



**CONESTOGA-ROVERS
& ASSOCIATES**

14496 Sheldon Road, Suite 200, Plymouth, Michigan 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

June 1, 2012

Reference No. 017303

Mr. Luther Blackburn
Industrial Pretreatment Program Supervisor
Ypsilanti Community Utilities Authority (YCUA)
2777 State Road
Ypsilanti, Michigan 48198-9112

Dear Mr. Blackburn:

Re: 30-Day Parameter Exceedance Report
Industrial User Permit #RA 6-12
Revitalizing Auto Communities Environmental Response Trust (RACER)
Company Vehicle Operations Area (CVO)
2901 Tyler Road, Ypsilanti, Michigan

Conestoga-Rovers and Associates (CRA) has prepared this letter pursuant to requirements of Industrial User Permit # RA 6-12 (Permit) Appendix A, Reporting Requirements for Parameter Exceedance. The violation was initially reported to YCUA on May 15, 2012 at 5:12 pm via email. The attached 30-Day Parameter Exceedance Report Form (Report) provides the required details.

As described in the Report, CRA and RACER are currently evaluating additions to the treatment, as such, the violation is not ongoing and discharge will not resume until changes are made to the treatment process. It is undetermined when the changes will be in place; therefore, the pollutant re-sampling has not occurred and this Report is submitted without those results.

Should you have any questions, please do not hesitate to contact me at (734) 453-5123.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Beth Landale

BL/bw/17/Det.
Encl.

cc: Grant Trigger, RACER
David Favero, RACER

Equal
Employment
Opportunity Employer

REGISTERED COMPANY FOR
ISO 9001
ENGINEERING DESIGN

Industrial Pretreatment Program

30-Day Parameter Exceedance Report

Attach additional sheets if necessary

- 1) Facility Name: Revitalizing Auto Communities Environmental Response Trust (RACER) – CVO Site
- 2) Permit#: RA 6-12
- 3) Representative reporting violation: Beth Landale
- 4) Representative's title: Environmental Consultant (CRA) Project Manager
- 5) Date and time violation was initially reported to YCUA: May 15, 2012 @ 5:12 pm (following receipt of analytical data from laboratory on standard two week turnaround time)
- 6) Notification was provided via: ☐ Phone ☐ Fax ☒ E-Mail
- 7) Describe the violation, the cause thereof (indicate if unknown), and the violation's impact on the user's compliance status:

The analytical results collected during a May 3, 2012 treatment event identified the effluent of the treated water exceeded the permitted discharge limit for vinyl chloride. The effluent result was 1.1 mg/L, which exceeds the permit limit of 0.2 mg/L. Review of influent analytical data from this year (April and May 2012) indicates that the concentrations are significantly higher than last year (June through November 2011). This increase in concentrations is expected to be because of a lower water table due to the mild winter. The violation occurred because the current contact time between the water and the carbon is not sufficient to reduce these significantly higher concentrations to below permit limits.

- 8) Indicate the duration of violation, including the exact date and time of violation, and if not corrected, the anticipated time the violation is expected to continue (indicate if changes were made in the treatment process):

The duration of the violation was approximately 9.25 hours on May 3, 2012. As this is a batch treatment operation, no additional discharge will occur without some additional treatment being included in the treatment train.

- 9) Indicate steps being taken to reduce, eliminate, and prevent a reoccurrence of the violation:

CRA and RACER are currently evaluating what additional treatment to include in the treatment process. The current evaluation includes the use of an air stripper or chemical oxidation to reduce the chlorinated volatile organic compound concentrations. Future discharge to YCUA will not occur until the treatment process is revised.

- 10) Attach laboratory report with chain of custody for wastewater analysis that indicated the violation.

The attached laboratory report was truncated to remove unnecessary pages.

- 11) Attach laboratory report with chain of custody for pollutant re-sampling.

As described above, CRA and RACER are currently evaluating additions to the treatment and discharge will not resume until changes are made to the treatment process. Therefore pollutant re-sampling has not occurred. This will be completed once the changes have been made to the treatment process.

Certification Statement

" I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name of Representative (please print): Grant Trigger

Signature: 

Title: Michigan Clean Up Manager for Revitalizing Auto Communities Environmental Trust

Date: May 31, 2012

Please forward the above report with all necessary attachments by mail or fax to the following:

Industrial Pretreatment Program Supervisor
Ypsilanti Community Utilities Authority
2777 State Rd.
Ypsilanti, MI 48198

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

ANALYTICAL REPORT

TestAmerica Laboratories, Inc.

TestAmerica Canton

4101 Shuffel Street NW

North Canton, OH 44720

Tel: (330)497-9396

TestAmerica Job ID: 240-10963-1

Client Project/Site: 17303-T02-01, RACER CVO

For:

Conestoga-Rovers & Associates, Inc.

