



CERTIFIED MAIL

Date: December 20, 2018
Permit No.: SD6-94508

Mr. David Favero
RACER Trust Site/Former GM Livonia
500 Woodward Avenue, Suite 2650
Detroit, MI 48226

**Re: Wastewater Discharge Permit Modification:
Per- and Poly- fluoroalkyl Substances (PFAS)**

Dear Mr. Favero:

The Great Lakes Water Authority (GLWA) has previously identified your facility located at 12950 Eckles Road in Livonia, Michigan as a significant source or potential significant source of PFAS Compounds. This classification is based on either self-monitoring or GLWA sampling. As discussed during the group meetings on December 5 and 6, 2018, the following conditions and requirements were indicated:

1. To develop and implement a Best Practice Management plan to reduce and/or eliminate PFAS Compounds from the wastewater discharge;
2. To submit a Special Discharge Permit Modification (Permit Application Form) with the specific information detailed in the enclosed attachment

The above mentioned documents need to be submitted within 90 days or by March 31, 2019.

Upon receipt of the Special Discharge Permit Application, the GLWA will issue a modified Wastewater Discharge Permit with appropriate conditions and requirements. These conditions and requirements may include self-monitoring and compliance standards for PFOS (perfluorooctane sulfonate) and PFOA (perfluorooctanoic acid).

A copy of the application form is enclosed for your convenience. Please fill out the application form as completely as possible and return it to the Industrial Waste Control Group as soon as possible.

Please note in the beginning of January 2019, the IWC Group will relocate to the following address:

The Great Lakes Water Authority
Industrial Waste Control Group
9300 W. Jefferson Ste. 230
Detroit, MI 48209

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

Sincerely,

Stephen J. Kuplicki, PE, JD
Operations Manager
Great Lakes Water Authority

Attachment

Best Management Program Plans - PFAS Compounds

Any permittee who has been identified as a significant source or potential significant source of PFAS Compounds shall submit a Best Management Plan (BMP) with the information specified below, within 90 days or by March 31, 2019.

Upon receipt, the BMP shall be reviewed and used to develop a modified Wastewater Discharge Permit with appropriate conditions and requirements. As necessary, the permittee shall provide an updated Wastewater/Special Discharge Permit Modification (Permit Application form), so that conditions and requirements may include, where appropriate, self-monitoring; compliance standards, and other requirements for PFOS and PFOA.

Minimum Information Requirements to Support a BMP:

1. Best Management Program Plans (BMP) - The permittee shall develop, maintain and implement a comprehensive program as part of its PFAS Monitoring and Management plan that include treatment methods employed, sampling protocols used, percentage removal, BMP and other Management protocols; for the control, reduction and elimination of PFAS. The program is subject to inspection by GLWA during permittee's annual onsite Comprehensive Inspection. The permittee will review and update its PFAS Monitoring and Management Plan on an annual basis for any changes to its program. The permittee will also update its Waste Analysis Plan to include treatment of PFAS substances. The permittee shall provide a written documentation that it has complied with this requirement and it shall be included with every December Six Month Report.
2. Additional Monitoring and Source Investigation – The GLWA understands that your classification as a significant source or potential significant source of PFAS Compounds is based upon a limited number of sample results and that additional monitoring, analysis and investigations may be needed as part of a comprehensive BMP.
 - i. A permittee who intends to pursue additional monitoring and source investigations shall develop an approvable schedule as part of their BMP;
 - ii. A permittee who does not intend to pursue additional monitoring and source investigations shall indicate so as part of their BMP.
3. Treatment & Removal Capabilities – Were the discharge contributions equal or exceed the compliance standards (PFOS – 60 ng/l and PFOA 420 ng/l):
 - i. The permittee shall provide a description of the waste and wastewater treatment technologies and/or disposal protocols to be used at the facility for the treatment of waste and wastewaters containing PFAS substances.
 - ii. The permittee shall provide documentation showing its capability to treat wastes and wastewaters containing PFAS Substances based upon the treatment technology(ies) described in paragraph 3(i). Such documentation includes but is not limited to treatises, bench-scale treatment models, actual self-monitoring data or equivalent methods. This demonstration must, at a minimum, establish the removal efficiencies expected to be achieved; the volume(s) of waste or wastewater processed for the demonstration and analytical results to calculate the mass loadings of PFAS substances before and after treatment.
 - iii. Where the discharge does not exceed the GLWA's compliance standard, the specifications of subparagraphs I and ii are optional. As appropriate, the permittee shall indicate this as part of their BMP.
4. Self-Monitoring Program
 - i. The permittee shall propose a self-monitoring program for all parameters identified in

Best Management Program Plans - PFAS Compounds

Table 1 below. Currently, GLWA proposes weekly sampling for PFAS Compounds, but will consider alternative proposals.

- ii. Compliance standards may be developed and incorporated into Wastewater Discharge Permits at the discretion of GLWA.
5. Record-keeping
- i. The permittee shall develop and maintain records of the source, volume, and any characterization data collected for specific wastes and wastewaters. The permittee shall maintain this information for onsite inspection by the GLWA and, at a minimum, include calculation of the loading (pounds) received, the loading (pounds) discharged and loading (pounds) disposed off-site per month; and
 - ii. The permittee shall develop and maintain records for the disposal of any liquids or solids resulting from the treatment of PFAS substances. Such information shall be made available for onsite inspection upon request by GLWA.
6. Permit Modifications – GLWA will review and evaluate the BMP and determine applicable permit conditions and requirements to acknowledge and implement the BMP.

Best Management Program Plans - PFAS Compounds

Table 1 - Compliance Standards For Per and Polyfluoroalkyl Substances:

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

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