GLWA
Great Lakes Water Authority

CERTIFIED MAIL

December 15, 2023

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

Re: Renewal of Special Discharge Permit No. SD6-94508
Site: 12950 Eckles Road (RACER Trust site/ Former GM Livonia)

Dear Mr. Favero:

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

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

Should you have any questions, please contact Mr. William Burbidge, of the Permits Section, at (313) 297-5855.

Sincerely,

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

JB/WB

GREAT LAKES WATER AUTHORITY
Industrial Waste Control Group
9300 W. Jefferson Avenue, Suite 210
Detroit, Michigan 48209

SPECIAL DISCHARGE PERMIT NO.: SD6-94508

SECTION A: GENERAL INFORMATION

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

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

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

Effective Date: January 1, 2024

Expiration Date: December 31, 2024

Authorized by:

Joe I. Belen, P.E.
Management Professional
Industrial Waste Control Division

SECTION B: DISCHARGE LIMITATIONS AND MONITORING REQUIREMENT

Special Discharger

1) Representative Sampling Location/Discharge Point

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

Discharge Point: MH located 40 feet N. of Amrhein Road and 335 feet E. of Eckles Road

The following parameters shall be analyzed and reported as per reporting requirements.

(reported in mg/l unless otherwise indicated)

Parameter	Daily Max	Min Sampling Frequency
Acidity/Alkalinity (pH)	5-11.5 SU	1 per Month
Chromium (Cr)	2.77	1 per Month
Fats, Oil or Grease (FOG)	1,500	1 per Month
Lead (Pb)	0.69	1 per Month
Mercury (Hg)	0.01	1 per Month
Nickel (Ni)	3.98	1 per Month
Total PCB (PCB)	Non-detect	1 per Month
Total Suspended Solids (TSS)	10,000	1 per Month
Zinc (Zn)	2.61	1 per Month
Total Toxic Organics (TTO)*	Table II Page 3	1 per Year
Per- and Poly-Fluoroalkyl Substances (PFAS)	Table III Page 4	1 per Month

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

Table II: Monitoring Requirements for Total Toxic Organics (TTO)

