



YPSILANTI COMMUNITY UTILITIES AUTHORITY

2777 STATE ROAD
YPSILANTI, MICHIGAN 48198-9112
TELEPHONE: (734) 484-4600
FAX: (734) 484-3369
WEBSITE: www.ycua.org

July 9, 2012

Ms. Beth Landale
Project Manager
Conestoga-Rovers & Associates
14496 Sheldon Road, Suite 200
Plymouth, MI 48170

Certified Mail

RE: Monitoring Event Analytical Results (I.U. Permit #RA 12-15)

Dear Ms. Landale:

Enclosed please find the results for the recent monitoring event of the industrial effluent at Outfall 001 located at 2901 Tyler Road in Ypsilanti, Michigan. The monitoring event was conducted by the industrial surveillance staff of the Ypsilanti Community Utilities Authority. The concentration of vinyl chloride constitutes a prohibited discharge and is therefore a violation of the Ypsilanti Township Sewer Use Ordinance and/or Industrial User Permit #RA 12-15. Please find enclosed a Notice of Violation for this reoccurring violation.

All of the other analytical test results are within the parameters of the current Ypsilanti Township Sewer Use Ordinance and/or Industrial User Permit #RA 12-15.

Thank you for your continued dedication and support of the environment. Please contact me with any questions you may have regarding these results by phone at 734-484-4600 ext.121 or by email at pthomas@YCUA.org.

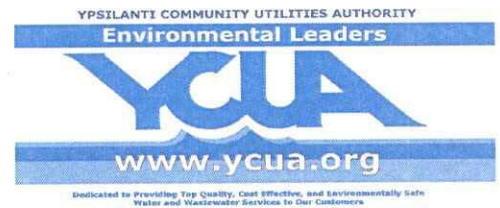
Sincerely,

A handwritten signature in blue ink, appearing to read "Perry M. Thomas".

Perry M. Thomas
YCUA Chief Compliance Officer

**Enclosure: YCUA Laboratory Report
Notice of Violation**

Cc: YCUA IPP Dept. File



Industrial Pretreatment Program

COMPLIANCE DEPARTMENT
2777 State Road
Ypsilanti, MI 48198-9112
Telephone No.: 734.484.4600
Fax No.: 734.544.7149

NOTICE OF VIOLATION

IN THE MATTER OF:

Revitalizing Auto Communities Environmental Response Trust
2901 Tyler Road
Ypsilanti, MI 48198
PERMIT NO: #RA 12-15

CERTIFIED MAIL

I. LEGAL AUTHORITY

This Notice is issued pursuant to the authority vested in the Ypsilanti Community Utilities Authority (YCUA) under Chapter 106, Articles I-IV, Ypsilanti city Code, or Chapter 62, Article I, Ypsilanti Charter Township Code, or equivalent local ordinance, commonly referred to as the "Sewer Use Ordinance," (ORDINANCE), applicable federal and state laws and regulations, a Delegation Agreement (if applicable), and the Users wastewater discharge permit.

II. FINDINGS

1. The YCUA is charged with construction, maintenance, and control of a sewer system and treatment works, including control of certain discharges to that sewer system occurring within municipalities that, by contract, discharge wastewater to the YCUA sewer system and treatment works.
2. To protect the sewer system and treatment works; YCUA administers an Industrial Pretreatment Program (IPP), in compliance with federal and state laws and regulations.
3. Under the IPP, Revitalizing Auto Communities Environmental Response Trust was issued a discharge Permit (RA 12-15) on July 1, 2012.
4. The PERMIT contained limitations on pollutants, self-monitoring/reporting requirements, and other specific conditions of discharge.
5. It has been determined that:
(X) Pollutant analysis revealed that during the following: June 22, 2012 Control Authority Monitoring Event the DISCHARGER wastewater constituted a prohibited discharge and thereby violates the PERMIT:

Recurring is two or more violations of the same type within a twelve-month period.