14496 Sheldon Road, Suite 200

Plymouth, Michigan 48170

Attn: Mr. Paul Wiseman



Authorized for release by:

5/11/2012 1:49:37 PM

Nathan Pietras

Project Manager II

nathan.pietras@testamericainc.com

Designee for

Denise Heckler

Project Manager II

denise.heckler@testamericainc.com

LINKS

Review your project
results through

TotalAccess

Have a Question?



Visit us at:

www.testamericainc.com

This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.

Results relate only to the items tested and the sample(s) as received by the laboratory.

Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 17303-T02-01, RACER CVO

TestAmerica Job ID: 240-10963-1

Method: 624 - Volatile Organic Compounds (GC/MS)

Client Sample ID: WW-17303-050312-CB-003

Lab Sample ID: 240-10963-1

Date Collected: 05/03/12 09:00

Matrix: Water

Date Received: 05/04/12 09:15

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	20	U	20	2.6	ug/L			05/08/12 20:50	20
Vinyl chloride	1100		20	4.4	ug/L			05/08/12 20:50	20
Carbon tetrachloride	20	U	20	2.6	ug/L			05/08/12 20:50	20
Chlorobenzene	20	U	20	3.4	ug/L			05/08/12 20:50	20
Chloroform	20	U	20	3.2	ug/L			05/08/12 20:50	20
1,4-Dichlorobenzene	20	U	20	2.6	ug/L			05/08/12 20:50	20
1,1-Dichloroethene	20	U	20	3.8	ug/L			05/08/12 20:50	20
1,2-Dichloroethane	20	U	20	4.4	ug/L			05/08/12 20:50	20
Tetrachloroethene	20	U	20	5.8	ug/L			05/08/12 20:50	20
Trichloroethene	20	U	20	3.4	ug/L			05/08/12 20:50	20
2-Butanone (MEK)	20	U	20	11	ug/L			05/08/12 20:50	20

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	84		81 - 112		05/08/12 20:50	20
1,2-Dichloroethane-d4 (Surr)	87		80 - 125		05/08/12 20:50	20
Toluene-d8 (Surr)	92		84 - 110		05/08/12 20:50	20

Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 17303-T02-01, RACER CVO

TestAmerica Job ID: 240-10963-1

Method: 624 - Volatile Organic Compounds (GC/MS)

Client Sample ID: WW-17303-050312-CB-004

Lab Sample ID: 240-10963-2

Date Collected: 05/03/12 09:15

Matrix: Water

Date Received: 05/04/12 09:15

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	20	U	20	2.6	ug/L			05/09/12 01:55	20
Vinyl chloride	1000		20	4.4	ug/L			05/09/12 01:55	20
Carbon tetrachloride	20	U	20	2.6	ug/L			05/09/12 01:55	20
Chlorobenzene	20	U	20	3.4	ug/L			05/09/12 01:55	20
Chloroform	20	U	20	3.2	ug/L			05/09/12 01:55	20
1,4-Dichlorobenzene	20	U	20	2.6	ug/L			05/09/12 01:55	20
1,1-Dichloroethene	20	U	20	3.8	ug/L			05/09/12 01:55	20
1,2-Dichloroethane	20	U	20	4.4	ug/L			05/09/12 01:55	20
Tetrachloroethene	20	U	20	5.8	ug/L			05/09/12 01:55	20
Trichloroethene	20	U	20	3.4	ug/L			05/09/12 01:55	20
2-Butanone (MEK)	20	U	20	11	ug/L			05/09/12 01:55	20

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	83		81 - 112		05/09/12 01:55	20
1,2-Dichloroethane-d4 (Surr)	86		80 - 125		05/09/12 01:55	20
Toluene-d8 (Surr)	91		84 - 110		05/09/12 01:55	20

Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 17303-T02-01, RACER CVO

TestAmerica Job ID: 240-10963-1

Method: 624 - Volatile Organic Compounds (GC/MS)

Client Sample ID: TB-17303-050312-CB-005

Lab Sample ID: 240-10963-3

Date Collected: 05/03/12 00:00

Matrix: Water

Date Received: 05/04/12 09:15

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Benzene	1.0	U	1.0	0.13	ug/L			05/08/12 22:26	1
Vinyl chloride	1.0	U	1.0	0.22	ug/L			05/08/12 22:26	1
Carbon tetrachloride	1.0	U	1.0	0.13	ug/L			05/08/12 22:26	1
Chlorobenzene	1.0	U	1.0	0.17	ug/L			05/08/12 22:26	1
Chloroform	1.0	U	1.0	0.16	ug/L			05/08/12 22:26	1
1,4-Dichlorobenzene	1.0	U	1.0	0.13	ug/L			05/08/12 22:26	1
1,1-Dichloroethene	1.0	U	1.0	0.19	ug/L			05/08/12 22:26	1
1,2-Dichloroethane	1.0	U	1.0	0.22	ug/L			05/08/12 22:26	1
Tetrachloroethene	1.0	U	1.0	0.29	ug/L			05/08/12 22:26	1
Trichloroethene	1.0	U	1.0	0.17	ug/L			05/08/12 22:26	1
2-Butanone (MEK)	1.0	U	1.0	0.57	ug/L			05/08/12 22:26	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
4-Bromofluorobenzene (Surr)	85		81 - 112		05/08/12 22:26	1
1,2-Dichloroethane-d4 (Surr)	88		80 - 125		05/08/12 22:26	1
Toluene-d8 (Surr)	92		84 - 110		05/08/12 22:26	1

Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 17303-T02-01, RACER CVO

TestAmerica Job ID: 240-10963-1

Method: 608 - Polychlorinated Biphenyls (PCBs) (GC)

Client Sample ID: WW-17303-050312-CB-003

Date Collected: 05/03/12 09:00

Date Received: 05/04/12 09:15

Lab Sample ID: 240-10963-1

Matrix: Water

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aroclor-1016	0.099	U	0.099	0.044	ug/L		05/09/12 09:43	05/10/12 03:25	1
Aroclor-1221	0.099	U	0.099	0.045	ug/L		05/09/12 09:43	05/10/12 03:25	1
Aroclor-1232	0.099	U	0.099	0.072	ug/L		05/09/12 09:43	05/10/12 03:25	1
Aroclor-1242	0.099	U	0.099	0.059	ug/L		05/09/12 09:43	05/10/12 03:25	1
Aroclor-1248	0.099	U	0.099	0.060	ug/L		05/09/12 09:43	05/10/12 03:25	1
Aroclor-1254	0.099	U	0.099	0.032	ug/L		05/09/12 09:43	05/10/12 03:25	1
Aroclor-1260	0.099	U	0.099	0.038	ug/L		05/09/12 09:43	05/10/12 03:25	1

Surrogate	%Recovery	Qualifier	Limits	Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	43		10 - 114	05/09/12 09:43	05/10/12 03:25	1
Tetrachloro-m-xylene	55		15 - 131	05/09/12 09:43	05/10/12 03:25	1

Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 17303-T02-01, RACER CVO

TestAmerica Job ID: 240-10963-1

Method: 608 - Polychlorinated Biphenyls (PCBs) (GC)

Client Sample ID: WW-17303-050312-CB-004

Lab Sample ID: 240-10963-2

Date Collected: 05/03/12 09:15

Matrix: Water

Date Received: 05/04/12 09:15

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aroclor-1016	0.10	U	0.10	0.044	ug/L		05/09/12 09:43	05/10/12 04:09	1
Aroclor-1221	0.10	U	0.10	0.045	ug/L		05/09/12 09:43	05/10/12 04:09	1
Aroclor-1232	0.10	U	0.10	0.073	ug/L		05/09/12 09:43	05/10/12 04:09	1
Aroclor-1242	0.10	U	0.10	0.060	ug/L		05/09/12 09:43	05/10/12 04:09	1
Aroclor-1248	0.10	U	0.10	0.061	ug/L		05/09/12 09:43	05/10/12 04:09	1
Aroclor-1254	0.10	U	0.10	0.032	ug/L		05/09/12 09:43	05/10/12 04:09	1
Aroclor-1260	0.10	U	0.10	0.038	ug/L		05/09/12 09:43	05/10/12 04:09	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
DCB Decachlorobiphenyl	62		10 - 114				05/09/12 09:43	05/10/12 04:09	1
Tetrachloro-m-xylene	33		15 - 131				05/09/12 09:43	05/10/12 04:09	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 17303-T02-01, RACER CVO

TestAmerica Job ID: 240-10963-1

General Chemistry

Client Sample ID: WW-17303-050312-CB-003

Lab Sample ID: 240-10963-1

Date Collected: 05/03/12 09:00

Matrix: Water

Date Received: 05/04/12 09:15

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH	7.43	HF	0.100	0.100	SU			05/04/12 16:36	1
Phenols, Total	0.0074	J	0.040	0.0073	mg/L		05/07/12 08:45	05/07/12 13:08	1
Chemical Oxygen Demand	62		20	10	mg/L		05/11/12 07:38	05/11/12 11:02	1

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Client Sample Results

Client: Conestoga-Rovers & Associates, Inc.
Project/Site: 17303-T02-01, RACER CVO

TestAmerica Job ID: 240-10963-1

General Chemistry

Client Sample ID: WW-17303-050312-CB-004

Lab Sample ID: 240-10963-2

Date Collected: 05/03/12 09:15

Matrix: Water

Date Received: 05/04/12 09:15

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
pH	7.42	HF	0.100	0.100	SU			05/04/12 16:44	1
Phenols, Total	0.014	J	0.040	0.0073	mg/L		05/07/12 08:45	05/07/12 13:13	1
Chemical Oxygen Demand	75		20	10	mg/L		05/11/12 07:44	05/11/12 11:04	1



