Wastewater Operating Services
Industrial Waste Control
9300 W. Jefferson, Ste. 210
Detroit, Michigan 48209

CERTIFIED MAIL

February 10, 2020

Mr. David Favero
RACER Trust site
1505 Woodward Avenue, Suite 200
Detroit, MI 48226

Re: Renewal of Special Discharge Permit No. SD6-94508
Site: 12950 Eckles Road (RACER Trust site)
Livonia, MI 48150

Dear Mr. Favero:

Enclosed is your Special Discharge Permit issued by the Great Lakes Water Authority (GLWA) to discharge remediated groundwater from the above site into the GLWA sewer system. The GLWA based this permit on the data and other related information your company submitted to Industrial Waste Control Division.

Your permit contains specific discharge limitations, flow rate, self-monitoring and reporting requirements. The GLWA can rescind this permit at any time if the discharge shows noncompliance with the discharge limitations or if the GLWA determines that the effluent has an adverse effect on the Water Resource Recovery facility. Failure to comply with these terms and conditions may result in the immediate permit revocation and appropriate enforcement action.

Should you have any questions, please contact Ms. Tessy Jose, of the Permits Section, at (313) 297-5878.

Sincerely,

JBelen

Joe I. Belen, P.E.
Engineer
Industrial Waste Control Group

JB/TJ

GREAT LAKES WATER AUTHORITY
Industrial Waste Control Division
9300 West Jefferson, Suite 230
GLWA, Michigan 48209

SPECIAL DISCHARGE PERMIT NO.: SD6-94508

SECTION A: GENERAL INFORMATION

Facility I.D. No.:	94508
Company Name:	RACER Trust
Facility Address:	12950 Eckles Road Livonia, MI 48150
Mailing Address:	1505 Woodward Avenue, Suite 200 GLWA, MI 48226 Mr. David Favero 734-879-9525

The Great Lakes Water Authority ("GLWA") hereby authorizes RACER Trust (RACER Properties LLC) to discharge remediated groundwater from the said site into the GLWA sewer system. The GLWA grants this permit in accordance with the company's application and in conformity with plans, specifications, and other substantial data submitted to the GLWA.

All parameters listed in the permit must be analyzed. If there is a need to extend the permit, the company must submit a written request for an extension to the GLWA at least ninety (90) days before the permit's expiration date.

Effective Date: February 10, 2020

Expiration Date: December 31, 2022

Authorized by:

Joe I. Belen, P.E.
Engineer
Industrial Waste Control Division

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENT

1) Representative Sampling Location/Discharge Point

Sampling Location: Sample Port after carbon filter unit in treatment building

Discharge Point: MH located 42 feet N. of Amrhein Road and 320 feet E. of Eckles Road

The following parameters shall be analyzed and reported as per reporting requirements. (reported in mg/l unless otherwise indicated)

Parameter	Daily Max	Min Sampling Frequency
Acidity/Alkalinity (pH)	5-11.5 SU	1 per Month
Chromium (Cr)	2.77	1 per Month
Fats, Oil or Grease (FOG)	1500	1 per Month
Lead (Pb)	.69	1 per Month
Mercury (Hg)	Non-detect	1 per Month
Nickel (Ni)	3.98	1 per Month
Total PCB (PCB)	Non-detect	1 per Month
Total Suspended Solids (TSS)	7500	1 per Month
Zinc (Zn)	2.61	1 per Month
Toxic Organics(TTO) (see Attachment, p.7)	2.13	1 per year

Limitations are based on grab samples. All parameters must be analyzed according to methods outlined by EPA in 40 CFR Part 136.The toxic organics must be analyzed with detection limit of 10 ug/l or less. The detection limit must be indicated in the wastewater analytical report. Matrix interference must be specified where applicable.