Recurring Prohibited Discharge: The pollutant analysis as monitored by the Control Authority (YCUA) on June 22, 2012 constituted a violation of the Ypsilanti Township Sewer Use Ordinance (#2001-280) and the PERMIT. The analytical result for the vinyl chloride parameter from the Control Authority Monitoring Event was of 0.53 mg/l. If otherwise disposed of, a liquid waste with a vinyl chloride concentration greater than 0.2 mg/l would meet the definition of EP Toxicity, that is, carrying a hazardous waste code

under the Resource Conservation and Recovery Act (RCRA, 40 CFR Part 261). The Sewer Use Ordinance prohibits the discharge of a "material considered a hazardous waste".

Prohibited Discharge: The pollutant analysis as monitored by the DISCHARGER on May 3, 2012 Self-Monitoring Event has constituted a violation of the Ypsilanti Township Sewer Use Ordinance (#2001-280) and the PERMIT. The analytical result for the vinyl chloride parameter from the Self-Monitoring Event was of 1.1 mg/l. If otherwise disposed of, a liquid waste with a vinyl chloride concentration greater than 0.2 mg/l would meet the definition of EP Toxicity, that is, carrying a hazardous waste code under the Resource Conservation and Recovery Act (RCRA, 40 CFR Part 261). The Sewer Use Ordinance prohibits the discharge of a "material considered a hazardous waste".

() As of the DISCHARGER failed to meet the following monitoring/reporting requirement(s) of the PERMIT:

() As of the DISCHARGER was in violation of the following other specific condition(s) of the PERMIT:

III. NOTICE OF VIOLATION

THEREFORE, THE DISCHARGER IS HEREBY NOTIFIED THAT:

1. It is in violation of the Permit.
2. The cited violation(s) require the following:

The YCUA received written notification on June 20, 2012 that the DISCHARGER has changed the treatment process in response to a May 3, 2012 prohibited discharge violation for the vinyl chloride concentration. The DISCHARGER shall repeat the sampling and pollutant analysis for the vinyl chloride parameter and submit in writing to the YCUA, the results of this analysis on or before August 9, 2012. If the vinyl chloride concentration is greater than 0.2 mg/l the DISCHARGER shall submit with the sampling and analysis result information detailing what the DISCHARGER is doing to prevent the reoccurrence of this type of violation.

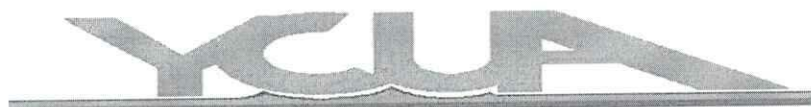
3. Failure to correct this violation within the stated time shall constitute a further violation of the ORDINANCE and/or the PERMIT, and may subject the DISCHARGER to escalated enforcement response including, but not limited to, civil assessments, criminal prosecution and/or service termination.
4. This Notice is entered on July 9, 2012 and shall be effective upon receipt by the DISCHARGER.

Signed:



