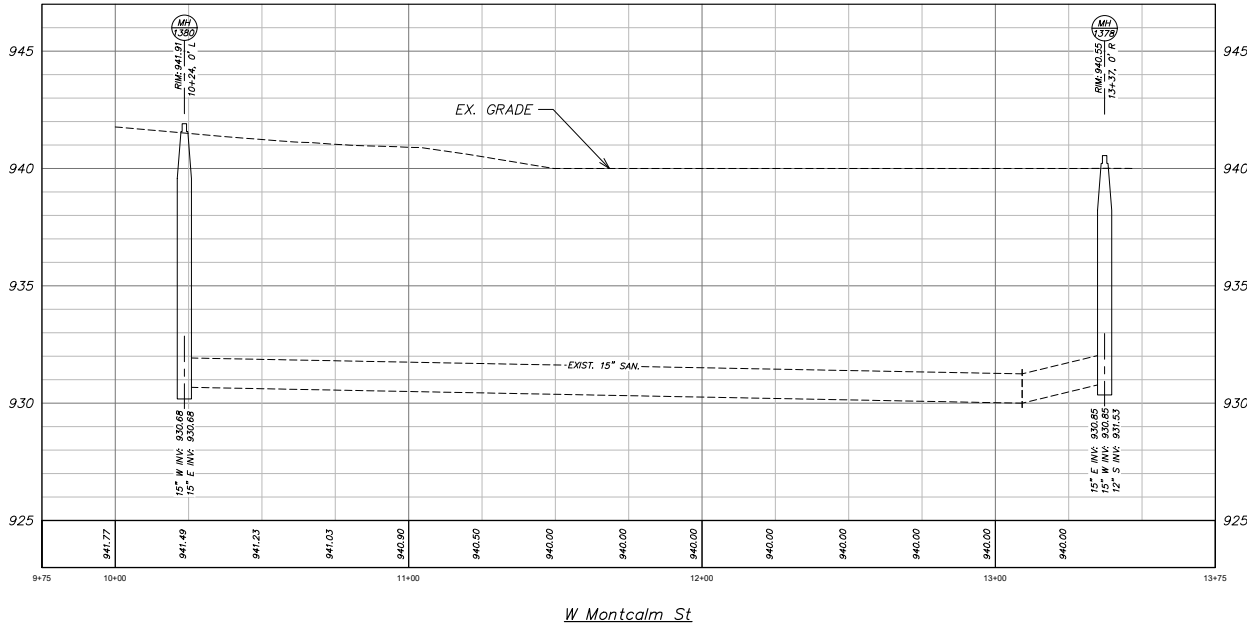
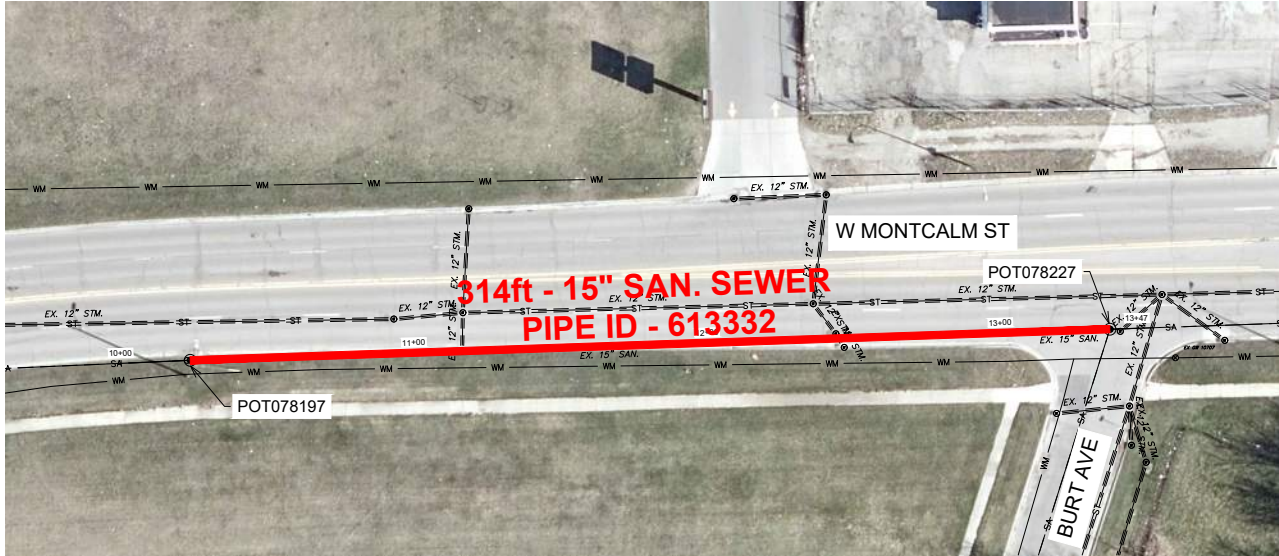
DATE	ADDITIONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



OAKLAND COUNTY WATER RESOURCES COMMISSION
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

**PIPE ID - 503299
SANITARY SEWER
REPLACEMENT**

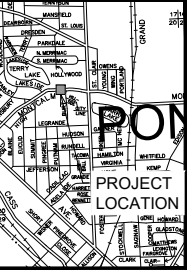
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DATE FEBRUARY 2025	SHEET NO. C-XX



- LEGEND
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 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT



DATE	ADDITONS AND/OR REVISIONS
DESIGNED S.L.D.	
DRAWN T.E.W.-A.S.L.	
CHECKED S.L.D.	
APPROVED D.W.M.	

