



May 18, 2010

Doug Wagner  
MLC Project Manager  
Motors Liquidation Company  
500 Renaissance Center  
Suite 1400  
Detroit, Michigan 48243

RE: SIGNIFICANT INDUSTRIAL USER DISCHARGE PERMIT # 09-517 MOTORS LIQUIDATION COMPANY

Dear Mr. Wagner:

In accordance with local, state and federal regulations, the City of Saginaw Wastewater Treatment Division issues this industrial user discharge permit to Motors Liquidation Company. The permit addresses many requirements that are necessary for compliance with wastewater discharges into the publicly owned treatment works.

Changes to the mailing address and contact information warranted revisions to the discharge permit. If any significant changes occur during the permitting cycle, addendums to the permit will be issued.

If there are any questions regarding this permit, please do not hesitate to contact the Environmental Compliance Office at (989) 759-1523.

Sincerely,

A handwritten signature in cursive script that reads "Jason Casteel".

Jason Casteel  
Environmental Compliance Manager  
Saginaw Wastewater Treatment Facility

Enclosure 1

**INDUSTRIAL WASTEWATER DISCHARGE PERMIT  
FOR THE SAGINAW WASTEWATER TREATMENT SYSTEM**

**Table of Contents**

<b>Topic</b>	<b>Page</b>
<b>Permit Cover Letter</b> .....	<b>1</b>
<b>Table of Contents</b> .....	<b>2</b>
<b>Permit Main Page</b> .....	<b>3</b>
<b>I. Classifications (CA and SIC)</b> .....	<b>4</b>
<b>II. Standard Conditions</b> .....	<b>4 - 13</b>
<b>III. Monitoring Points</b> .....	<b>13</b>
<b>IV. Monitoring Requirements</b> .....	<b>13 - 15</b>
<b>Maps of Sampling Locations, Figure 1 and 2</b> .....	<b>16 - 17</b>
<b>V. Monitoring Point Limits</b> .....	<b>18</b>
<b>VI. Surcharge Limits</b> .....	<b>19</b>
<b>VII. Special Conditions</b> .....	<b>19</b>
<b>VIII. Reporting Requirements</b> .....	<b>19 - 23</b>
 <b>APPENDIX</b>	
<b>Compliance Monitoring Report Checklist</b> .....	<b>24</b>

**Saginaw Wastewater Treatment Facility  
Public Services Department**

Permit: # 09-517

Permit Type: Significant Industrial User

**INDUSTRIAL WASTEWATER DISCHARGE PERMIT  
FOR THE SAGINAW WASTEWATER TREATMENT SYSTEM**

Company Name: Motors Liquidation Company

Mailing Address: 500 Renaissance Center  
Suite 1400  
Detroit, Michigan 48243

Contact: Doug Wagner

MLC Project Manager

Phone: 419-656-0701

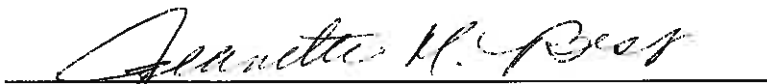
Facility Address: 77 West Center  
Saginaw, MI 48605

This permit is granted in accordance with the application and related support data filed with the Wastewater Treatment Facility at 2406 Veterans Memorial Parkway, and in conformity with the City of Saginaw Code of Ordinances Title V, Chapter 51 and Northwest Utilities Authority Sewage Disposal Regulations No. 91-1, and all applicable state and federal rules and regulations.

This permit is designed to prevent the discharge of pollutants into the POTW that, singly or in combination with other pollutants, would not meet applicable pretreatment standards and requirements, would interfere with the operation of the POTW, would pass through the POTW into the receiving waters or the atmosphere, would inhibit or disrupt the POTW's processing, use or disposal of sludge, would cause health or safety problems for POTW workers, or would result in a violation of the City's NPDES permit or of other applicable laws and regulations.

The Control Authority issues this permit effective on 18 May 2010 and shall expire on 26 August 2014 unless terminated sooner by the Control Authority.

A permit shall be authorized for 5-year periods or less and an application must be completed and filed with the Environmental Compliance Office at 2406 Veterans Memorial Parkway, Saginaw, MI 48601-1268, no later than ninety (90) days prior to the expiration date of this permit.



Jeanette Best  
Superintendent  
Saginaw Wastewater Treatment Facility

**I. CATEGORIES AND CLASSIFICATION CODES**

**A. 40 CFR Categorical Pretreatment Classification(s)**

Not Applicable

**B. Significant Industrial Classification Code(s)**

SIC Code	SIC Code Description
3322	Malleable Iron Foundries

**II. STANDARD CONDITIONS**

**A. General Conditions and Definitions**

**1. Severability**

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

**2. Duty to Comply**

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

**3. Compliance with State and Federal Regulations**

Compliance with the Wastewater discharge permit does not relieve the permittee of responsibility for compliance with all applicable federal and state pretreatment standards, including those, which become effective during the term of the wastewater discharge permit.