Purgeable Compounds	Limit	Extractable Compounds	Limit
1,1,1-Trichloroethane	20 ppb	Alpha-BHC	20 ppb
1,1,2,2-Tetrachloroethane	20 ppb	Alpha-Endosulfan or (Endosulfan I)	20 ppb
1,1,2-Trichloroethane	20 ppb	Anthracene	20 ppb
1,1-Dichloroethane	20 ppb	Benzidine	20 ppb
1,1-Dichloroethylene	20 ppb	Benzo (a) Anthracene or (1,2-Benzanthracene)	20 ppb
1,2-Dichlorobenzene	20 ppb	Benzo (a) Pyrene or (3,4-Benzopyrene)	20 ppb
1,2-Dichloroethane	20 ppb	Benzo (b) Fluoranthene or (3,4-Benzofluoranthene)	20 ppb
1,2-Dichloropropane	20 ppb	Benzo (ghi) Perylene or (1,12-Benzoperylene)	20 ppb
1,3-Dichloropropylene or (1,3-Dichloropropene)	20 ppb	Benzo (k) Fluoranthene or (11,12-Benzofluoranthene)	20 ppb
1,2-Trans-Dichloroethylene or (Trans-1,2-Dichloroethene)	20 ppb	Beta-BHC	20 ppb
1,3-Dichlorobenzene	20 ppb	Beta-Endosulfan or (Endosulfan II)	20 ppb
1,4-Dichlorobenzene	20 ppb	Bis (2-Chloroethoxy) Methane	20 ppb
2-Chloroethylvinyl Ether	20 ppb	Bis (2-Chloroethyl) Ether	20 ppb
Acrolein	20 ppb	Bis (2-Chloroisopropyl) Ether	20 ppb
Acrylonitrile	20 ppb	Bis (2-Ethylhexyl) Phthalate	20 ppb
Benzene	20 ppb	Butyl benzyl phthalate or (Benzyl butyl phthalate)	20 ppb
Bromoform or (Tribromomethane)	20 ppb	Chlordane	20 ppb
Carbon Tetrachloride or (Tetrachloromethane)	20 ppb	Chrysene	20 ppb
Chlorobenzene	20 ppb	Delta-BHC	20 ppb
Chlorodibromomethane or (Dibromochloromethane)	20 ppb	Dibenzo (a,h) Anthracene or (1,2,5,6-Dibenzanthracene)	20 ppb
Chloroethane	20 ppb	Dieldrin	20 ppb
Chloroform or (Trichloromethane)	20 ppb	Diethyl Phthalate	20 ppb
Dichlorobromomethane or (Bromodichloromethane)	20 ppb	Dimethyl Phthalate	20 ppb
Ethylbenzene	20 ppb	Di-N-Butyl Phthalate	20 ppb
Methyl Bromide or (Bromomethane)	20 ppb	Di-N-Octyl Phthalate	20 ppb
Methyl Chloride or (Chloromethane)	20 ppb	Endosulfan sulfate	20 ppb
Methylene Chloride or (Dichloromethane)	20 ppb	Endrin	20 ppb
Tetrachloroethylene or (Tetrachloroethene)	20 ppb	Endrin Aldehyde	20 ppb
Toluene	20 ppb	Fluoranthene	20 ppb
Trichloroethylene or (Trichloroethene)	20 ppb	Fluorene	20 ppb
Vinyl Chloride or (Chloroethylene)	20 ppb	Gamma-BHC	20 ppb
Xylene	20 ppb	Heptachlor	20 ppb
Extractable Compounds	**Limit**	Heptachlor Epoxide or (BHC-Hexachlorocyclohexane)	20 ppb
1,2,4-Trichlorobenzene	20 ppb	Hexachlorobenzene	20 ppb
1,2-Diphenylhydrazine	20 ppb	Hexachlorobutadiene	20 ppb
2,3,7,8-Tetrachlorodibenzo-p-Dioxin	20 ppb	Hexachlorocyclopentadiene	20 ppb
2,4,6-Trichlorophenol	20 ppb	Hexachloroethane	20 ppb
2,4-Dichlorophenol	20 ppb	Indeno (1,2,3-cd) Pyrene or (2,3-o-Phenylene Pyrene)	20 ppb
2,4-Dimethylphenol	20 ppb	Isophorone	20 ppb
2,4-Dinitrophenol	20 ppb	Naphthalene	20 ppb
2,4-Dinitrotoluene	20 ppb	Nitrobenzene	20 ppb
2,6-Dinitrotoluene	20 ppb	N-Nitrosodimethylamine	20 ppb
2-Chloronapthalene	20 ppb	N-Nitrosodi-N-Propylamine	20 ppb
2-Chlorophenol	20 ppb	N-Nitrosodiphenylamine	20 ppb
2-Nitrophenol	20 ppb	PCB-1016 or (Arochlor 1016)	Non-detect*
3,3-Dichlorobenzidine	20 ppb	PCB-1221 or (Arochlor 1221)	Non-detect*
4,4-DDD or (p,p-TDE)	20 ppb	PCB-1232 or (Arochlor 1232)	Non-detect*
4,4-DDE or (p,p-DDX)	20 ppb	PCB-1242 or (Arochlor 1242)	Non-detect*
4,4-DDT	20 ppb	PCB-1248 or (Arochlor 1248)	Non-detect*
4,6-Dinitro-o-Cresol	20 ppb	PCB-1254 or (Arochlor 1254)	Non-detect*
4-Bromophenyl Phenyl Ether	20 ppb	PCB-1260 or (Arochlor 1260)	Non-detect*
4-chloro-3-methyl phenol or (p-Chloro-m-Cresol)	20 ppb	Pentachlorophenol	20 ppb
4-Chlorophenyl Phenyl Ether	20 ppb	Phenanthrene	20 ppb
4-Nitrophenol	20 ppb	Phenol	20 ppb
Acenaphthene	20 ppb	Pyrene	20 ppb
Acenaphthylene	20 ppb	Toxaphene	20 ppb
Aldrin	20 ppb		