Monitoring Requirements for Per- and Poly- fluoroalkyl Substances (PFAS)

Parameter	Requirement / Limit	Min Sampling Frequency
Perfluorobutanoic acid (PFBA)	Report	1 per Month
Perfluoropentanoic acid (PFPeA)	Report	1 per Month
Perfluorohexanoic acid (PFHxA)	Report	1 per Month
Perfluoroheptanoic acid (PFHpA)	Report	1 per Month
Perfluorooctanoic acid (PFOA)	Report	1 per Month
Perfluorononanoic acid (PFNA)	Report	1 per Month
Perfluorodecanoic acid (PFDA)	Report	1 per Month
Perfluoroundecanoic acid (PFUnDA)	Report	1 per Month
Perfluorododecanoic acid (PFDoDA)	Report	1 per Month
Perfluorotridecanoic acid (PFTrDA)	Report	1 per Month
Perfluorotetradecanoic acid (PFTeDA)	Report	1 per Month
Perfluorobutane Sulfonic acid (PFBS)	Report	1 per Month
Perfluoropentane Sulfonic acid (PFPeS)	Report	1 per Month
Perfluorohexane Sulfonic acid (PFHxS)	Report	1 per Month
Perfluoroheptane Sulfonic acid (PFHpS)	Report	1 per Month
Perfluorooctane Sulfonic acid (PFOS)	Report	1 per Month
Perfluorononane Sulfonic acid (PFNS)	Report	1 per Month
Perfluorodecane Sulfonic acid (PFDS)	Report	1 per Month
Perfluorooctane sulfonamide (FOSA)	Report	1 per Month
4:2 Fluorotelomer sulfonic acid (4:2 FTSA)	Report	1 per Month
6:2 Fluorotelomer sulfonic acid (6:2 FTSA)	Report	1 per Month
8:2 Fluorotelomer sulfonic acid (8:2 FTSA)	Report	1 per Month
N-Ethyl perfluorooctane sulfonamidoacetic acid (NEtFOSAA)	Report	1 per Month
N-Methyl perfluorooctane sulfonamide (N-MeFOSA)	Report	1 per Month

Analytical Requirement: US EPA Method 537 (modified) or ASTM D7979
The PFAS must be analyzed with detection limit of 10 ng/l or less.

2) Permit Definition

The site is the former Delphi Chassis Livonia Plant which was historically used for the production of vehicle bumpers, leaf springs and strut assemblies with Area 1 being used for chrome plating. The plant was demolished and since then there has been no categorical operation at the site. Historic operations of nickel and chrome plating of bumpers from 1954 to 1993 at this site have caused nickel and chromium contamination that impacted the groundwater. In 2004, the company installed soil-bentonite barrier wall around Area 1 to prevent offsite migration of contaminated groundwater. Since February 2010, the site was owned by Motor Liquidation Company. However, since 2011, RACER Trust took over the site and became responsible for all matters on the site.

In 2016, company started full scale In-situ chromium reduction on site. Until October 2018, the groundwater was being treated by collecting it along south boundary of the site in a French drain collection system and then pumping it, through bag filters, into a treatment system which consists of metals precipitation, clarification, final pH adjustment and sand filtration. Since January 2018, the influent concentrations for nickel and chromium have been consistently lower than permit limitations and hence per company's request, GLWA authorized the company to eliminate treatment steps for metals precipitation, clarification and final pH adjustment and just pass the groundwater through sand filtration prior to discharge into sewer system.

In December 2018, the company was classified as a Significant Source of PFAS. Per GLWA's requirement, the company submitted a Best Management Practice (BMP) Plan on May 9, 2019 regarding reducing and/or eliminating PFAS from the site's groundwater discharge. Site PFAS concentrations were identified and site hydraulic profile was studied. Several adsorbent media were studied for PFAS removal. During 2018 and 2019, site PFOS concentrations were detected above 60 ng/l. During this permit's time period, the company proposes to pump and discharge from the French drain on as needed basis to maintain the desired groundwater level at site. Company proposes to treat the collected groundwater with activated carbon unit (1000 pounds) in the renewed permit's time duration for removing PFOS. The GLWA authorizes the company to discharge into the sewer only after installing the carbon treatment system and pretreating the groundwater through the said system. The treatment system shall be maintained at site during the permit's duration.

Proposed long-term remedy: The proposed long term remedy being pursued to manage impacted groundwater within the Area 1 Barrier Wall includes, the installation of a cap over the entire area within the Area1, to eliminate infiltration of precipitation and thereby eliminating the need to extract groundwater from the current existing French Drain. This will be achieved by:

- Building a structure with approx. 370,000 sq. ft. concrete floor that will serve as cap and covering the remainder of the area with clay and/or constructing paved driveways and parking/truck ramps.
- Directing roof drains and run off from uncovered areas to leak proof storm sewer system thereby eliminating potential infiltration back into Area 1 Barrier Wall area.
- Allowing groundwater to gravity drain from an area within the barrier wall where groundwater does not contain PFOS into a sump from where it can be pumped, treated and discharged into sewer.