**4. Duty to Mitigate**

The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

**5. Permit Modification**

The Director may modify a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- a. To incorporate any new, revised or otherwise applicable federal, state, or local pretreatment standards or requirements affecting the POTW or the user;
- b. To address significant alterations or additions to the user's operation, processes, or wastewater volume or character since the time of wastewater discharge permit issuance;
- c. A change in the POTW or from any condition of the user's discharge, facility, production or operations that requires either a temporary or permanent reduction or elimination of the authorized discharge;
- d. Information indicating that the permitted discharge poses a threat to the City's POTW processing, use or disposal of sludge, City personnel, or the receiving waters;
- e. Violation of any terms or conditions of the POTW wastewater discharge permit;
- f. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting;
- g. Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13;
- h. To correct typographical or other errors in the wastewater discharge permit;
- i. To reflect a transfer of the user facility ownership or operation to the new owner or operator;
- j. To add or revise a compliance schedule for the permittee;

- k. To reflect changes or revisions in the POTW's NPDES permit;
- l. To ensure POTW compliance with applicable sludge management requirements promulgated by EPA or MDEQ;
- m. To incorporate any new or revised requirements resulting from reevaluation of the POTW's local limits; or
- n. To incorporate a request for modification by the permittee as determined appropriate by the POTW and provided the request does not create a violation of any applicable requirement, standard, law, rule or regulation. The permittee shall be informed of any changes in the permit at least 30 days prior to the effective date of the change, unless a shorter time is determined necessary by the director to meet applicable laws or to protect human health or the environment.

#### **6. Permit Revocation**

The Director may revoke a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- a. Failure to notify the Director of significant changes to the wastewater properties before the changed discharge;
- b. Failure to notify the Director of any planned significant changes to the users' operations or system which might alter the nature, quality, or volume of its wastewater at least ninety (90) days prior to the change;
- c. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- d. Falsifying self-monitoring reports;
- e. Tampering with monitoring equipment;
- f. Refusing to allow the Director timely access to the facility premises and records;
- g. Failure to meet effluent limitations;
- h. Failure to pay fines;
- i. Failure to pay sewer charges or surcharges;
- j. Failure to meet compliance schedule;
- k. Failure to complete a wastewater survey or the wastewater discharge permit application;
- l. Failure to provide advance notice of the transfer of business ownership of a permitted facility;
- m. Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit;
- n. As determined by the Director, the discharge has a reasonable potential to endanger human health or the environment and the threat can be abated only by revocation of the permit.

#### **7. Permit Appeals**

The user may, in writing, petition the Director to reconsider the terms of a wastewater discharge permit within thirty (30) days of notice of its issuance.

- a. Failure to submit a timely petition for review shall be deemed a waiver of the administration appeal.
- b. In its petition, the appealing party must indicate the wastewater discharge permit provisions objected to, the reasons for the objection, and the alternative condition, if any, it seeks to place in the wastewater discharge permit.
- c. During an appeal, the effectiveness of a new wastewater discharge permit, if said new permit is not a renewal of a prior permit, shall not be stayed pending the appeal process. If the wastewater discharge permit being appealed is a renewal of a prior discharge permit and the application for the renewed permit was made in a timely manner prior to the expiration of the then effective permit, then the prior discharge permit shall continue in effect until the final administrative decision on the appeal has been made.

- d. If the Director fails to act within (30) thirty days (or a longer period if agreed upon in writing by the Director and the user), a request for the reconsideration shall be denied. Decisions not to reconsider a wastewater discharge permit, or not to modify a wastewater discharge permit shall be considered final administrative actions for purpose of judicial review.
- e. Aggrieved parties seeking judicial review of the final administrative wastewater discharge permit decision must do so by filing a complaint with the Circuit Court for Saginaw County.

**8. Limitation on Permit Transfer**

- a. Wastewater discharge permits may be transferred to a new owner or operator provided the permittee gives at least (30) thirty days advance notice to the Director and the Director approves the wastewater discharge permit transfer. The notice to the Director must include a written certification by the new owner or operator which:
  - (1) States that the new owner and/or operator have no immediate intent to change the facility's operations and processes;
  - (2) Identifies the specific date on which the transfer is to occur; and
  - (3) Acknowledges full responsibility for complying with the existing wastewater discharge permit.
- b. Failure to provide advance notice of a transfer renders the wastewater discharge permit void as of the date of facility transfer.

**9. Continuation of Expired Permits**

A user with an expiring wastewater discharge permit shall apply for wastewater discharge permit reissuance by submitting a complete permit application, in accordance with the City of Saginaw, Code of Ordinances Title V, § 51.34, a minimum of ninety (90) days prior to the expiration of users existing wastewater discharge permit.

**10. Dilution**

No user shall ever increase the use of process water, or in any way attempt to dilute a discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a pretreatment standard or requirement unless expressly authorized by an applicable pretreatment standard or requirement. The Director may impose mass limitations on users who are using dilution to meet applicable pretreatment standards or requirements, or other cases when the imposition of mass limitations is appropriate.

**11. Definitions**

- a. *Biosolids* – The settleable solids separated from liquids during municipal WWTP processing.
- b. *BOD<sub>5</sub>*– Biochemical Oxygen Demand, The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure for five (5) days at 20°C, usually expressed as a concentration (e.g., mg/L).
- c. *Bypass* – The intentional diversion of waste streams from any proportion of a user's pretreatment facility for compliance with pretreatment standards.
- d. *CIU - Categorical Industrial User*, An industrial user subject to Federal Categorical Pretreatment Standards.
- e. *CMR- Compliance Monitoring Report*, A periodic report indicating the nature and concentration of pollutants discharged to the POTW.
- f. *Composite Sample* – A sample that is collected over a period greater than fifteen (15) minutes, formed either by continuous sampling or by mixing an appropriate amount of discrete samples which are:
  - (1) Collected at equal time intervals and combined in proportion to the wastewater flow; or
  - (2) Equal volumes taken at varying time intervals in proportion to the wastewater flow; or
  - (3) Equal volumes taken at equal time intervals.
- g. *Control Authority* – The City of Saginaw, administered by the Wastewater Treatment Division, Office of Environmental Compliance.