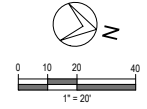


OAKLAND COUNTY WATER RESOURCES COMMISSIONER

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

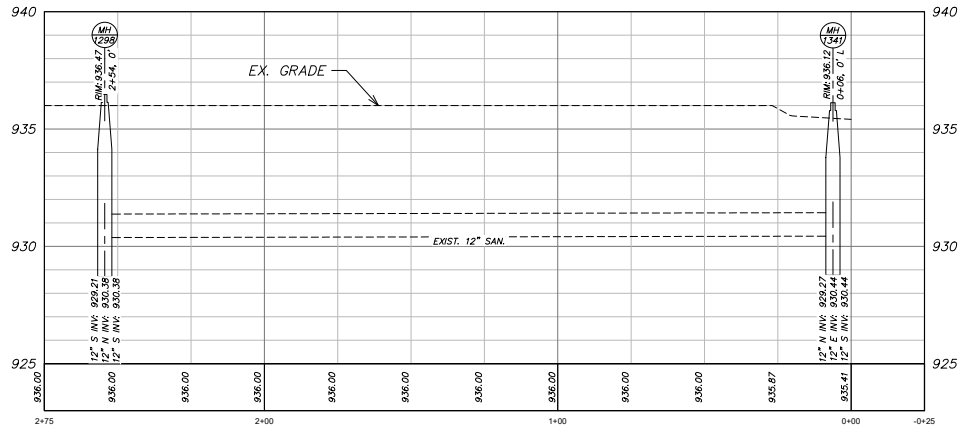
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REPLACEMENT**

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX



LEGEND

- EXISTING STORM SEWER AND STRUCTURES
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- EXISTING GAS MAIN
- SEWER REPLACEMENT

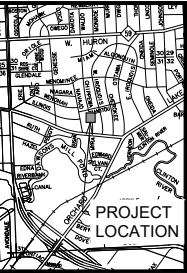


Alignment - S Chippewa



HRC
HUBBELL, ROTH & CLARK, INC.
CONSULTING ENGINEERS SINCE 1916
155 HULEY DRIVE
BLOOMFIELD HILLS, MICH. P.O. BOX 824
48302 - 0824
PHONE: (248) 454-6300
FAX (1st Floor): (248) 454-6312
FAX (2nd Floor): (248) 454-6309
WEB SITE: www.hrcengr.com

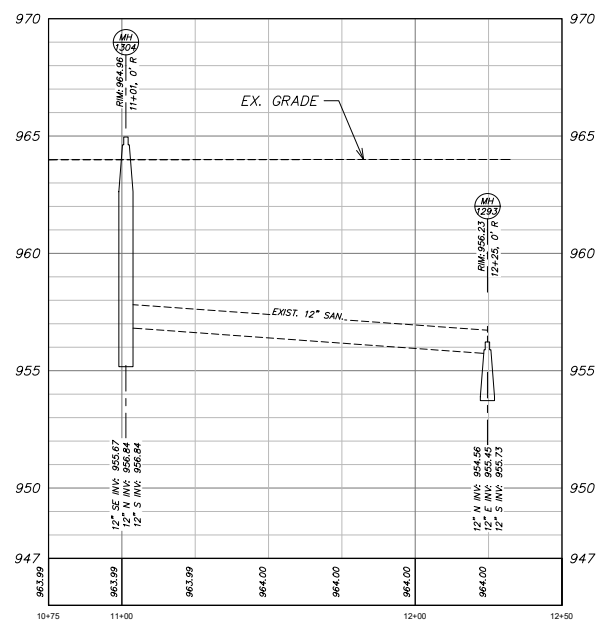
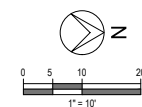
DATE	ADDITONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W.-A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



OAKLAND COUNTY WATER RESOURCES
COMMISSIONER
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

PIPE ID - 613647
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX OF

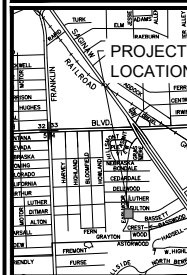
Earlmoor Blvd

LEGEND

-
- EXISTING STORM SEWER AND STRUCTURES
 - EXISTING SANITARY SEWER AND STRUCTURES
 - EXISTING WATERMAIN AND STRUCTURES
 - EXISTING GAS MAIN
 - SEWER REPLACEMENT

[illegible]

DATE	ADDITIONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W. - A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.

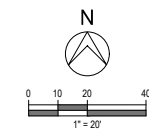


**OAKLAND COUNTY WATER RESOURCES
COMMISSIONER**

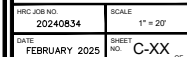
**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

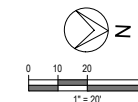
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REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 10'
DATE FEBRUARY 2025	SHEET NO. C-XX

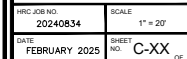


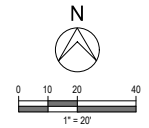
ORIGINAL PLOT SIZE: ARCH FULL BLEED D (36.00 X 24.00 INCHES)






 EXISTING STORM SEWER AND STRUCTURES
 EXISTING SANITARY SEWER AND STRUCTURES
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 EXISTING GAS MAIN
 SEWER REPLACEMENT

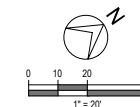






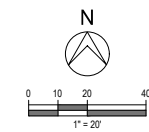
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- SEWER REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX OF




 EXISTING STORM SEWER AND STRUCTURES
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 EXISTING WATERMAIN AND STRUCTURES
 EXISTING GAS MAIN
 SEWER REPLACEMENT

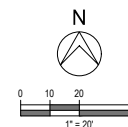
SHEET NO. C-XX



LEGEND

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	EXISTING GAS MAIN
	SEWER REPLACEMENT

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HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

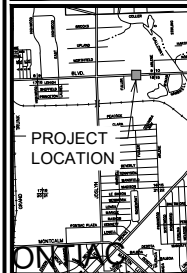


LEGEND


 EXISTING STORM SEWER AND STRUCTURES
 EXISTING SANITARY SEWER AND STRUCTURES
 EXISTING WATERMAIN AND STRUCTURES
 EXISTING GAS MAIN
 SEWER REPLACEMENT

[illegible]

DATE	ADDITIONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W. - A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



**OAKLAND COUNTY WATER RESOURCES
COMMISSIONER**

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

PIPE ID - 511129
SANITARY SEWER
REPLACEMENT

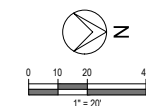
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20240834

DATE
FEBRUARY 2025

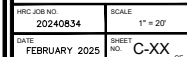
SCALE
1" = 20'

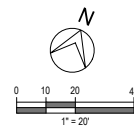
5 SHEET NO. C-XX

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 EXISTING STORM SEWER AND STRUCTURES
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 EXISTING WATERMAIN AND STRUCTURES
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 SEWER REPLACEMENT



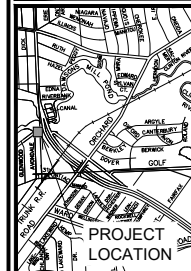


LEGEND

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 EXISTING SANITARY SEWER AND STRUCTURES
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 EXISTING GAS MAIN
 SEWER REPLACEMENT

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DATE	ADDITIONS AND/OR REVISIONS
DESIGNED	S.L.D.
DRAWN	T.E.W. - A.S.L.
CHECKED	S.L.D.
APPROVED	D.W.M.