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

Table – II: Monitoring Requirements For Per- and Poly- fluoroalkyl Substances

Perfluorobutanoic acid (PFBA)	Report	1 per 3 month
Perfluoropentanoic acid (PFPeA)	Report	1 per 3 month
Perfluorohexanoic acid (PFHxA)	Report	1 per 3 month
Perfluoroheptanoic acid (PFHpA)	Report	1 per 3 month
Perfluorooctanoic acid (PFOA)	Report	1 per 3 month
Perfluorononanoic acid (PFNA)	Report	1 per 3 month
Perfluorodecanoic acid (PFDA)	Report	1 per 3 month
Perfluoroundecanoic acid (PFUnDA)	Report	1 per 3 month
Perfluorododecanoic acid (PFDoDA)	Report	1 per 3 month
Perfluorotridecanoic acid (PFTrDA)	Report	1 per 3 month
Perfluorotetradecanoic acid (PFTeDA)	Report	1 per 3 month
Perfluorobutane Sulfonic acid (PFBS)	Report	1 per 3 month
Perfluoropentane Sulfonic acid (PFPeS)	Report	1 per 3 month
Perfluorohexane Sulfonic acid (PFHxS)	Report	1 per 3 month
Perfluoroheptane Sulfonic acid (PFHpS)	Report	1 per 3 month
Perfluorooctane Sulfonic acid (PFOS)	Report	1 per 3 month
Perfluorononane Sulfonic acid (PFNS)	Report	1 per 3 month
Perfluorodecane Sulfonic acid (PFDS)	Report	1 per 3 month
Perfluorooctane sulfonamide (FOSA)	Report	1 per 3 month
4:2 Fluorotelomer sulfonic acid (4:2 FTSA)	Report	1 per 3 month
6:2 Fluorotelomer sulfonic acid (6:2 FTSA)	Report	1 per 3 month
8:2 Fluorotelomer sulfonic acid (8:2 FTSA)	Report	1 per 3 month
2-N-Ethyl perfluorooctane sulfonamidoacetic acid (EtFOSAA)	Report	1 per 3 month
2-N-Methyl perfluorooctane sulfonamide (N-MeFOSA)	Report	1 per 3 month
Hexafluoropropylene oxide dimer acid (HFPO-DA)	Report	1 per 3 month
11-chloroeicosafluoro-3-oxanone-1-sufonoc acid(11Cl-PF3OUDS)	Report	1 per 3 month
9-chlorohexadecafluoro-3-oxanone-1sulfonic acid (9Cl-PF3ONS)	Report	1 per 3 month
4,8-dioxa-3H-perfluorononanoic acid (ADONA)	Report	1 per 3 month

Analytical Requirement: US EPA Method 537 (modified) or ASTM D7979

2) **Permit Definition**

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

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

In December 2018, the company was classified as a Significant Source of PFAS. Per GLWA's requirement, the company submitted a Best Management Practice (BMP) Plan on May 9, 2019 regarding reducing and/or eliminating PFAS from the site's groundwater discharge. Site PFAS concentrations were identified and site hydraulic profile was studied. Several adsorbent media were studied for PFAS removal. During 2018 and 2019, site PFOS concentrations were detected above 60 ng/l.

In 2020, the carbon treatment was implemented to reduce PFOS concentrations in the effluent. Additional measures were implemented in 2021 to limit infiltration and eliminate or drastically reduce, the need to discharge any groundwater. The long term remedy includes the installation of a cap (redevelopment including building and driveway/parking construction, and use of low permeability geo-membrane and other fill materials outside the building footprint) was implemented in 2021. The treatment system was relocated into a conex box along Amrhein Road and the former GWTP building was demolished.

The company also installed a new French drain in area north of site within barrier wall where groundwater has lower concentrations of PFOS. This French drain has no connection to sewer line and hence has no discharge into sewer. In future if company needs to discharge from this French drain, the company shall request for authorization and shall get approval from GLWA.

During this permit's time period, the company will be pumping discharge from the south French drain on as needed basis, treat and discharge to maintain the desired groundwater level at site. The treatment system which consists of bag filtration and activated carbon (1000 lbs) shall be maintained at site during the permit's duration.

The GLWA received a permit renewal application on November 16, 2023.

3) **Discharge Flow Rate**

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

SECTION C: MONITORING REQUIREMENTS

1. Analytical Requirements
   i) During the permit's time duration, the company shall monitor and analyze the discharge once every month for parameters listed in Section B except for TTO.
   ii) TTO (see Table II) shall be analyzed once every year

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

SECTION D: REPORTING REQUIREMENTS

1. The company shall submit the analytical data to GLWA on or before 15th day of each quarter (April, July, October and January).