- h. *Daily Maximum* – The maximum allowable discharge of a pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- i. *Director* – The Director of Saginaw Public Services Department, or the authorized deputy, agent or representative of such person.
- j. *Environmental Compliance Office* – City of Saginaw Wastewater Treatment Facility Industrial Pretreatment Office, Control Authority.
- k. *EPA* – Environmental Protection Agency, the U.S. Environmental Protection Agency or, where appropriate, the Regional Water Division Director, or other duly authorized official.
- l. *Grab Sample* – A sample that is taken from a waste stream without regard to the flow in the waste stream and over a period of time not to exceed fifteen (15) minutes.
- m. *IU* – Industrial User, A source of indirect discharge.
- n. *Interference* – A discharge, which alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the Saginaw Wastewater Treatment Facility, its treatment processes or operations or its sludge processes, use or disposal; and therefore, is a cause of violation of the Saginaw Wastewater Treatment Facility's NPDES permit or of the prevention of sewage sludge use or disposal in compliance with any of the following statutory/ regulatory provisions or permits issued hereunder, or any more stringent state or local regulations.
- o. *Medical Wastes* – Isolation wastes, infectious agents and associated biologicals, liquid human and animal wastes, human blood and blood byproducts, bedding, surgical wastes, sharps, body parts, contaminated bedding, potentially contaminated laboratory wastes, and dialysis wastes.
- p. *Monthly Average* – The arithmetic mean of the values for effluent samples collected during a calendar month or specified thirty (30) day period (as opposed to a rolling thirty (30) day window).
- q. *NA* – Not Applicable
- r. *NPDES Permit* – National Pollution Discharge Elimination System Permit, is the regulatory agency document issued by either a federal or state agency, which is designed to control all discharges from point sources into U.S. waterways.
- s. *Pollutant* – Without limitation, all of the following:
  - (1) Dredged soil, solid waste, incinerated residue, filter backwash, sewage, garbage, sewage sludge, munitions, medical wastes, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt, municipal, agricultural and industrial wastes;
  - (2) Certain characteristics of wastewater (e.g., but not limited to, pH, temperature, total suspended solids, turbidity, color, biochemical oxygen demand, chemical oxygen demand, toxicity, or odor);
  - (3) Substances regulated by categorical pretreatment standards;
  - (4) Substances discharged to the POTW which are required to be monitored by the user, are limited in the POTW's NPDES permit, or required to be identified in the POTW's application for a NPDES permit or in the user's application for a wastewater discharge permit;
  - (5) Substances for which control measures on users are necessary to avoid restricting the POTW's sludge use and disposal program, to avoid worker health and safety problems; and
  - (6) Toxic Substances

- t. *POTW* – Public Owned Treatment Works, a wastewater treatment works that is owned by the city. This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature and any sewers, pipes or other conveyances that convey wastewater to a treatment plant, which is part of the POTW.
- u. *Sanitary Sewer* – A sewer that carries sewage and to which storm, surface, and subsurface, waters shall not intentionally be admitted.
- v. *SIU* – Significant Industrial User:
  - (1) A user subject to categorical pretreatment standards; or
  - (2) A user that:
    - (a) Discharges an average of twenty-five thousand (25,000) gpd or more of process wastewater to the POTW (excluding sanitary, non-contact cooling, and boiler wastewater);
    - (b) Contributes a process wastewater which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW; or
  - (3) Is designated as such by the City on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirements.
  - (4) Upon a finding that a user meeting the criteria in subparagraph (2) has no reasonable potential for adversely affecting the POTW's operations or for violating any pretreatment standard or requirement, the Control Authority may at any time, on its own initiative or in accordance with procedures in 40 CFR 403.8 (f) (6), determine that such a user should not be considered a Significant Industrial User.
- w. *Sludge* – Biosolids, the settleable solids separated from liquids during processing.
- x. *Surcharge* – The additional treatment charges by the City for the treatment of wastewater containing pollutants in excess of specified concentration, loading or other applicable limits.
- y. *Wastewater* – Liquid and water that carries industrial wastes and sewage from residential dwellings, commercial buildings, industrial and manufacturing facilities, and institutions, whether treated or untreated, which contribute to the POTW.
- z. *Wastewater Treatment Plant or Treatment Plant*- That portion of the POTW, designed to provide treatment of municipal sewage and industrial waste.

**12. Prohibited Discharge Standards**

- a. Whenever deemed necessary, the Director may require users to restrict their discharge during peak flow periods, designate that certain wastewater be discharged only into specific sewers, relocate and /or consolidate points of discharge separate sewage waste streams, from industrial waste streams, and such other conditions as may be necessary to protect the POTW and determine the user's compliance with the requirements of this permit.
- b. *General Prohibitions* – No user shall introduce or cause to be introduced into the POTW any pollutant or wastewater that causes pass through, interference, or causes the City to violate its NPDES Permit or its biosolids management programs. These general prohibitions apply to all users of the POTW whether or not they are subject to categorical pretreatment standards or any other federal, state or local pretreatment standards or requirements.
- c. *Specific Prohibitions* – No user shall introduce or cause to be introduced into the POTW the following pollutants, substances or wastewater:
  - (1) Pollutants, which create a fire or explosion hazard in the POTW, including but not limited to, waste streams with a closed cup flash point of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR



261.21.