**OAKLAND COUNTY WATER RESOURCES
COMMISSIONER**

**CITY OF PONTIAC
SEWAGE DISPOSAL
SYSTEM
FY2026 SRF
PIPE REPLACEMENTS**

PIPE ID - 661678
SANITARY SEWER
REPLACEMENT

HRC JOB NO. 20240834	SCALE 1" = 20'
DATE FEBRUARY 2025	SHEET NO. C-XX

Appendix G — Consent Judgement

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



MIKE COX
ATTORNEY GENERAL

P.O. Box 30755
LANSING, MICHIGAN 48909

August 4, 2009

Clerk of the Court
Ingham County Circuit Court
P O Box 40771
Lansing, MI 48901

Dear Clerk of the Court:

Re: *MDEQ v City of Pontiac*
Ingham County Circuit Court No. 06-1465-CE

Enclosed for filing in the above captioned case is a Proof of Service showing service of the signed Consent Judgment upon counsel.

Very truly yours,

A handwritten signature in cursive script, reading "John C. Scherbarth".

John C. Scherbarth
Assistant Attorney General
Environment, Natural Resources,
and Agriculture Division
(517) 373-7540

JCS/ajy
Encs.

c: Counsel of Record
Ronda Wuycheck

enra:2006019291:Pontiac:02LtrClerk

WATER BUREAU

AUG 06 2009

FIELD OPERATIONS
DIVISION

STATE OF MICHIGAN
IN THE 30TH JUDICIAL CIRCUIT
COUNTY OF INGHAM

MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY, and
STEVEN E. CHESTER, Director of the
Michigan Department of Environmental
Quality,

Docket No. 06-1465-CE

Hon. JAMES R. GIDDINGS

Plaintiffs,

v.

CITY OF PONTIAC,
A Michigan Municipal Corporation

Defendant.

PROOF OF SERVICE

On August 4, 2009, I sent by first-class mail a true, signed copy of the Consent Judgment
to:

WILLIAMS ACOSTA, PLLC
Avery K. Williams
Sarah D. Lile
535 Griswold Street, Suite 1000
Detroit, Michigan 48226-3692

I declare that the statements above are true to the best of my knowledge, information and
belief.



Anna Yott

STATE OF MICHIGAN
IN THE 30TH JUDICIAL CIRCUIT
COUNTY OF INGHAM

MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY, and
STEVEN E. CHESTER, Director of the
Michigan Department of Environmental
Quality,

Plaintiffs,

v.

CITY OF PONTIAC,
A Michigan Municipal Corporation

Defendant.

Docket No. 06-1465-CE

Hon. JAMES R. GIDDINGS

John Scherbarth (P28865)
Assistant Attorney General
Attorney for the Plaintiffs
Environment, Natural Resources, and
Agriculture Division
P.O. Box 30755
Lansing, Michigan 48909
(517) 373-7540

WILLIAMS ACOSTA, PLLC
Avery K. Williams (P34731)
Sarah D. Lile (P36553)
Attorneys for the Defendant
535 Griswold Street, Suite 1000
Detroit, Michigan 48226-3692
(313-963-3873)

CONSENT JUDGMENT

At a session of said Court, held in the courthouse, in the City
of Lansing, County of Ingham, and State of Michigan on

Judy 24 2009
PRESENT: Hon. James R. Giddings
Circuit Court Judge

This matter having come on before the Court upon the Parties' agreement to enter this
Consent Judgment to resolve the matters raised by the Michigan Department of Environmental
Quality in the Complaint in the above-entitled cause and to establish conditions wherein the City
of Pontiac will complete specified activities pursuant to Part 31 of the Natural Resources and

Environmental Protection Act (NREPA) and the Court being otherwise fully advised in the premises;

The Michigan Department of Environmental Quality ("MDEQ") and Steven E. Chester ("Chester") (collectively "Plaintiffs") and the City of Pontiac ("City" or "Defendant") (collectively Plaintiffs and Defendant are the "Parties") agree that settlement of this action is in the public interest and consent to the entry of this Consent Judgment ("Judgment"), without further litigation, as the most appropriate means of resolving the allegations raised by Plaintiffs in the Complaint filed with the Court on November 17, 2006. As evidenced by the signatures below, the Parties agree to, and shall be bound by, the terms of this Judgment.

Neither the execution nor entry of this Judgment shall be construed as an admission or a denial of liability by the Defendant with respect to any issue dealt with in this Judgment or an admission or denial of any factual allegations or legal conclusions stated or implied herein.

This Judgment requires the completion of specified activities by Defendant pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); MCL 324.3101 et seq., at Defendant's Municipal Corporation located at 47450 Woodward Avenue, Pontiac, Oakland County, Michigan 48342, that is the subject of the Complaint.

NOW, THEREFORE, before the taking any testimony, without trial of any issue of fact or law, and upon the consent of the Parties, by their attorneys, it is hereby ORDERED, ADJUDGED AND DECREED:

I. JURISDICTION AND VENUE

A. This Court has jurisdiction over the subject matter under Section 711 and 715 of the Revised Judicature Act (RJA), MCL 600.711 and MCL 600.715, and has subject matter jurisdiction pursuant to MCL 324.3115(1) and Section 605 of the RJA, MCL 600.605. This

Court also has personal jurisdiction over the Defendant. For the purposes of this Judgment only, Defendant waives all objections and defenses that it may have with respect to the jurisdiction of the Court.

B. Venue is proper in this circuit under Section 1631 of the RJA, MCL 600.1631 and MCL 324.3115(1)

C. The Court determines that the terms and conditions of this Consent Judgment are reasonable, adequately resolve the environmental issues raised in the Complaint, and properly protect the interests of the people of the State of Michigan.