The above proposed plan is conceptual and may change.

3) Discharge Flow Rate

The maximum discharge rate from remediation site shall not exceed 60,000 gpd per day. The treatment system operates 24 hours per day, with maximum flow rate of 40 gpm. Any plans to increase the flow rate must be approved in writing by the GLWA prior to implementation.

SECTION C: MONITORING REQUIREMENTS

1) Analytical Requirements

   i) During the permit's time duration, the company shall monitor and analyze the discharge once every month for parameters listed in Section B except for TTO.

   ii) TTO shall be analyzed once every year.

2) The GLWA may collect independent samples for analysis, or may request "split" portion of the sample the company collected.

SECTION D: REPORTING REQUIREMENTS

1) For the permit's duration, the company shall submit the analytical data to the GLWA every six (6) months.

2) In addition to the laboratory analysis, each report shall include the following information:
   i) Reporting period, date of sampling, sampling location and total flow to date
   ii) Certification that the analyzed discharge is, or is not in compliance with the permit discharge limits
   iii) Copy of the maintenance logbook. (Refer to Section E, paragraph 8)
   iv) Signature of the company's authorized representative

SECTION E: GENERAL CONDITIONS AND REQUIREMENTS

1. If the sampling performed indicates non-compliance of the permit limitations; the company must:
   a) Cease the discharge to the GLWA sewer system,
   b) Notify the Department within 24 hours of becoming aware of the violation, and
   c) Arrange a meeting with the Industrial Waste Control Division to discuss corrective actions prior to resumption of discharge.
   d) Notification Requirements for PFAS Compounds: The GLWA has not established Local Pollutant Discharge Limitations at this time, however should the results of sampling exceed the interim Compliance Standard of 60 ng/l (for PFOS) and/or 2,300 ng/l (for PFOA), the permittee shall notify GLWA by either written notification, email to iwc@glwater.org, or notification by telephone to the GLWA at the telephone

number (313) 297-5826, within twenty-four (24) hours of becoming aware of the exceedance.

i. NOTE: For purposes of this section, when interpreting, *"within twenty-four (24) hours of becoming aware"* the GLWA shall consider the reasonable time frame which the authorized representative, or their designated authorized representative, actually or should have become aware of the exceedance through due diligence.

ii. The permittee is required to conduct resampling after for PFAS compounds following such notification, after carbon change out.

iii. If applicable, the permittee shall maintain records for any off-site disposal of liquids or solids of PFAS Compounds, and a summary of this information shall be provided with the next Six-Month report (See Section D, 1). This information shall be made available to GLWA upon request.

2. The company shall report all interruptions and shutdowns due to rainfall, mechanical breakdowns or other major causes within 24 hours of becoming aware of the event.

3. The company must comply with the General and Specific Pollutant Prohibitions described in the City of Detroit Ordinance 08-05.

4. No other discharge beyond those described and authorized by this permit shall occur without written approval from the GLWA.

5. Non-compliance with any term or condition of this permit shall constitute a violation of the GLWA's sewer use ordinance, and may result in immediate revocation of the permit and appropriate enforcement action.

6. The requirements and conditions established in this permit do not relieve the company of its obligation to comply with any applicable pretreatment regulations, standards, requirements, or laws that may become effective during the term of this permit.

7. The company shall take all necessary precautions to avoid the obstruction of the normal flow of traffic customary to the street(s).

8. The company must maintain a maintenance log. This log shall at least contain dated and timed records of all:

   a) Inspection visits
   b) Changes or replacements of the Activated Carbon Units
   c) Samples taken
   d) Breakdown of operations with:
      i) Reason for breakdown
      ii) Actions taken to prevent reoccurrence of breakdown

9. The company shall notify the GLWA in writing or by telephone at least twenty-four (24) hours prior to initial discharge.

10. The Special Discharge Permit shall not be reassigned or transferred without the written approval of the GLWA

11. In the event of slug loading or accidental discharge the Permittee shall telephone the GLWA at the Systems Control Center (313 267 6000) and inform the GLWA about the details of discharge within one (1) hour of becoming aware

12. Any violations of the permit parameter limitations and requirements shall be subjected to a penalty of $500.00 per violation per day.

