



October 22, 2018

Mr. David Favero  
RACER Trust  
500 Woodward Avenue, Suite 2650  
Detroit, MI 48226

Re: Your Letter Dated October 18, 2018  
RACER Trust ,12950 Eckles Road in Livonia, MI 48150  
Permit No.: SD6-94508

Dear Mr. Favero:

Great Lakes Water Authority (GLWA), Industrial Waste Control (IWC) is in receipt of your above referenced letter which explains the proposed changes of treatment technology at the RACER Trust ,12950 Eckles Road in Livonia remediation site, to eliminate metals precipitation, flocculation and solids separation, as the current influent Cr and Ni concentrations have been lower than the permit limits since January 2018. The company has requested leniency in the treatment with the elimination of the following: sodium bisulfite and sulfuric acid addition in Tank T-3, magnesium hydroxide in Tank T-5 and flocculation aid polymer in flash mixer tank. The company will maintain the groundwater flow from the French drain sump through all treatment units (i.e. bag filter, T-3, T-4, T-5, flash mixer, flocculation tank, lamella clarifier, polishing sand filter and holding tank T-12), prior to discharge into the city sewer by gravity (see drawing).

GLWA agrees with the proposed changes based on the following conditions.

1. Company shall continue the in-situ chemical reduction treatment technology, which is in practice currently approved by USEPA.
2. Sample and analyze effluent samples once every week for a month effective from the date of the change in treatment operations.
3. Sample and analyze once every month thereafter as authorized by the permit, if the weekly results from the first month comply to limitations in permit.

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4. If any weekly result shows violation(s) of permit limitation, the company shall reinstate the previous treatment technology to remove the pollutants. The treatment technology is specified in the permit dated June 10, 2015.
5. The company shall submit the analytical data in item 2 the following week for review on compliance.

Should you have any questions please contact Ms. Tessy Jose at (313) 297-5878.

Sincerely,

A handwritten signature in dark ink, appearing to read "JBelen", is written over the typed name.

Jose Belen, P.E.  
Engineer

Industrial Waste Control Division

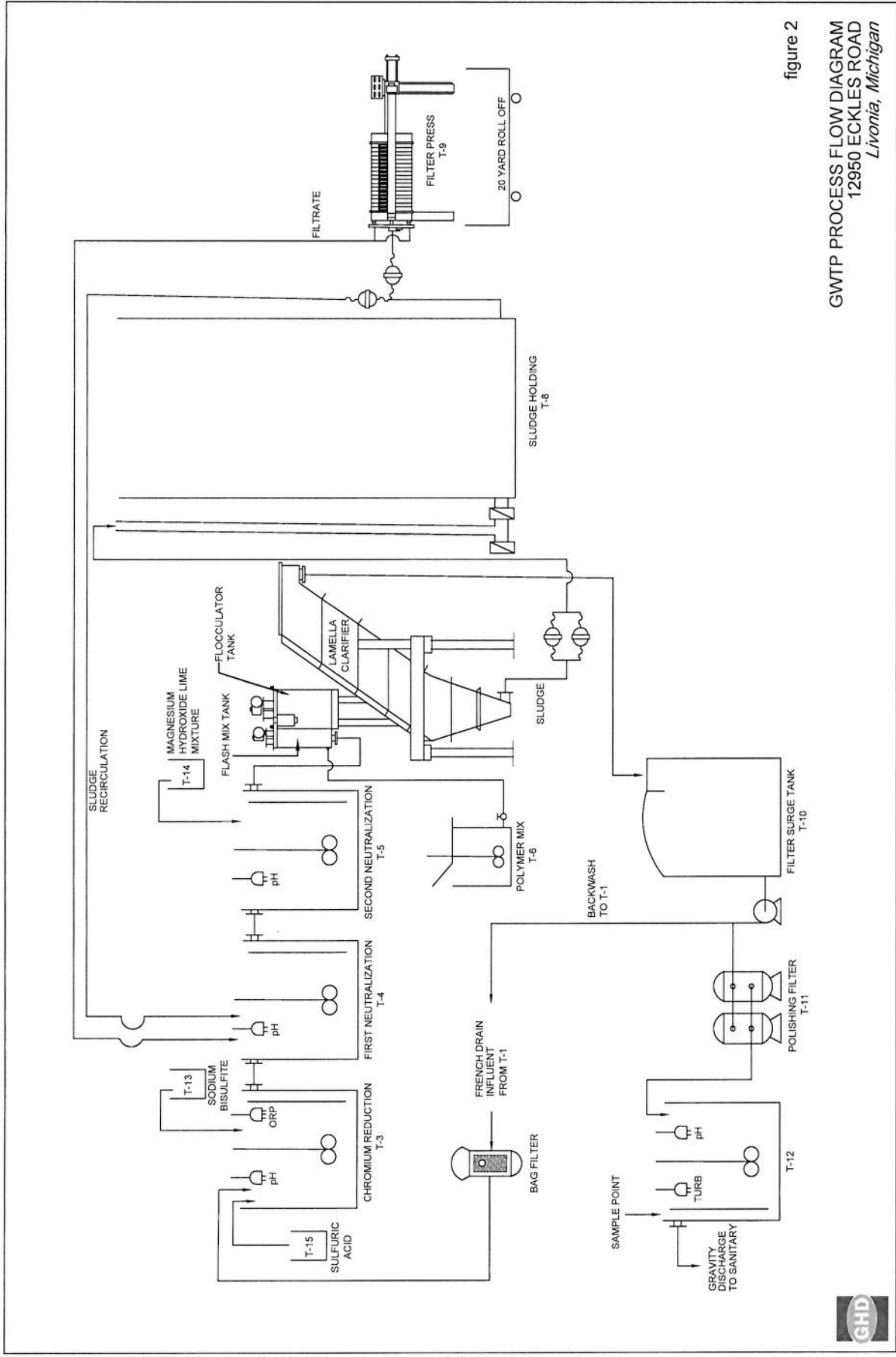


figure 2

GWTP PROCESS FLOW DIAGRAM  
12950 ECKLES ROAD  
Livonia, Michigan