D. The Court shall retain jurisdiction over the Parties and subject matter of this action to enforce this Judgment and to resolve disputes arising under the same, including those that may be necessary for its construction, execution, or implementation.

II. PARTIES BOUND

A. Plaintiff, Michigan Department of Environmental Quality ("MDEQ") avers that it is a principal department within the Executive Branch of the State of Michigan pursuant to Executive Order 1995-18. The MDEQ is the state agency mandated to provide for the protection of the natural resources of the state from pollution, impairment, and destruction. MCL 324.101, MCL 324.301, MCL 324.501, and Executive Orders 1973-2, 1976-8, and 1995-18.

B. Plaintiff, Chester avers that he is the Director of the MDEQ as appointed by Governor Jennifer M. Granholm.

C. Defendant, city of Pontiac (City), is a Michigan Corporation. Defendant owns and operates a Wastewater Treatment Plant (WWTP) located at 155 North Opdyke Road, Pontiac, Michigan 48342, and provides sewerage service to the community. The City is authorized to discharge treated municipal wastewater from the WWTP to the Clinton River in accordance with effluent limitations, monitoring requirements and other conditions set forth in

the National Pollutant Discharge Elimination System (NPDES) Permit No. MI0023825, issued to the City by the MDEQ on September 19, 2001.

D. The provisions of this Consent Judgment shall be binding on the Parties, their officers, agents, successors and assigns. No change or changes in the ownership or other legal status of the Defendant, including, but not limited to, any transfer of assets or of real or personal property, shall in any way alter the Defendant's responsibilities, agreement and obligations under this Judgment unless expressly agreed to by the MDEQ as an amendment to this Judgment. Defendant shall provide the MDEQ with written notice prior to the transfer of ownership of part or all of the Property and shall also provide a copy of this Judgment to any subsequent owners or successors prior to the transfer of any ownership rights.

E. Defendant shall provide a copy of this Judgment to all contractors, subcontractors, and consultants that are retained to conduct any portion of the compliance activities to be performed pursuant to this Judgment, and to the employees overseeing environmental management of the Property, within three calendar days of the effective date of such retention.

F. Notwithstanding the terms of any contract(s) that Defendant may enter with respect to the compliance activities to be performed pursuant to this Judgment, Defendant is responsible for compliance with the terms of this Judgment and shall ensure that its contractors, subcontractors, consultants, and employees perform all compliance activities in full conformance with the terms and conditions of this Judgment.

III. STATEMENT OF PURPOSE

A. In entering into this Judgment, it is the mutual intent of the Parties that Defendant will do the following

- I. Prevent unlawful discharges to waters of the state;

2. Assure compliance with the terms and conditions of any duly effective NPDES permit issued by the MDEQ to the City for activities conducted at the Property;
3. Partially reimburse Plaintiff for Costs of Surveillance and Enforcement as well as for reasonable attorney's fees.
4. Pay civil penalties as set forth in this Judgment and in the future pay stipulated penalties as provided by this Judgment where applicable.
5. Provide for the loss of natural resources alleged in the Complaint as set forth in this Judgment.

IV. DEFINITIONS

- A. "Effective Date" means the date that the Court enters this Judgment.
- B. "Enhanced Sewer System Evaluation Survey" means strategic sewer system evaluation surveys, survey activities to locate and quantify I/I sources that includes focus on residential and commercial downspouts, statistically measured footing drain flows, capacity analysis modeling based on I/I control alternatives, development of technically sound alternatives that include public involvement report with the intent to achieve a more accurate and dependable final Sewer System Evaluation Survey to address the goals and objectives set forth in Paragraph I of this section.
- C. "I/I" means inflow and infiltration.
- D. "Party" means the Plaintiffs or Defendant. "Parties" means the Plaintiffs and Defendant.
- E. "Phase I Corrective Action Program" means those cost-effective measures intended to rehabilitate the collection system by reducing I/I, set forth in MDEQ's Sanitary

Sewer Overflow ("SSO") Policy Statement of 2002 and the Clarification Statement of 2003, into the collection system and includes disconnection of downspouts, disconnection of catch basins, and similar measures. Phase I Corrective Action does not include construction or reconstruction of the collection system or wastewater treatment plant improvements.

F. "Phase II Corrective Action Program - Wastewater Collection System Analysis and Rehabilitation Program" means identification and construction of relief sewers, storage, and disconnection of any additional conductors of storm water to reduce I/I as required by MDEQ's Sanitary Sewer Overflow ("SSO") Policy Statement of 2002 and the Clarification Statement of 2003.

G. "Project Performance Certification Program" means a flow monitoring report and analysis that verify certification that the wastewater treatment plant and collection system will convey and treat the MDEQ approved weather designed event eliminating SSOs consistent with the 2002 Sanitary Sewer Overflow Policy Statement and the 2003 Clarification Statement.

H. "Property" means the location where the Defendant owns and operates a Wastewater Treatment Plant (WWTP) located at 155 North Opdyke Road, Pontiac, Michigan 48342, and provides sewerage service to the community. It also includes locations where the City is authorized to discharge treated municipal wastewater from the WWTP to the Clinton River in accordance with effluent limitations, monitoring requirements and other conditions set forth in the National Pollutant Discharge Elimination System (NPDES) Permit No. MI0023825, issued to the City by the MDEQ on September 19, 2001.

I. "Sewage System Evaluation Survey" means investigation of public and private infrastructure that is connected to the collection system, including but not limited to downspouts, catch basins, manholes and sewers, footing drains, laterals, bulkheads, for disconnection, defects,

or leaks to reduce I/I. The survey also includes flow monitoring data, rainfall simulation, I/I estimates and a plan for cost-effective I/I removal and/or storage intended to provide the basis for a plan which will lead to certification that the wastewater treatment plant and the collection system will meet the standards the set forth by MDEQ for a 25-year - 24-hour storm event consistent with the department's 2002 Sanitary Sewer Overflow (SSO) Policy Statement and the 2003 Clarification Statement.

J. "WWTP" means wastewater treatment plant.

K. "Water Bureau" or "WB" means the Water Bureau of the MDEQ and any successor entities charged with implementing Part 31 of the NREPA.