Perry M. Thomas
YCUA Chief Compliance Office

Cc: YCUA Compliance Department File



2777 State Road, Ypsilanti, MI 48198-9112
Telephone No. (734) 484-4600; Fax No. (734) 484-4699

LABORATORY REPORT

CLIENT / FACILITY NAME	R.A.C.E.R. TRUST- CVO Site					
SAMPLE MATRIX:	INDUSTRIAL WASTEWATER (grab)					
SAMPLER SET-UP	NA					
SAMPLE COLLECTION	06/22/2012 10:09 AM					
ATTN:	Ms. Beth Landale – RACER ; Luther Blackburn - YCUA					
REPORT DATE:	06/28/2012					
SAMPLE DATE:	06/22/2012					
PARAMETER	MDL	UNITS	RESULTS	DATE OF ANALYSIS	METHOD	LAB TECH
pH (field reading)	---	s.u.	6.83	06/22/2012	SM 4500-H ⁺	LM
Biochemical Oxygen Demand (BOD)	2.0	mg/L	NA		SM 5210B	
Chemical Oxygen Demand (COD)	40	mg/L	NA		HACH 8000 /SM 5220D	
Total Suspended Solids (TSS)	1.0	mg/L	NA		SM 2540D	
Nitrogen, Ammonia	0.05	mg/L	NA		EPA 350.3	
Fats, Oil and Grease (FOG)	5	mg/L	NA		EPA 1664	
Phosphorus, Total	0.02	mg/L	NA		EPA 365.2	
Phenol	10	ug/L	NA		EPA 420.1	
VOC's	1	ug/L	See Attached	06/26/2012	EPA 624	BA/RG
PCB's	0.2	ug/L	NA		EPA 608	
Mercury	0.2	ug/L	NA		EPA 245.1	

APPROVED BY


Steve Wyzgoski, Chemist

ND = Not detectable at or above the MDL
MDL = Method detection limit
NA = Not Analyzed



2105 Pless Drive · Brighton, Michigan 48114 · Phone (810) 229-7575 · Fax (810) 229-8650 · E-mail bai-brighton@sbcglobal.net

June 27, 2012

Ypsilanti Comm. Utilities Auth.
2777 State Rd.
Ypsilanti, MI 48198

Subject: Racer CVO Monitoring Event
CA#65

Dear Mr. Wyzgoski :

Thank you for making Brighton Analytical, L.L.C. your laboratory of choice. Enclosed are the results for the samples submitted on 06/22/2012 for the above mentioned project. Duplicate copies can be supplied at your request for a fee of \$20.00 per copy.

The invoice for this project will be mailed with copy of report. If you have any questions concerning the invoice or the data, please don't hesitate to contact our office. Please reference Brighton Analytical, L.L.C. project ID 19868 when calling with any questions regarding this project.

Sincerely,
Brighton Analytical, L.L.C.





TM

Brighton Analytical, L.L.C.
2105 Pless Drive
Brighton, Michigan 48116
Phone: (810) 229-7575 FAX: (810) 229-8650
e-mail: bai-brighton@sbcglobal.net

Sample Date: 6/22/2012

Submit Date: 6/22/2012

Report Date: 6/27/2012

BA Report Number: 19868

BA Sample ID: BX00557

Project Name: Racer CVO Monitoring Event
Project Number: CA#65
Sample ID: Racer CVO Effluent

To: Ypsilanti Comm. Utilities Auth.

2777 State Rd.

Ypsilanti, MI 48198

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
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Volatile Analysis

Acetone	Not detected	ug/L	200	SW846 8260B	RG	6/26/2012
Acrylonitrile	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Benzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Bromobenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Bromochloromethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Bromodichloromethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Bromoform	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Bromomethane(Methyl Bromide)	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
2-Butanone (MEK)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Carbon disulfide	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Carbon tetrachloride	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Chlorobenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Chloroethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Chloroform	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Chloromethane(Methyl Chloride)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
cis-1,2-Dichloroethene	33	ug/L	10	SW846 8260B	RG	6/26/2012
cis-1,3-Dichloropropene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Cyclohexane	Not detected	ug/L	100	SW846 8260B	RG	6/26/2012



TM

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Brighton, Michigan 48116
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e-mail: bai-brighton@sbcglobal.net

To: Ypsilanti Comm. Utilities Auth.
2777 State Rd.
Ypsilanti, MI 48198

Sample Date: 6/22/2012
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BA Report Number: 19868
BA Sample ID: BX00557

Project Name: Racer CVO Monitoring Event
Project Number: CA#65
Sample ID: Racer CVO Effluent