- (2) Wastewater having a pH less than 6.0 or more than 10.5 or otherwise causing corrosive structural damage to the POTW or equipment. The City may enforce a maximum pH of 9.0 for individual users if the Director determines that a higher pH may be detrimental to the POTW;
- (3) Solid or viscous substances in amounts or of such size which will cause obstruction of the flow in POTW or resulting in interference of flow in POTW or resulting in interference including any substance detrimental to or determined by the Director to be detrimental to the POTW;
- (4) Pollutants, including oxygen-demanding pollutants (BOD, etc.), released in a discharge at a flow rate and /or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;
- (5) Wastewater having a temperature greater than 120 degrees Fahrenheit, or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater that causes the temperature at the head end of the treatment plant to exceed 104 degrees Fahrenheit or 40 degrees Centigrade;
- (6) Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin, in amounts that will cause interference or pass through;
- (7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
- (8) Trucked or hauled pollutants, except at discharge point designated by the Director in accordance with City of Saginaw, Code of Ordinances, Title V, § 51.33;
- (9) Noxious or malodorous liquids, gases, solids, or other wastewater which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or hazard to life, or to prevent entry to the POTW for maintenance or repair;
- (10) Wastewater that imparts color and cannot be removed by the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions, which consequently imparts color to the treatment plant's effluent;
- (11) Wastewater containing any radioactive wastes or isotopes except in compliance with state or federal regulations;
- (12) Sludge, screenings, or other residues from the pretreatment of industrial wastes;
- (13) Medical wastes, except as specifically authorized by the director in a wastewater discharge permit;
- (14) Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test;
- (15) Detergents, surface-active agents, or other substances which may cause excessive foaming in the POTW;
- (16) Fats, oils, or greases of animal or vegetable origin in concentrations greater than one hundred (100) mg/L;
- (17) Collectable floating fats, oils, or greases;
- (18) Garbage that has not been properly shredded;
- (19) Pollutants, which cause a high concentration of inert, suspended solids, such as, but not limited to, lime slurries, diatomaceous earth and lime residues;
- (20) Pollutants, which cause high concentrations of, dissolved solids, such as, but not limited to, sodium chloride;
- (21) Pollutants, which exert a COD that would increase operational expense or cause treatment problems;
- (22) Pollutants, which exert high chlorine demand, such as, but not limited to, nitrate, cyanide, thiocyanate, sulfite and thiosulfate;
- (23) Pollutants, which result in water or waste materials containing toxic or poisonous

substances that may damage or interfere with any sewage treatment process or that may be a hazard in the receiving waters of the state;

(24) Any substance which may cause the POTW effluent or any other product of the POTW such as biosolids, residue, sludge or scum, to be unsuitable for reclamation and reuse or to interfere with the biosolids management, reuse or reclamation process where the POTW is pursuing biosolids reuse or reclamation program. In no case shall a substance be discharged to the POTW and cause the disposal criteria guidelines or regulations under applicable federal, state or local law.

d. Pollutants, substances, or wastewater prohibited by this section shall not be processed or stored in such a manner that they could be discharged to the POTW.

e. Compliance with this permit does not relieve the permittee from its obligations regarding compliance with all applicable local, state, and federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

**B. Installation, Operation, and Maintenance of Pretreatment Technology and Pollution Controls**

**1. Required Pretreatment**

Users shall provide wastewater treatment as necessary to comply with this permit and shall achieve compliance with all pretreatment standards, local limits, and prohibitions set by the EPA, the state, or the Director whichever is more stringent. Any facility necessary for compliance shall be provided, operated, and maintained at the permittee's expense. Detailed plans describing such facilities and operating procedures shall be submitted to the Director for review, and shall be acceptable to the Director before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the user from the responsibility for modifying such facilities as necessary to produce a discharge acceptable to the Director under the provisions of this permit. Any subsequent changes in such facilities or operating procedures shall be reported to and be approved by the Director prior to the user's commencement of the changes.

**2. Proper Operation and Maintenance**

The permittee shall at all times properly operate and maintain all facilities and systems of pretreatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes without limitation: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

**3. Duty to Halt or Reduce Activity**

Upon efficiency reduction of an operation or loss or failure of all or part of the pretreatment equipment, the permittee shall, to the extent necessary to maintain compliance with all local, state, and federal regulations, control its production and/or discharges until operation of the pretreatment facility is restored or an alternative method of treatment is provided. This requirement applies in situations, including without limitation, where the primary source of power for the pretreatment equipment or facility is reduced, lost, or fails. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**4. Reporting Requirements Operational Bypasses (Reference, Section VIII. G.)**

**5. Removed Substances**

Solids, sludge, filter backwash, or other pollutants removed in the course of treatment or control of wastewater shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

**C. Retention of Records**

**1. Monitoring Information**

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the Control Authority at any time.

**2. Special Enforcement**

All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Control Authority shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

**3. Records of Sampling and Analysis Shall Include:**

- a. The date, exact place, time, methods of sampling or measurements, and sample preservation techniques or procedures;
- b. Who performed the sampling or measurements;
- c. The date(s) analysis was performed;
- d. Who performed the analysis;
- e. The analytical techniques or methods used; and
- f. The results of such analysis.

**D. Inspection and Entry**

The permittee shall allow the Control Authority, or an authorized representative, upon the presentation of credentials and other documents as may be required by law:

**1. Right to Enter**

Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the permit;

**2. Access to Records**

Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

**3. Inspection of Equipment**

Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;

**4. Sampling or Monitoring**

Sample or monitor, for the purpose of assuring permit compliance, any substances or parameters at any location; and

**5. Inspection of Systems**

Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under the permit, could originate, be stored, or be discharged to the sewer system.

**E. Falsifying Information**

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and will result in the imposition of criminal sanctions and/or civil penalties.