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

SECTION E: GENERAL CONDITIONS AND REQUIREMENTS

1. If the sampling performed indicates non-compliance of the permit limitations; the company must:
   a. Cease the discharge to the sewer system,
   b. Notify the Authority within 24 hours of becoming aware of the violation, and
   c. Arrange a meeting with the Industrial Waste Control Group to discuss corrective actions prior to resumption of discharge.
   d. Notification Requirements for PFAS Compounds: The GLWA has not established Local Pollutant Discharge Limitations at this time, however should the results of sampling exceed the interim Compliance Standard of 60 ng/l (for PFOS) and/or 2,300 ng/l (for PFOA), the permittee shall notify GLWA by either written notification, email to iwc@glwater.org, or notification by telephone to the GLWA at the telephone number (313) 297-5826, within twenty-four (24) hours of becoming aware of the exceedance.

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

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

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

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

Notification and Reporting Requirements – The following telephone contact numbers are available for providing notice to the GLWA:

To report Spills, Upsets, Bypasses or Environmental emergencies:

24-hour Numbers: Systems Control Center
(313) 267-6000

Water Resource Recovery Facility
(313) 297-0322 or 297-0326

Non-emergency Number: Industrial Waste Control Office
(313) 297-5857
iwc@glwater.org

Sampling Violations (Self-Monitoring) - Within twenty-four (24) hours of becoming aware of a violation, the IU shall notify:

Mr. William Burbidge by telephone at 313-297-5855
or by email at William.Burbidge@glwater.org

3. The company must comply with the General Pollutant Prohibitions as specified in the GLWA Rules and Regulations.

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

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

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

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

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

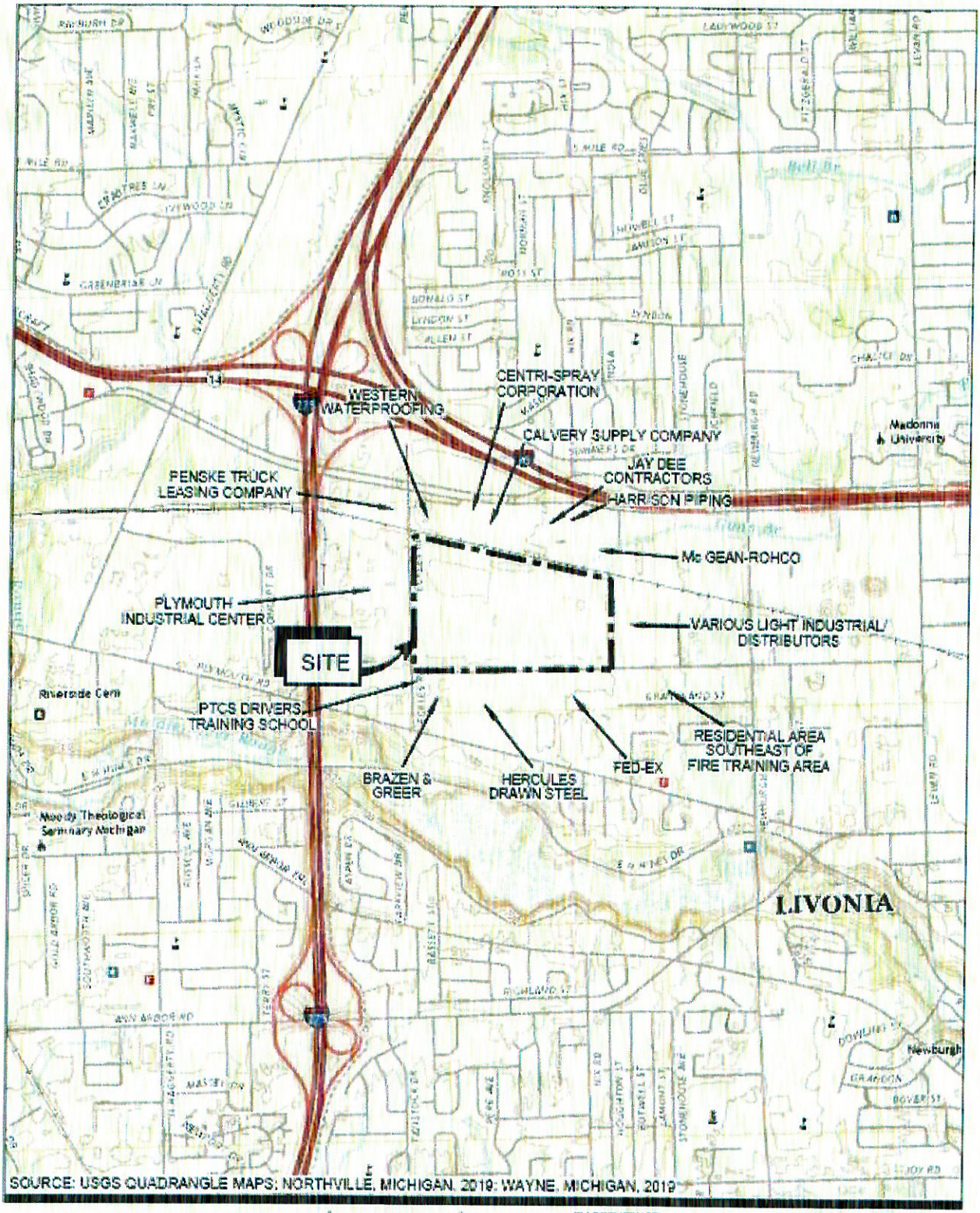
   a. Inspection visits
   b. Changes or replacements of the Activated Carbon Units
   c. Samples taken
   d. Daily Discharge Volume
   e. Breakdown of operations with:
      i. Reason for breakdown
      ii. Actions taken to prevent reoccurrence of breakdown