L. Unless otherwise defined herein, all terms used in this document, which are defined in pertinent parts of the NREPA and associated administrative rules and/or permits or the federal Clean Water Act, shall have the same meaning in this document as in those pertinent parts, rules, and/or permits.

V. COMPLIANCE WITH STATE AND FEDERAL LAWS

All actions required to be taken pursuant to this Judgment shall be undertaken in accordance with the requirements of all applicable or relevant and appropriate state and federal laws, rules, and regulations including the procurement of all necessary permits and approvals.

VI. COMPLIANCE PROGRAM

A. The City shall provide for proper containment and storage facilities for any and all polluting materials at the WWTP in accordance with Part II.D.6 of its NPDES permit requirements and any and all applicable laws, rules and regulations.

B. The City shall continue work efforts in its collection and/or treatment systems to identify and reduce sources of excessive I/I in the collection system to eliminate sanitary sewer overflows (SSOs) from the collection system and bypasses at the WWTP, consistent with the

MDEQ's current SSO Policy dated December 27, 2002, and the MDEQ SSO Clarification Statement dated October 23, 2003 (Attachment A) until such time as the City certifies to the MDEQ in accordance with Paragraph D of this section.

1. For flows entering the collection system, there will be no raw or partially treated sewage bypasses/SSOs in the collection system and at the WWTP at less than the 25-year - 24-hour storm event (3.9 inches of rain in a 24-hour period using SCS Type II rainfall distribution) using growth conditions (April 1 – October 31) and normal soil moisture, consistent with the Department's current SSO Policy and Clarification Statement, and
2. Peak hour hydraulic loading at system design flows are within the transportation capacity of the collection system and treatment capacity of the WWTP.

C. The City shall continue to implement the MDEQ reviewed and approved first phase of the Wastewater Collection System Analysis and Rehabilitation Program (Phase I Corrective Action Program (CAP)). The Phase I CAP shall include a full capacity analysis of the entire collection system with associated I/I reduction and sewer rehabilitation. Phase I CAP shall include the following schedule of compliance dates:

1. On or before September 1, 2009, the City shall submit to the MDEQ for review and approval a final combined report for the Sewer System Evaluation Survey (SSES) and Enhanced SSES.

2. On or before November 1, 2009, the City shall submit to MDEQ for review and approval a basis of design for the rehabilitation work in accordance with the SSES and Enhanced SSES final report.
3. On or before June 1, 2010, the City shall submit to the MDEQ for review and approval final plans and specifications consistent with the MDEQ approved basis of design.
4. On or before November 1, 2010, the City shall commence construction for rehabilitation work in accordance with the MDEQ approved final plans and specifications.
5. On or before November 1, 2012, the City shall complete construction for rehabilitation work in accordance with the final MDEQ approved plans and specifications.
6. On or before January 1, 2013, the City shall submit to the MDEQ for review and approval a work plan for conducting a Project Performance Certification (PPC) Program in the collection system and at the WWTP.
7. On or before April 1, 2013, the City shall commence the PPC Program in accordance with the MDEQ approved work plan.

8. On or before September 1, 2014, the City shall complete the PPC Program in accordance with the MDEQ approved work plan and submit an evaluation report. The report shall include additional flow monitoring necessary to demonstrate the effectiveness of implemented control measures.

9. Upon MDEQ approval, all submittals in subsection C. 1. through 8. shall be incorporated in this judgment by reference and enforceable hereunder.

D. Subject to Paragraph E of this section, on or before October 1, 2014, the City shall certify to the MDEQ there shall not be SSOs and bypasses in the collection system and at the WWTP as set forth in Paragraph B of this section.

E. In the event that the Phase 1 CAP improvements do not allow the City to certify that the threat of future SSOs and bypasses in the collection system and at the WWTP are eliminated as set forth in Paragraph B of this section, the City shall submit to the MDEQ for review and approval a second phase of the Wastewater Collection System Analysis and Rehabilitation Program (Phase 2 CAP) no later than February 1, 2015. The Phase 2 CAP shall include the following schedule of compliance dates:

1. On or before March 1, 2015, the City shall submit to the MDEQ for review and approval a basis of design consistent with the approved Phase 2 CAP.
2. On or before March 1, 2016, the City shall submit to the MDEQ an administratively complete Part 41 permit application along with

approvable final plans and specifications consistent with the MDEQ approved basis of design.

3. On or before August 1, 2016, the City shall commence construction in accordance with the approved final plans and specifications.
4. On or before June 1, 2018, the City shall complete construction in accordance with the issued Part 41 permit and MDEQ approved final plans and specifications.
5. On or before September 1, 2018, the City shall submit to the MDEQ for review and approval a work plan for conducting a PPC Program in the collection system and at the WWTP.
6. On or before January 1, 2019, the City shall commence the PPC Program in accordance with the MDEQ approved work plan.
7. On or before January 1, 2020, the City shall complete the PPC Program in accordance with the MDEQ approved work plan and submit an evaluation report. The report shall include additional flow monitoring necessary to demonstrate the effectiveness of implemented control measures.
8. Upon MDEQ approval, all submittals in subsection E. 1. through 8. shall be incorporated in this judgment by reference and enforceable hereunder.

F. On or before March 1, 2020, the City shall submit to the MDEQ the Phase 2 CAP certification that there shall not be SSOs and bypasses in the collection system and at the WWTP as set forth in Paragraph B of this section.

VII. EMERGENCY RESPONSE

A. In the event of a discharge to surface waters or other spill of polluting materials to the ground or water attributable to Defendant's activities, Defendant shall undertake the following measures:

1. Upon the discovery of a discharge of any waste, wastewater, or other spill of polluting materials to the ground or water, Defendant shall take immediate corrective measures to contain any losses of waste, wastewater, or other polluting material to prevent any further discharge or spill to waters of the state.
2. Defendant shall immediately upon discovery of any discharge of waste, wastewater, or other polluting material to surface waters of the state notify the WB Southeast Michigan District Office. Emergency notification shall be as follows:
 - a. Monday through Friday, during the hours of 8:00 AM to 5:00 PM, contact the MDEQ WB Southeast Michigan District Office at 586-753-3700.
 - b. at all other times, contact the Pollution Emergency Alerting System (PEAS) Hotline at 800-292-4706.
3. In addition to the verbal notification requirement above, Defendant shall provide written notification to the WB Southeast Michigan District Office Supervisor and the Chief of WB Enforcement Unit within ten calendar

days following the discovery of any discharge of waste, wastewater, or other spill of polluting materials to the ground or water. The written notification shall include:

- a. a description and cause of the discharge or other spill, including an estimate of the discharge volume, and any analytical data in the possession of the Defendant related to the discharge or spill;
- b. the estimated duration of the discharge or other spill, including the date and time of the commencement and cessation of the discharge to the extent known;
- c. the corrective measures that were or will be implemented to prevent a future occurrence; and
- d. copies of all pertinent records maintained pursuant to Section IX. of this Judgment.