**F. Annual Publication**

The Director shall publish annually, in the largest daily newspaper published in the municipality where the POTW is located, a list of the SIUs that during the previous fifteen months, were in

significant noncompliance with applicable pretreatment standards and requirements, in accordance with City of Saginaw Code of Ordinances Title V, § 51.40.

**G. Compliance Schedule**

Compliance Orders may also contain requirements to address noncompliance, including, without limitation, additional self monitoring and management practices designed to minimize the amount of pollutants discharged to the sewer, pretreatment facility design and plan preparation and implementation, and any other affirmative action considered necessary for compliance with this permit.

**H. Civil and Criminal Liability**

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under local, state or federal laws or regulations.

**I. Penalties for Violations of Permit Conditions**

A SIU that violates any provision of the City of Saginaw Code of Ordinances, Title V, this permit, or order issued hereunder, or any state or federal pretreatment standard or regulation is responsible for a municipal civil infraction, subject to payment of a civil fine of not less than \$1,000 per day, plus costs and other sanctions, for each infraction. Fines shall be assessed for each day during the period of violation, as prescribed in the City of Saginaw Code of Ordinances, Title V § 51.41.

**J. Recovery of Costs Incurred**

In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or City of Saginaw Code of Ordinances, Title V, or causing damage to or otherwise inhibiting the City of Saginaw Wastewater disposal system shall be liable to the City for any expense, loss, or damage caused by such violation or discharge. The City of Saginaw shall bill the permittee for the costs incurred by the City of Saginaw for any cleaning, repair, or replacement work caused by the violation.

**K. Pretreatment Charges and Fees**

The City may adopt and levy reasonable fees for full reimbursement of costs, including without limitation, administration and overhead costs, of setting up and operating the City's Pretreatment Program which may include:

**1. Permit Application**

Fees for wastewater discharge permit applications including the cost of processing such application;

**2. Monitoring, Inspection, and Surveillance**

Fees for monitoring, inspection and surveillance procedures including the cost and analyzing a user's discharge, and reviewing monitoring reports submitted by users;

**3. Accidental Discharge**

Fees for reviewing and responding to accidental discharge procedures and construction;

**4. Filing Appeals**

Fees for filing appeals; and

**5. Other Fees**

Other fees as the City may deem necessary to carry out the requirements set forth by this permit, state and federal regulations.

**III. MONITORING POINTS**

**A. Sample Locations**

All non-domestic sewage discharge connections to the City's sewerage system shall be a separate and distinct discharge location and numbered or otherwise identified by the permittee. Each discharge point must have a monitoring manhole or arrangement acceptable to the Control Authority. Each discharge point must be identified and reported separately.

**B. Effective Permit Dates**

During 18 May 2010 to 26 August 2014, Motors Liquidation Company is authorized to discharge wastewater to City of Saginaw from the outfalls listed below.

<b>Monitoring Point</b>	<b>Monitoring Point Description</b>	<b>Treatment System Type</b>
CFD-01	Manhole is located in a grassy area off Salt St. & Florence St. adjacent to SMI's driveway, RR tracks and west of the fence	None

**Waste Water Type:** Sanitary

<b>Monitoring Point</b>	<b>Monitoring Point Description</b>	<b>Treatment System Type</b>
CFD-02	Manhole is located on the 48" sewer directly west of the main entrance	None

**Waste Water Type:** Industrial

**IV. MONITORING REQUIREMENTS**

**A. Sampling Frequency**

Semi-annual

3 times in 2 weeks for flows less than 250,000 gpd (based on dry weather flow)

6 times in 2 weeks for flows greater than 250,000 gpd (based on dry weather flow)

**B. Sampling, Preservation and Laboratory Analysis**

All sampling, preservation and analysis of collected samples shall be performed in accordance with 40 CFR Part 136 unless specified otherwise in this permit. According to the City of Saginaw's Total PCB Minimization Program, the analytical method used for PCB analysis shall be 40 CFR Part 136, method 608. The sampling procedures, preservation and handling, and analytical protocol for mercury shall be in accordance with 40 CFR Part 136 method 245.1. The quantification level for mercury shall not exceed 0.0002 mg/L unless a higher level is appropriate due to sample matrix interference.

**C. Representative Sampling**

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected and maintained to ensure their accuracy. Monitoring points shall not be changed without notification to and the approval of the Control Authority.

**D. Flow Measurement**

Flow measurements must be recorded for all discharges to the city's sewer system. Appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, inspected and maintained to ensure their accuracy of the measured flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

