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Remediation and Liability Management Company, Inc.

September 1, 2004

Mr. Tim Benton
District Supervisor
DEQ – Water Division – Lansing District
525 West Allegan
PO Box 30242, 4th Floor North
Lansing 48933

Dear Mr. Benton:

Re: "No Exposure Certification" for Exclusion from NPDES Storm Water Permitting
Former Peregrine (US) Inc. Coldwater Road Facility, Genesee Township, Michigan
MIR 000 020 743

This letter presents the "No Exposure Certification" for the Former Peregrine (US) Inc. Coldwater Road Facility (Facility) located in Genesee Township, Michigan. This Facility was previously covered under NPDES permit number MIS519000 and CQC MIS510354. It is requested that these previous permits be terminated due to the condition of no exposure that currently exists at the Facility. The "No Exposure Certification" form is included as Attachment A.

It is our understanding that MDEQ will perform an inspection of the Facility prior to approving the "No Exposure Certification". However, the Facility is currently non-operational and a fence and locked gates restrict access. To perform an inspection of the Facility, access can be arranged by contacting Ms. Sylvie Eastman at (519) 884-0510.

Should you have any questions on the attached, please do not hesitate to contact me at (248) 753-5799.

Yours truly,

REMEDATION AND LIABILITY MANAGEMENT COMPANY, INC.

Cheryl Hiatt
Project Manager
REALM, Inc.

KP/pw/12636/1

Encl.

c.c.: Marilyn Dedyne (REALM)
Jean Caufield (REALM)
Steve Sliver (MDEQ)
Sylvie Eastman (CRA)
Glenn Turchan (CRA)

ATTACHMENT A
NO EXPOSURE CERTIFICATION

Confidential under FOIA
Alex Rothchild
LFR
Sep 30, 2009 09:19

12636Denton-1-AttTP

NPDES
FORM
3510-11



United States Environmental Protection Agency
Washington, DC 20460

**NO EXPOSURE CERTIFICATION for Exclusion from
NPDES Storm Water Permitting**

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require permit authorization for its storm water discharges associated with industrial activity in the State identified in Section B under EPA's Storm Water Multi-Sector General Permit due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each facility qualifying for the no exposure exclusion. In addition, the exclusion from NPDES permitting is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the no exposure exclusion.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at its facility or site, and is obligated to comply with the terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed Instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3 and 4.

A. Facility Operator Information

1. Name: REALM COLDWATER ROAD FACILITY 2. Phone: 2487535799
3. Mailing Address: a. Street: 2000 CENTERPOINT PARKWAY MC483520190
b. City: PONTIAC c. State: MI d. Zip Code: 48341-3147

B. Facility/Site Location Information

1. Facility Name: REALM COLDWATER ROAD FACILITY
2. a. Street Address: G-1245 E COLDWATER ROAD
b. City: GENESEE TOWNSHIP c. County: GENESEE
d. State: MI e. Zip Code: 48559

3. Is the facility located on Indian Lands? Yes ☐ No ☒

4. Is this a Federal facility? Yes ☐ No ☒

5. a. Latitude: 43° 45' 00" b. Longitude: -83° 05' 00"

6. a. Was the facility or site previously covered under an NPDES storm water permit? Yes ☒ No ☐

b. If yes, enter NPDES permit number: MIS519000, COC MIS510354

7. SIC/Activity Codes: Primary: 37 Secondary (if applicable):

8. Total size of site associated with industrial activity: 118.7 acres

9. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? Yes ☐ No ☒

b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion. However, your permitting authority may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage.

Less than one acre ☐ One to five acres ☐ More than five acres ☐

NPDES
FORM
3510-11



**NO EXPOSURE CERTIFICATION for Exclusion from
NPDES Storm Water Permitting**

Form Approved
OMB No. 2040-0211

C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?
(Please check either "Yes" or "No" in the appropriate box.) If you answer "Yes" to any of these questions
(1) through (11), you are not eligible for the no exposure exclusion.

	Yes	No
1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Materials or residuals on the ground or in storm water inlets from spills/leaks	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Materials or products from past industrial activity	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Material handling equipment (except adequately maintained vehicles)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Materials or products during loading/unloading or transporting activities	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Materials or products handled/stored on roads or railways owned or maintained by the discharger	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters])	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10. Application or disposal of process wastewater (unless otherwise permitted)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water outflow	<input type="checkbox"/>	<input checked="" type="checkbox"/>

D. Certification Statement

I certify under penalty of law that I have read and understand the eligibility requirements for claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water permitting.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the NPDES permitting authority and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the NPDES permitting authority, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, 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 gathered and evaluated 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.

Print Name: MARILYN DEDYNE

Print Title: PROGRAM DIRECTOR

Signature: Marilyn Dedyne

Date: 09/17/04