VIII. REPORTING

A. Defendant shall verbally report any violation of this Judgment, excluding discharges to surface waters or spill of any polluting materials to the ground or water reported in accordance with Section VII above, to the WB Southeast Michigan District Office Supervisor not later than the close of the next business day following detection of such violation, and shall provide a written report within fourteen business days after detection of such violation to both the WB Southeast Michigan District Office Supervisor and the Chief of the WB Enforcement Unit. The written report shall include a detailed description of the violation, the precise cause or causes of the violation, a detailed description of any action taken or proposed to correct the violation, and a schedule for the implementation of any proposed corrective action. Defendant shall report any anticipated violation of this Consent Judgment to the MDEQ, WB, Southeast

Michigan District Office Supervisor in advance of the relevant deadlines whenever reasonably practicable.

IX. RECORD RETENTION AND ACCESS TO INFORMATION

A. Until five years after the termination of this Judgment, Defendant shall retain, and shall instruct its contractors, agents, and representatives to preserve, all non-identical copies of records and documents, including records or documents in electronic form, that this Judgment requires Defendant to create or maintain.

B. Upon MDEQ request, Defendant shall provide to the MDEQ copies of all documents and information within the possession or control of Defendant, its employees, contractors, agents, or representatives that this Judgment requires Defendant to create or maintain. Defendant shall not prevent its employees, contractors, agents, or representatives from discussing with MDEQ any relevant facts, except for privileged information, concerning the performance of activities undertaken pursuant to this Judgment.

C. This Judgment in no way limits or affects any right to obtain information held by the MDEQ pursuant to applicable laws, regulations, or permits, nor does it limit or affect any duty or obligation of Defendant to maintain records or information imposed by applicable laws, regulations, or permits.

X. ACCESS

A. Upon the Effective Date of this Judgment and to the extent of the property covered by this Judgment is owned, controlled by, or available to Defendant or successors in interest, the MDEQ as well as its authorized employees, contractors and consultants shall, upon presentation of proper credentials, have access at all reasonable times to the Property for the purpose of conducting any activity for which access is required for the implementation of this

Judgment or the continued evaluation of Defendant's compliance with Part 31 of the NREPA, including, but not limited to:

1. Monitoring activities taking place pursuant to this Judgment;
2. Verifying any data or information submitted to the MDEQ;
3. Conducting investigations relating to discharges of potentially injurious substances at or from the Property;
4. Obtaining samples;
5. Assessing the need for corrective action or other response activities at or near the Property;
6. Assessing pollution control structures to assure the effectiveness and integrity of the structure(s);
7. Inspecting and copying non-privileged records, inspection logs, contracts and other documents maintained pursuant to this Judgment;
8. Communicating with Defendant, Defendant's personnel, representatives, or consultants for the purpose of assessing compliance with this Judgment;
9. Determining whether the Property is being used in a manner that is prohibited or restricted, or that may need to be prohibited or restricted, by or pursuant to this Judgment or Part 31 of the NREPA;
10. Assuring the protection of public health, safety, and welfare and the environment; and
11. Conducting tests and inspections pursuant to Part 31 of the NREPA.

B. To the extent that property where activities are performed by the Defendant under this Judgment is owned or controlled by persons other than Defendant, Defendant shall use its

reasonable best efforts to secure from such persons access for the Parties and their authorized employees, contractors and consultants. Defendant shall provide the MDEQ with a copy of each access agreement secured pursuant to this section. For purposes of this paragraph, "best efforts" includes, but is not limited to, providing reasonable consideration to the owner.

XI. NOTICES

A. Except where this Judgment already identifies the persons to whom a document or information is to be submitted, any submittal, notice, report, documentation, or recitation required by this Judgment shall be submitted to the attention of:

For Plaintiffs: Phil Argiroff
Southeast Michigan District Office Supervisor

and

Barry Selden
WB Field Operations Enforcement Unit Chief
525 West Allegan Street
P.O. Box 30273
Lansing, Michigan 48909-7773
517-373-6437

For Defendant: Mr. Allan Schneck
Director of Public Works
55 Wessen
Pontiac, Michigan 48342

Either party may substitute others for those designated to receive such notices by providing written notice to the other party.

XII. FORCE MAJEURE

A. Defendant shall perform the requirements of this Judgment within its time limits, unless events, which constitute a Force Majeure, prevent or delay performance or unless the WB Chief grants an extension pursuant to Paragraph G of this section.

B. Any performance delay attributable to a Force Majeure shall not be deemed a violation of Defendant's obligations under this Judgment in accordance with this section. For this Judgment's purpose, Force Majeure means an occurrence or non-occurrence of the requirements under this Judgment arising from causes beyond the control of Defendant and for which Defendant is without fault for the occurrence or non-occurrence, including, but not limited to: an act of God; untimely review by the MDEQ of submissions required under this Judgment; and the acts or omissions of a third party not under contractual obligations to Defendant that could not have been avoided or overcome through Defendant's due diligence and that resulted in a delay of performance of an obligation under this Judgment. Force Majeure does not include, among other things, unanticipated or increased costs, changed financial circumstances (including a failure to obtain funding), or failure to apply for a permit or license as a result of Defendant's action or omission.