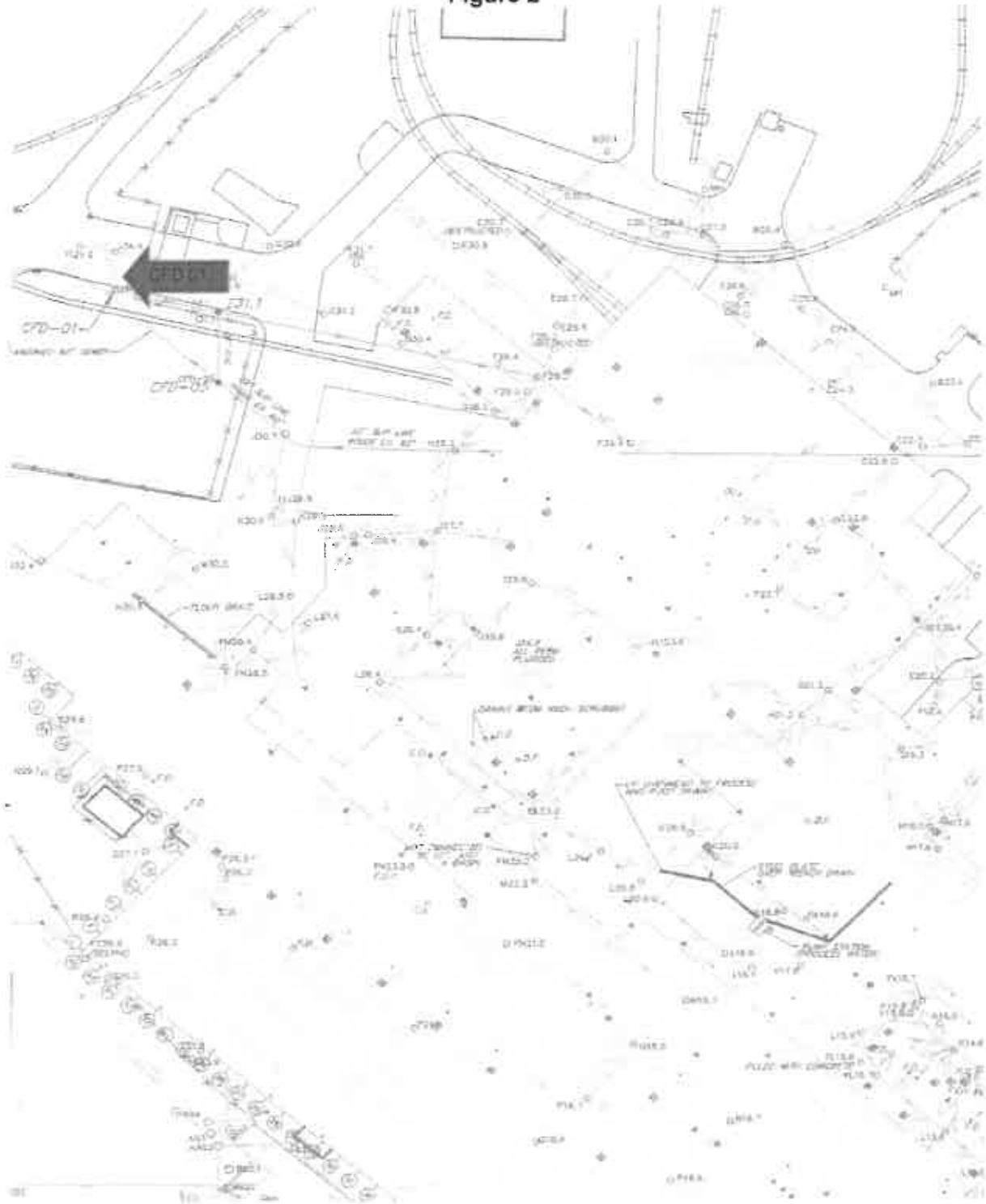
**E. Parameter and Sampling Requirements for CFD 02 and CFD 01**

Parameter	Monitoring Point	Sampling Frequency	Flow Monitoring	Sampling Condition	Sampling Method
pH (su)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	Grab Sample
Temperature (F)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	Grab Sample
Phosphorus, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Bio-chemical Oxygen Demand (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Total Suspended Solids (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Oil and Grease (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	Grab Sample
Ammonia Nitrogen (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Arsenic, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Cadmium, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Chromium, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Copper, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Lead, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Mercury, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Nickel, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Selenium, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Zinc, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
Cyanide, amenable (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	Grab Sample
BTEX, total (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	Grab Sample
Benzene (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	Grab Sample
Total Toxic Organics (mg/L)	CFD 02	3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite & Grab
PCB, total (ug/L)	CFD 02	1 Day / Quarterly 3 Days / Semi-annual	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite
PCB, total (ug/L)	CFD 01	1Day / Quarterly	Report Gallons per Day	Dry Weather	24 Hr Time or Flow Proportional Composite

Figure 1



Figure 2





**V. MONITORING POINT LIMITS**

**A. Local Limits for Saginaw Malleable Iron Plant**

City of Saginaw Code of Ordinances, Title V Chapter 51: Sewer daily maximum allowable wastewater discharge limit for monitoring point CFD 02.

<b>Parameter</b>	<b>Daily Limit</b>
pH (pH Units)	6.0-10.5
Temperature (F)	120
Phosphorus, total (mg/L)	7
Bio-chemical Oxygen Demand (mg/L)	493
Total Suspended Solids (mg/L)	1100
Oil & Grease (mg/L)	100
Ammonia Nitrogen (mg/L)	77
Arsenic, total (mg/L)	0.473
Cadmium, total (mg/L)	0.11
Chromium, total (mg/L)	2.770
Copper, total (mg/L)	1.184
Lead, total (mg/L)	0.377
*Mercury, total (mg/L)	<0.0002
Nickel, total (mg/L)	1.786
Selenium, total (mg/L)	0.083
Zinc, total (mg/L)	1.162
Cyanide, amenable (mg/L)	0.473
Total Toxic Organics (ug/L)	NA
Benzene (mg/L)	0.5
BTEX, total (mg/L)	5
**PCB, total (ug/L)	<0.2

\*The Quantification level shall not exceed 0.0002 mg/L unless a higher level is appropriate due to matrix interference. Any discharge of mercury at or above the quantification level is a specific violation.

\*\*The Quantification level shall not exceed 0.2 ug/L unless a higher level is appropriate due to matrix interference. Any discharge of total PCBs at or above the quantification level is a specific violation.

**VI. SURCHARGE LIMITS**

**A. Parameter surcharges**

Any parameter over the surcharge limit will warrant application of the surcharge to the permittee. Surcharges, if any, will be based upon analytical data either provided by the permittee or sampling analytical data collected by the Control Authority.