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
1,2-Dibromo-3-Chloropropane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Dibromochloromethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,2-Dibromoethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Dibromomethane(Methylene Bromide)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,2-Dichlorobenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,3-Dichlorobenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,4-Dichlorobenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Dichlorodifluoromethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,1-Dichloroethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,2-Dichloroethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,1-Dichloroethene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,2-Dichloropropane	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
Diethyl ether	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
Diisopropyl Ether(DIPE)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Ethyl benzene	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
Ethyltertiarybutylether(ETBE)	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
2-Hexanone(Methyl Butyl Ketone)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Isopropylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Methyl iodide(Iodomethane)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Methyl(tert)butyl ether(MTBE)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012



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2777 State Rd.
Ypsilanti, MI 48198

Sample Date: 6/22/2012
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Report Date: 6/27/2012

BA Report Number: 19868
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Project Name: Racer CVO Monitoring Event
Project Number: CA#65
Sample ID: Racer CVO Effluent

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
4-Methyl-2-pentanone(MIBK)	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
Methylene chloride	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
2-Methylnaphthalene	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
Naphthalene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
n-Butylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
n-Propylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
p-Isopropyl Toluene(p-Cymene)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
sec-Butylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Styrene	Not detected	ug/L	500	SW846 8260B	RG	6/26/2012
Tertiary Butyl Alcohol(TBA)	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
tertiaryAmylmethylether(TAME)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
tertiaryButylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,1,1,2-Tetrachloroethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,1,2,2-Tetrachloroethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Tetrachloroethene	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
Tetrahydrofuran(THF)	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Toluene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
trans-1,2-Dichloroethene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
trans-1,3-Dichloropropene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
trans-1,4-Dichloro-2-butene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012



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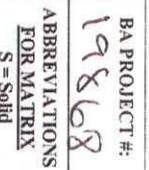
Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
1,2,3-Trichlorobenzene	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
1,2,4-Trichlorobenzene	Not detected	ug/L	50	SW846 8260B	RG	6/26/2012
1,1,1-Trichloroethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,1,2-Trichloroethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Trichloroethene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Trichlorofluoromethane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,2,3-Trichloropropane	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,2,3-Trimethylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,2,4-Trimethylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
1,3,5-Trimethylbenzene	Not detected	ug/L	10	SW846 8260B	RG	6/26/2012
Vinyl chloride	530	ug/L	10	SW846 8260B	RG	6/26/2012
Xylenes(total)	Not detected	ug/L	30	SW846 8260B	RG	6/26/2012

DL=Reported detection limit for analytical method requested. Some compounds require special analytical methods to achieve MDEQ designated target detection limits (TDL).

Released by:
Date:

6/27/12

Elevated volatile dl due to sample matrix.



PAGE ____ OF ____
COMPANY/MAILING ADDRESS:

Ypsilanti Community Utilities Authority

2777 State Road

Ypsilanti MI 48198

ATTN: Steve Wyzanski

PHONE: 724 544 7455

FAX OR EMAIL: 734.544.7160 / enr@zoochi@ucsd.edu

Summae received within hold time of 60s

Transcription of sample 1000

—

PHS verified in login: ☐ yes ☒ no

Headspace/bubbles in VOA's? yes/ ☒ no ☐ n/a

Sample containers and COC match?	yes	no
	☒	☐

BILLING ADDRESS (IF REQUIRED)

1000 JOURNAL OF POST KEYNESIAN ECONOMICS

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Drinking H ₂ O	EAT TO LIVE	Yes	No
1	1	1	1
2	2	2	2
3	3	3	3
4	4	4	4
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97	97	97	97
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99	99	99	99
100	100	100	100

Chlorinated water supply: ☐ yes ☐ no
AMT: _____

MCL failure:	yes	no
0	0	0
1	0	0
2	0	0
3	0	0
4	0	0
5	0	0
6	0	0
7	0	0
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88	0	0
89	0	0
90	0	0
91	0	0
92	0	0
93	0	0
94	0	0
95	0	0
96	0	0
97	0	0
98	0	0
99	0	0

Client notified (date/time/initials): _____

old" on all analyses

•

RECEIVED BY:

1. *Journal of the American Medical Association*, 1997; 278: 1019-1024.