**CONESTOGA-ROVERS
& ASSOCIATES**

CHAIN OF CUSTODY RECORD

14496 Sheldon Road, Suite #200, Plymouth, Michigan 48170

Phone: (734) 453-5123

Fax: (734) 453-5201

COC NO.: **PL- 08275**

PAGE **1** OF **1**

(See Reverse Side for Instructions)

Project No/ Phase/Task Code: 017303 - T02-01				Laboratory Name: Test America				Lab Location: North Canton, OH				SSOW ID: 30640-T02-014																																																																							
Project Name: CVO				Lab Contact: Denise Heckler				Lab Quote No:				Cooler No:																																																																							
Project Location: Ypsilanti, MI				SAMPLE TYPE				CONTAINER QUANTITY & PRESERVATION				ANALYSIS REQUESTED (See Back of COC for Definitions)																																																																							
Chemistry Contact: Paul Wiseman				Matrix Code (see back of COC)				Grab (G) or Comp (C)				MS/MSD Request																																																																							
Sampler(s): C. Bondy																																																																																			
<table border="1"> <thead> <tr> <th>Item</th> <th>SAMPLE IDENTIFICATION (Containers for each sample may be combined on one line)</th> <th>DATE (mm/dd/yy)</th> <th>TIME (hh:mm)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>WW-17303-050312-CB-003</td> <td>5/3/12</td> <td>900</td> </tr> <tr> <td>2</td> <td>WW-17303-050312-CB-004</td> <td>5/3/12</td> <td>915</td> </tr> <tr> <td>3</td> <td>TB-17303-050312-CB-005</td> <td>5/3/12</td> <td>-</td> </tr> </tbody> </table>				Item	SAMPLE IDENTIFICATION (Containers for each sample may be combined on one line)	DATE (mm/dd/yy)	TIME (hh:mm)	1	WW-17303-050312-CB-003	5/3/12	900	2	WW-17303-050312-CB-004	5/3/12	915	3	TB-17303-050312-CB-005	5/3/12	-	<table border="1"> <thead> <tr> <th>Unpreserved</th> <th>Hydrochloric Acid (HCl)</th> <th>Nitric Acid (HNO₃)</th> <th>Sulfuric Acid (H₂SO₄)</th> <th>Sodium Hydroxide (NaOH)</th> <th>Methanol/Water (Soil VOC)</th> <th>EnCores 3x5-g, 1x25-g</th> <th>Other:</th> <th>Total Containers/Sample</th> </tr> </thead> <tbody> <tr> <td>6</td> <td>9</td> <td></td> <td>6</td> <td></td> <td></td> <td></td> <td></td> <td>21</td> </tr> <tr> <td>3</td> <td>3</td> <td></td> <td>3</td> <td></td> <td></td> <td></td> <td></td> <td>9</td> </tr> <tr> <td>1</td> <td>1</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>1</td> </tr> </tbody> </table>				Unpreserved	Hydrochloric Acid (HCl)	Nitric Acid (HNO ₃)	Sulfuric Acid (H ₂ SO ₄)	Sodium Hydroxide (NaOH)	Methanol/Water (Soil VOC)	EnCores 3x5-g, 1x25-g	Other:	Total Containers/Sample	6	9		6					21	3	3		3					9	1	1							1	<table border="1"> <thead> <tr> <th>VOC List 2</th> <th>PCB</th> <th>Total Phenolics</th> <th>COD</th> <th>PH*</th> </tr> </thead> <tbody> <tr> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> </tbody> </table>				VOC List 2	PCB	Total Phenolics	COD	PH*	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
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TAT Required in business days (use separate COCs for different TATs): ☐ 1 Day ☐ 2 Days ☐ 3 Days ☐ 1 Week ☒ 2 Week ☐ Other:				Total Number of Containers: 31				Notes/ Special Requirements: * pH collected after 1700.																																																																											
All Samples in Cooler must be on COC				BATCH COMPLETE																																																																															
RELINQUISHED BY		COMPANY		DATE		TIME		RECEIVED BY		COMPANY		DATE		TIME																																																																					
1. C. Bondy		CRA		5/3/12		1830		1. Miguel Colon		TAC		5/4/12		9:15																																																																					
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THE CHAIN OF CUSTODY IS A LEGAL DOCUMENT - ALL FIELDS MUST BE COMPLETED ACCURATELY

Distribution:

WHITE - Fully Executed Copy (CRA)

YELLOW - Receiving Laboratory Copy

PINK - Shipper

GOLDENROD - Sampling Crew

CRA Form: COC-10A (20110804)