**B. Flow Readings**

Flow readings must be provided to determine applied surcharges. Daily flow measurements must be recorded at the time of sampling and provided with the analytical data. Should installation of a flow-metering device be impractical then flow measurements will be determined by using the water meter readings.

**C. City of Saginaw Wastewater Treatment Facility- Surcharge Limits**

Parameter	Limit (mg/L)	Surcharges per lb.
Bio-chemical Oxygen Demand (mg/L)	200	\$0.14
Ammonia Nitrogen (mg/L)	30	\$0.41
Phosphorus, total (mg/L)	4	\$1.02
Total Suspended Solids (mg/L)	350	\$0.12

**VII. SPECIAL CONDITIONS**

The Consent Order between GM-SMI and the City of Saginaw agreed upon 3 December 2001 shall be implemented between Motors Liquidation Company and City of Saginaw effective the date General Motors Powertrain, Saginaw Malleable Iron became Motors Liquidation Company.

**A. Notification of Production and Discharge**

Alex Partners, LLC representative of Motors Liquidation Company shall notify the City of Saginaw, Environmental Compliance Office when the groundwater Treatment system power is restored and they are ready to discharge.

**B. Sampling Schedule**

Motors Liquidation Company shall continue to sample monitoring point CFD 02 and CFD 01 for PCBs on a quarterly schedule throughout the year in accordance with the consent order. Motors Liquidation Company's quarterly sampling for PCBs at monitoring point CFD 02 may be done in conjunction with semi-annual sampling.

**C. Reporting Schedule**

All monitoring data from monitoring points CFD 02 and CFD 01 shall be submitted to the Control Authority quarterly following sampling per this permit section VIII. Reporting Requirements.

**VIII. REPORTING REQUIREMENTS**

**A. Reporting Frequency**

The SIU shall be required to submit Compliance Monitoring Reports semi-annually or more frequently if requested by the Control Authority.

Report(s)	Due Date(s)
Semi -annual Compliance Monitoring Report	June 30 <sup>th</sup>
Semi -annual Compliance Monitoring Report	December 31 <sup>st</sup>
Consent Order Reports	Quarterly following sampling

## **B. Compliance Monitoring Report (CMR) Requirements**

### **1. SIU Compliance Monitoring Report Form**

A checklist that can be used with the CMRs is available for your convenience. Complete all the information on the checklist, sign, date and attach it to the analytical data. There are two ways it can be obtained:

- a. The appendix is located on the last page of this permit.
- b. An editable version of the CMR form is located at (<http://www.Saginaw-mi.com/Government/Departments/wastewater/ipp.php>). Once at the site select the SIU Compliance Monitoring Report Form.

### **2. Compliance Monitoring Report Information**

- a. The CMR must indicate the duration the sample was collected, whether the sample method for collection was flow proportional or time proportional, and if the sample was a grab or a composite sample.
- b. The report must indicate the nature and concentration of all pollutants in the effluent for the sampling and analyses required during each 6-month period.
- c. All parameters must be reported in mg/L with the exception of PCBs, which must be reported in µg/L.
- d. The analytical for Total PCBs shall be in accordance with EPA Method 608. The quantification level shall be 0.2 µg/L unless a higher level is appropriate because of sample matrix interference. If a higher quantification level is appropriate, justification shall be submitted with the report.
- e. A statement of certification that all sampling and analysis are representative of normal daily work cycles must be included.
- f. A statement notifying the Control Authority of any changes in facility activity, production, or discharge practices.
- g. The report must include a record of measured average and maximum daily flows for the reporting period.
- h. The CMR must indicate the time, date, and location and that all sampling and analysis were performed according to 40CFR Part 136.
- i. There must be a reliability statement ensuring laboratories providing test results have an active quality control and quality assurance (QC/QA) program in operation to provide reliable and accurate test data.
- j. A statement must be included notating any changes not previously reported when filing the permit application and baseline monitoring report or since the last compliance monitoring report.
- k. There must be a statement of certification, that any materials, which could cause slug loading or could have detrimental affect on the sewerage system are properly stored in a contained area to eliminate any possible discharge into the sewer system.

## **C. Slug Plan Reporting Requirements**

### **1. Frequency**

Each significant industrial user is required to submit an accidental discharge/slug control plan to the Control Authority.

### **2. Slug Plan Information**

Description of discharge practices, including non-routine batch discharges.

- a. Include a description of stored chemicals.
- b. Procedures for immediately notifying the Director of any accidental or slug discharge, including without limitation notifications required by City of Saginaw Code of Ordinances, Title V, § 51.36 (F)
- c. Include the procedures to prevent adverse impact from any accidental or slug discharge. Such procedures include, but are not limited to, inspection and maintenance of storage

areas, handling and transfer of materials, loading and unloading operations, control of plant site runoff, worker training, building of containment structures or equipment, measures for containing toxic substances and pollutants (including solvents) and measures and equipment for emergency response.

**3. Slug Plan Evaluation**

If a permittee submits or has submitted to the Director plans or documents pursuant to other requirements of local, state or federal laws and regulations that meet all applicable requirements of this section, the Director may at his/her discretion determine if the user has satisfied the accidental discharge/slug control plan submission requirements.