Attachment - Total Toxic Organics (TTO)

Purgeable Compounds	Extractable Compounds
1,1,1-Trichloroethane	Benzo (k) Fluoranthene or (11,12-Benzofluoranthene)
1,1,2,2-Tetrachloroethane	Bis (2-Chloroethoxy) Methane
1,1,2-Trichloroethane	Bis (2-Chloroethyl) Ether
1,1-Dichloroethane	Bis (2-Chloroisopropyl) Ether
1,1-Dichloroethylene	Bis (2-Ethylhexyl) Phthalate
1,2-Dichlorobenzene	Butyl benzyl phthalate or (Benzyl butyl phthalate)
1,2-Dichloroethane	Chrysene
1,2-Dichloropropane	Dibenzo (a,h) Anthracene or (1,2,5,6-Dibenzanthracene)
1,3-Dichloropropylene or (1,3-Dichloropropene)	Diethyl Phthalate
1,2-Trans-Dichloroethylene or (Trans-1,2-Dichloroethene)	Dimethyl Phthalate
1,3-Dichlorobenzene	Di-N-Butyl Phthalate
1,4-Dichlorobenzene	Di-N-Octyl Phthalate
2-Chloroethylvinyl Ether	Fluorene
Acrolein	Hexachlorobenzene
Acrylonitrile	Hexachlorobutadiene
Benzene	Hexachlorocyclopentadiene
Bromoform (Tribromomethane)	Hexachloroethane
Carbon Tetrachloride or (Tetrachloromethane)	Indeno (1,2,3-cd) Pyrene or (2,3-o-Phenylene Pyrene)
Chlorobenzene	Isophorone
Chlorodibromomethane or (Dibromochloromethane)	Naphthalene
Chloroethane	Nitrobenzene
Chloroform or (Trichloromethane)	N-Nitrosodimethylamine
Dichlorobromomethane or (Bromodichloromethane)	N-Nitrosodi-N-Propylamine
Ethylbenzene	N-Nitrosodiphenylamine
Methyl Bromide or (Bromomethane)	p-Chloro-m-Cresol or (4-chloro-3-methyl phenol)
Methyl Chloride or (Chloromethane)	Pentachlorophenol
Methylene Chloride or (Dichloromethane)	Phenanthrene
Tetrachloroethylene or (Tetrachloroethene)	Phenol
Toluene	Pyrene
Trichloroethylene or (Trichloroethene)	**Pesticides & PCB**
Vinyl Chloride or (Chloroethylene)	2,3,7,8-Tetrachlorodibenzo-p-Dioxin
Xylene	4,4-DDD or (p,p-TDE)
Extractable Compounds	4,4-DDE or (p,p-DDX)
1,2,4-Trichlorobenzene	4,4-DDT
1,2-Diphenylhydrazine	Aldrin
2,4,6-Trichlorophenol	Alpha-BHC
2,4-Dichlorophenol	Alpha-Endosulfan or (Endosulfan I)
2,4-Dimethylphenol	Beta-BHC
2,4-Dinitrophenol	Beta-Endosulfan or (Endosulfan II)
2,4-Dinitrotoluene	Chlordane
2,6-Dinitrotoluene	Delta-BHC
2-Chloronapthalene	Dieldrin
2-Chlorophenol	Endosulfan sulfate
2-Nitrophenol	Endrin
3,3-Dichlorobenzidine	Endrin Aldehyde
4,6-Dinitro-O-Cresol	Fluoranthene
4-Bromophenyl Phenyl Ether	Gamma-BHC
4-Chlorophenyl Phenyl Ether	Heptachlor
4-Nitrophenol	Heptachlor Epoxide or (BHC-Hexachlorocyclohexane)
Acenaphthene	Toxaphene
Acenaphthylene	PCB-1016 (Arochlor 1016)
Anthracene	PCB-1221 (Arochlor 1221)
Benzidine	PCB-1232 (Arochlor 1232)
Benzo (a) Anthracene or (1,2-Benzanthracene)	PCB-1242 (Arochlor 1242)
Benzo (a) Pyrene or (3,4-Benzopyrene)	PCB-1248 (Arochlor 1248)
Benzo (b) Fluoranthene or (3,4-Benzofluoranthene)	PCB-1254 (Arochlor 1254)
Benzo (ghi) Perylene or (1,12-Benzoperylene)	PCB-1260 (Arochlor 1260)

* Quantification level for PCBs shall not exceed 0.2 ug/l based on U.S.EPA method 608