C. Defendant shall telephone the WB Southeast Michigan District Office Supervisor within 48 hours of discovering any event, which causes a delay in its compliance with any provision of this Judgment. Verbal notice shall be followed by written notice to both the WB Southeast Michigan District Office Supervisor and Chief of the WB Enforcement Unit within 10 calendar days and shall describe in detail the delay's anticipated length, the delay's precise cause or causes, the measures that Defendant has taken to prevent or minimize the delay, and the timetable by which those measures shall be implemented. Defendant shall use all reasonable measures to avoid or minimize any such delay.

D. Defendant's failure to comply with the notice requirements of Paragraph C of this section shall render the Force Majeure provisions of this section void as to the particular incident

involved. The MDEQ may, at its sole discretion and in appropriate circumstances, provide Defendant with a written waiver of the notice requirements of Paragraph C of this section.

E. If the parties agree that the delay or anticipated delay was beyond the control of Defendant, this may be so stipulated, and the parties may petition the Court for an appropriate Consent Judgment modification. Defendant bears the burden of proving that any delay was beyond its reasonable control, and of showing that Defendant has met the requirements under this section.

F. A denial by the WB Chief that an event constitutes a Force Majeure constitutes a final decision on the matter and is not subject to appeal and review by the court.

XIII. EXTENSION OF TIME TO PERFORM

A. Except as otherwise provided in Section XII, Paragraph B, in the absence of a Force Majeure, Defendant and the MDEQ agree that the WB Chief may, but in no circumstances is obligated to, grant Defendant an extension of the specified deadlines set forth in this Judgment. Any extension shall be preceded by a timely written request, received by the MDEQ no later than 10 business days prior to the pertinent deadline, which shall include:

1. An identification of the specific deadline that will not be met.
2. A detailed description of what will prevent Defendant from meeting the deadline.
3. A description of the measures Defendant has taken or intends to take to meet the required deadline.
4. The length of the extension requested and the specific date on which the obligation will be met.

B. The WB Chief shall respond promptly to such requests and shall not unreasonably withhold approval for such requests.

C. Any extension of the specified deadlines or other modifications and amendments of this Judgment shall be signed by both parties, shall have as their effective date the date on which they are signed by the WB Chief, and shall be incorporated into and become an enforceable part of this Judgment upon approval of the Court.

D. An extension of one compliance date based upon a particular incident does not mean that Defendant qualifies for an extension of a subsequent compliance date without providing proof that an extension to a separate requirement under this Judgment is justifiable.

XIV REIMBURSEMENT OF COSTS AND PAYMENT OF CIVIL FINES

A. Defendant shall pay to the State of Michigan **\$6,000.00** as partial compensation for the Costs of Surveillance and Enforcement, as well as attorney's fees, to resolve alleged past violations of Part 31 of the NREPA set forth in the Complaint.

B. Defendant shall to pay a civil penalty of **\$15,000.00** to resolve liability allegedly arising from past violations of Part 31 of the NREPA set forth in the Complaint.

C. Defendant shall pay **\$15,000.00** to be deposited into the natural resources damages fund for the alleged loss of natural resources as set forth in the Complaint.

D. Defendant shall pay such penalties and Costs of Surveillance and Enforcement by certified or cashier's checks made payable to the State of Michigan and mailed to the Michigan Department of Environmental Quality, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157 within 30 days of the Effective Date of this Judgment. To ensure proper credit, all payments made pursuant to this Judgment must include the Payment Identification Number **WTR-3108** on the face of the checks, or in the cover letter with the payments.

XV. STIPULATED PENALTIES

A. The Parties stipulate to the payment of stipulated fines by the Defendant in the following manner should violations of this Judgment occur:

5. Any failure to comply with any compliance date in this Judgment shall result in stipulated penalties as follows:

- a. \$200.00 for the first day of violation;
- b. \$300.00 for the second consecutive day of violation; and
- c. \$500.00 for the third consecutive day of violation and every consecutive day thereafter.

6. A failure by Defendant to comply with any other provisions of Section VI of this Judgment shall result in a stipulated penalty of \$250.00 per day, per violation.

B. All stipulated penalties shall be paid within 30 days of Defendant's receipt of a demand from the MDEQ. Demands for payment shall be sent via certified mail to ensure accuracy regarding the date of receipt. Failure to make any payment required under this Judgment by the specified deadline constitutes a separate violation of this Judgment and is subject to an interest penalty calculated in accordance with Section 600.6013 of the Revised Judicature Act; MCL 600.6013.

C. Defendant shall pay all stipulated penalties and interest penalties by certified or cashier's check made payable to the State of Michigan and mailed to the Michigan Department of Environmental Quality, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157. To ensure proper credit, all payments made pursuant to this Consent Judgment must include the Payment Identification Number **WTR-3108** on the face of the check, or in the cover letter with the payment.

D. Defendant agrees not to contest the legality of any stipulated penalty or interest penalty assessed under this section, but reserves the right to dispute the factual basis upon which MDEQ demands stipulated penalty or interest penalty.

E. Liability for or payment of stipulated penalty under this Judgment shall not preclude the MDEQ from seeking injunctive relief or other relief to which the MDEQ is entitled for Defendant's failure to comply with other specific requirements of this Judgment, or failure to comply with Part 31 of the NREPA or any other applicable law, except that Plaintiffs shall not seek additional monetary relief for any violations for which Plaintiffs have accepted stipulated penalty under this Judgment.

XVI. DISPUTE RESOLUTION

A. In accordance with Section XV, Paragraph D, Defendant may dispute the factual basis upon which MDEQ demands stipulated penalties as set forth below.

1. Defendant shall set forth in writing the basis for any factual dispute not later than 10 days following receipt of MDEQ's demand for payment as set forth in Section XV, Paragraph B. The written objections shall be addressed to the WB Southeast Michigan District Supervisor.
2. The Parties shall promptly engage in informal negotiations to resolve the dispute which may continue not more than 30 days.
3. In the event the parties cannot agree, the WB Southeast Michigan District Supervisor shall so state in writing setting forth the MDEQ's findings and resolution of the dispute. Defendant shall have 15 days to appeal the decision in writing and addressed to the WB, Field Operations Division Enforcement Unit Chief.