**D. Resource Conservation and Recovery Act ( RCRA)**

**1. Notification of Discharge of Hazardous Wastes**

IUs discharging more than 15 kilograms per month of a waste, which if otherwise disposed of, would be a hazardous waste pursuant to the RCRA requirements under 40 CFR Part 261 are required to provide a one time written notification of such discharge to the Control Authority, State, and EPA. IUs discharging any amount of waste, which if disposed of otherwise, would be an acutely hazardous waste pursuant to RCRA must also provide this notification. This written notification must contain the EPA hazardous waste number and the type of discharge (i.e., batch, continuous). If the IU discharges more than 100 kilograms per month of hazardous waste, the written notification must also include:

- a. An identification of the hazardous constituent in the IU's discharge;
- b. An estimate of the mass and concentration of the constituents in the IU's discharge; and
- c. An estimate of the mass and concentration of constituents in the IU's discharge in a year.

**2. Certification**

IUs must also provide a certification accompanying this notification that a waste reduction program is in place to reduce the volume and toxicity of hazardous wastes to the greatest degree economically practical. Within ninety (90) days of the effective date of the listing of any additional hazardous wastes pursuant to RCRA, IUs must provide a notification of the discharge of such wastes.

**E. Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)**

The CERCLA was enacted and amended by the U.S. Congress to provide authority for response to actual or threatened release of hazardous substance into the environment. The Natural Contingency Plan (40 CFR Part 300) is the regulation promulgated to implement the Act. Section 302.4 contains a table listing the regulated substances. Sewer users must become familiar with the Act requirements and its affects on daily operations.

**F. Reports of Potential Problem or Non-routine Discharges**

**1. Notification**

In the case of any discharge, including, but not limited to, accidental discharges, discharges of a non-routine, episodic nature, a non-customary batch discharge, or a slug load, which may cause potential problems for the POTW, the user shall immediately telephone and notify the Director of the incident. During normal business hours the City of Saginaw, Wastewater Treatment, Environmental Compliance Office (ECO) must be notified immediately by telephone at (989) 759-1523. At all other times, the City of Saginaw Wastewater Treatment Department must be notified by telephone at (989) 759-1634. The notification must include location of discharge, date and time thereof, type of waste, including concentration, and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other report requirements that arise under local, State, or Federal laws.

**2. Written Report**

- a. Within five days following an accidental discharge, the permittee must submit to the Control Authority a detailed written discharge report.

- b. The report must include the cause of the incident, the location of discharge, type, concentration and volume of waste, whether it was a slug load or an accidental discharge, and the impact on the permittee's compliance status.
- c. Include in the report the duration of the violation and the exact date(s) and time(s).
- d. Include all the steps taken or to be taken to reduce, eliminate and/or prevent reoccurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.

**3. Expenses Incurred**

Such notification shall not relieve the permittee of any expense, loss, damage, or other liability, which may be incurred as a result of damage to the POTW, natural resources, or any other damage to person or property; nor shall such notification relieve the user of any fines, penalties, or other liability, which may be imposed pursuant to this permit.

**4. Notify Personnel**

A notice shall be permanently posted on the permittee's bulletin board or other prominent location advising employees whom to call in the event of a discharge as described in this section E, 1. Employers must ensure that all employees who could cause such discharge to occur, are aware of the emergency notification procedures.

**G. Pretreatment Bypass Reporting Requirements**

**1. Prior Notification of Bypass**

If a permittee knows in advance of the need for a bypass, it shall submit prior notice to the Director, at least ten (10) days before the date of the bypass, if possible.

**2. Unanticipated Bypass Notification**

A permittee shall submit oral notice to the Director of an unanticipated bypass that exceeds applicable pretreatment standards within twenty-four (24) hours from the time it becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the user becomes aware of the bypass. The written submission shall contain: a description of the bypass and its cause; the duration of the bypass, including exact dates and times, and, if the bypass has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.

**H. Violation Reporting, Repeat Sampling and Notices of Violation (NOV)**

**1. Notification by Permittee of Violation**

If sampling performed by a permittee indicates a violation, the permittee must notify the Director within twenty-four (24) hours of becoming aware of the violation.

**2. Repeat Sampling Report**

The permittee must also repeat the sampling and analysis and submit the results of the repeat analysis to the Director within thirty (30) days after becoming aware of the violation.

**3. Notice of Violation**

When the Director finds a permittee has violated, or continues to violate, any provision of the City of Saginaw Code of Ordinances Title V, this permit, or order issued hereunder, or any state or federal pretreatment requirements the Director may serve a written Notice of Violation.

**4. Reporting**

Within fourteen (14) days of the receipt of notice from the Control Authority, an explanation of the violation and a plan for satisfactory correction and prevention thereof, including required actions, shall be submitted by the permittee to the Director.

**I. Additional Monitoring**

If the permittee monitors any pollutant more frequently than required by this permit using testing prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by the EPA or as specified in this permit, the results of such monitoring shall be included in the semi-annual report submitted to the City of Saginaw Environmental Compliance Office.

**J. Reports of Changed Conditions**

Each user must notify the Director of any planned significant changes to the user's operations or systems which might alter the nature, quality, or volume of its wastewater at least ninety (90) days before the change. For the purpose of this requirement, significant changes include, but are not limited to, flow increases of twenty percent (20%) or greater, and the discharge of any previously unreported pollutants.

**K. Information Requests**

The permittee shall furnish to the Director, within twenty-four (24) hours any information, which the Director may request, to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee upon request shall also, furnish to the Director within twenty-four (24) hours copies of any records required to be kept by this permit.

**L. Application, Notification and Report Signatories, and Certification**

All wastewater discharge permits, applications, user notifications and written reports must be signed by an authorized representative of the user and contain the following 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."

**M. Control Authority Mailing Address**

All reports required by this permit shall be submitted to the:  
City of Saginaw Wastewater Treatment Facility  
Environmental Compliance Office  
2406 Veterans Memorial Parkway  
Saginaw, MI 48601-1268