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

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

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

12. Any violations of the permit parameter limitations and requirements shall be subjected to a penalty.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CENTRI-SPRAY CORPORATION
CALVERY SUPPLY COMPANY
JAY DEE CONTRACTORS
HARRISON PIPING
PENSKE TRUCK LEASING COMPANY
Mc GEAN-ROHCO
PLYMOUTH INDUSTRIAL CENTER
VARIOUS LIGHT INDUSTRIAL/ DISTRIBUTORS
SITE
PTCS DRIVERS TRAINING SCHOOL
RESIDENTIAL AREA SOUTHEAST OF FIRE TRAINING AREA
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BRAZEN & GREER
HERCULES DRAWN STEEL
LIVONIA
Riverside Cem
Madonna University
Newburgh
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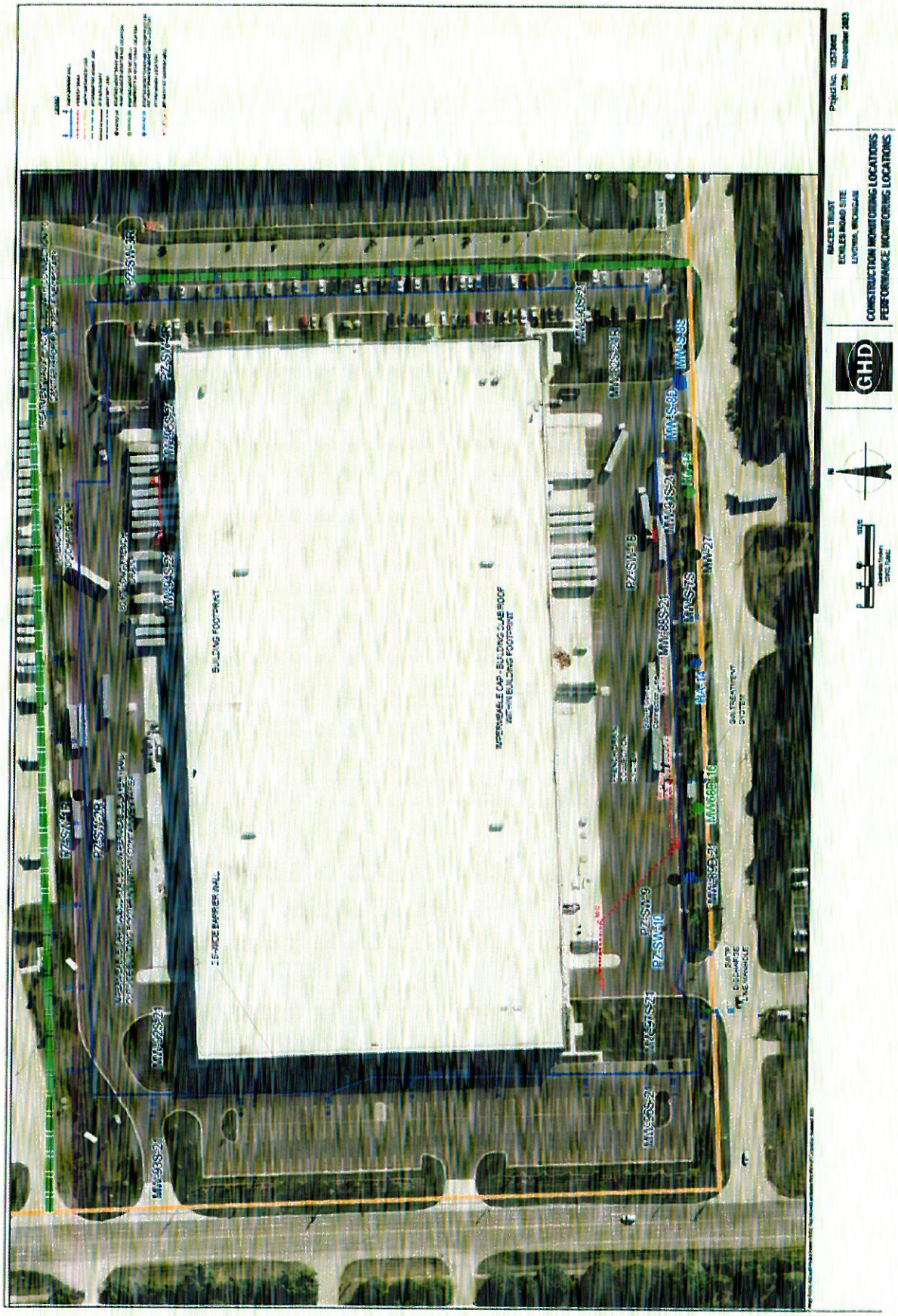
LIVONIA, MICHIGAN
Project No. 12573440
Date November 2022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ECKLES ROAD SITE
LIVONIA, MICHIGAN
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REMOVABLE CAP - BUILDING SLAB ROOF
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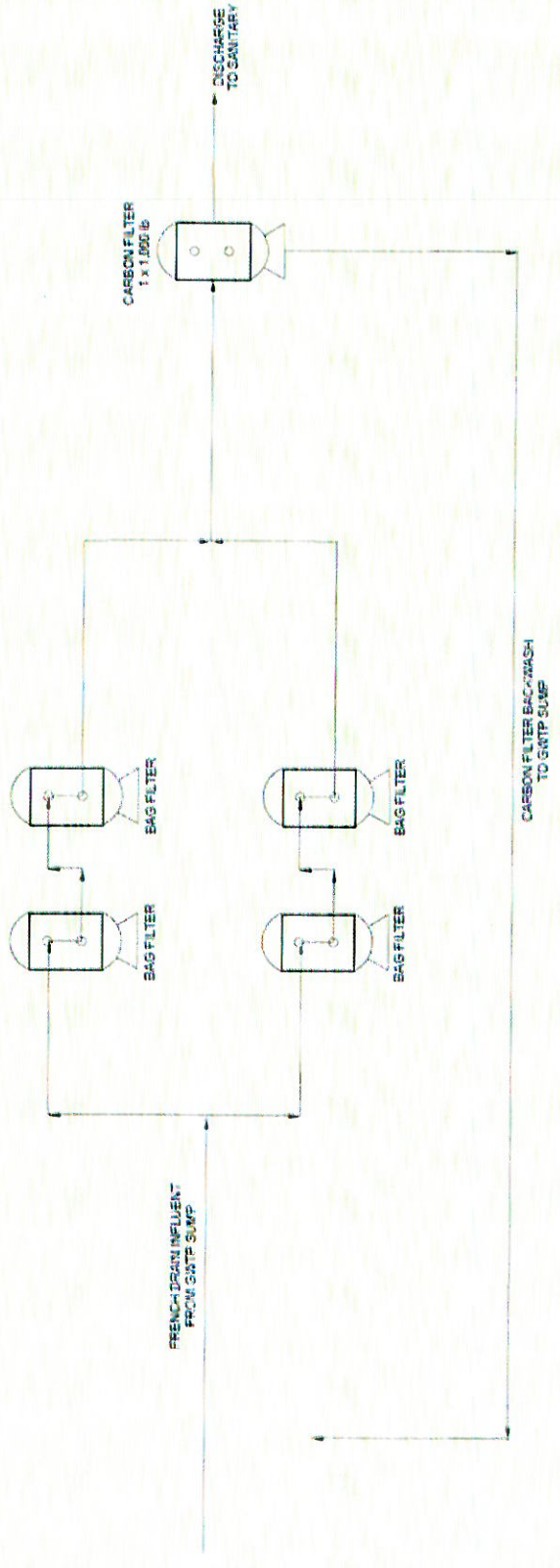

Project No. 12573440
Date: November 2022

RACER TRUST
12250 ECKLES ROAD
LIVONIA, MICHIGAN

UPDATED GWTP

GHD