4. The WB Field Operations Division Enforcement Unit Chief shall promptly review the record and make a determination to accept, reject or modify the resolution of the District. The WB Field Operations Division Enforcement Unit Chief may, but is in no way obligated to, conduct an informal hearing between the parties to facilitate the decision-making process. The Resolution shall be stated in writing, setting forth MDEQ's findings and conclusions and delivered to the Defendant.
5. Upon receipt of the determination of the WB Field Operations Division Enforcement Unit Chief, the Defendant shall have 30 days to submit a written appeal to the Director of MDEQ. The Director of the MDEQ shall promptly review the record and make a written determination within 30 days to accept, reject or modify the determination of the WB Field Operations Division Enforcement Unit Chief.
6. The decision of the Director of the MDEQ shall be final and binding upon the Parties unless Defendant shall appeal such decision to this Court within 30 days of the Director's final decision. The appeal shall be made by motion and served upon the Plaintiffs in accordance with Michigan Rules of Civil Procedure and any local rules and orders of this Court.

B. All written documents referenced in paragraphs 1-6 above shall be delivered by certified mail or other private delivery method requiring verification of receipt.

XVII. RESERVATION OF RIGHTS

With respect to any violations not expressly addressed and resolved by this Judgment, the MDEQ reserves the right to pursue any other remedies to which it is entitled for any failure to comply with the requirements of any state or federal law, including the NREPA and its rules.

B. This Judgment does not limit the rights of the Defendant or the State of Michigan against any third parties.

XVIII. GENERAL PROVISIONS

A. Severability

Should a court of competent jurisdiction declare any provision of this Consent Judgment to be unenforceable, the remaining provisions shall remain in effect.

B. Modification

Any party to this Judgment may petition the Court for modification of this Judgment including its termination prior to expiration of the effective period. Any modification must be in writing and approved by the Court. No party may petition the Court for a modification of this Judgment without first having made a good faith effort to reach agreement with the other party on the terms of any such modification. The parties may petition the Court to modify any requirement or provision of this Judgment by mutual agreement or may modify this Judgment through a writing signed by authorized representatives of the Parties.

C. Other Laws

This Judgment in no way affects the Defendant's responsibility to comply with any other applicable state or federal laws or local regulations or with any order of this or any other Court including without limitation, any amendments to Part 31 of NREPA or its rules or regulations.

D. Settlement

This Judgment is in settlement and satisfaction of all civil claims against Defendant alleged by the MDEQ in the Complaint.

XIX. RETENTION OF JURISDICTION

Prior to termination of this Judgment in accordance with Section XVII. below, this Court shall retain jurisdiction over this action to modify or enforce the terms of this Judgment, assess disputed stipulated fines, resolve all other disputes arising under its terms, or to take any action necessary or appropriate for construction or implementation of this Judgment.

XX. TERMINATION

This Judgment shall terminate upon written request of Defendant and written approval from the MDEQ along with approval of this Court through the issuance of a Satisfaction of Judgment. The written request of Defendant shall include a certification by Defendant that it has (1) paid in full all fines and costs owed to the State of Michigan under this Judgment and (2) has not received a Notice Letter or other document from the MDEQ alleging a violation of Part 31 or this Judgment for three consecutive years. Provided that such certification is made and not reasonably disputed, the MDEQ will not withhold agreement to terminate this Judgment.

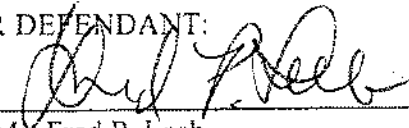
XXI. SEPARATE DOCUMENTS

This Judgment may be executed in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument. This Judgment may be executed in duplicate original

XXII. SIGNATORIES

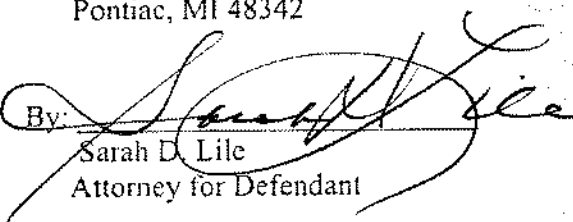
The signatories to this Judgment certify that they are authorized to execute this Judgment and to legally bind the Parties they represent to the requirements of this Judgment.

FOR DEFENDANT:

By: 

Mr. Fred P. Leeb
Emergency Financial Manager
Office of the Mayor - City of Pontiac
47450 Woodward Avenue
Pontiac, MI 48342

Dated: 6/25/09

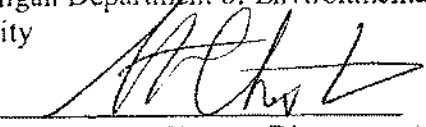
By: 

Sarah D. Lile
Attorney for Defendant

Dated: 6/29/09

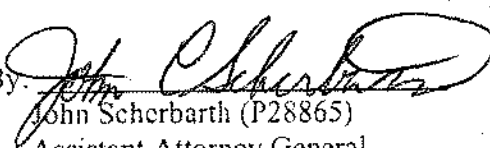
FOR PLAINTIFFS:

Michigan Department of Environmental
Quality

By: 

Steven E. Chester, Director

Dated: 7-21-09

By: 

John Scherbarth (P28865)
Assistant Attorney General
Michigan Department of Attorney General
Environment, Natural Resources, and
Agriculture Division

Dated: 7/10/09

IT IS SO ORDERED, ADJUDGED AND DECREED THIS 24 day of July, 2009.

JAMES R. GIDDINGS

Honorable James R. Giddings



HRC OFFICE LOCATIONS

Bloomfield Hills

555 Hulet Drive
Bloomfield Hills, MI 48302
(248) 454-6300

Delhi Township

2101 Aurelius Road, Suite 2
Holt, MI 48842
(517) 694-7760

Detroit

535 Griswold Street
Buhl Building, Suite 1650
Detroit, MI 48226
(313) 965-3330

Grand Rapids

1925 Breton Rd SE, Suite 100
Grand Rapids, MI 49506
(616) 454-4286

Howell

105 West Grand River Avenue
Howell, MI 48843
(517) 552-9199

Jackson

401 S. Mechanic Street, Suite B
Jackson, MI 49201
(517) 292-1295

Kalamazoo

834 King Highway, Suite 107
Kalamazoo, MI 49001
(269) 665-2005

Traverse City

1501 Cass Street
Traverse City, MI 49684
(231) 714-5007

Troy

629 E Elmwood Avenue
Troy, MI 48063
(248) 454-6300