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STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

February 16, 2012

CERTIFIED MAIL 7010 3090 0003 5245 3257

Mr. Dave Favero
RACER
2930 Ecorse Road
Ypsilanti, Michigan 48198

Dear Mr. Favero:

SUBJECT: Storm Water Compliance Inspection
Certificate of Coverage MIS120003
GM-Powertrain Saginaw (RACER Saginaw Nodular Iron Property)

Staff of the Department of Environmental Quality (DEQ), Water Resources Division (WRD) conducted an inspection of the facility formerly owned by General Motors which was located at 2100 Veterans Memorial Parkway, in the NE ¼ of Section 8 of Buena Vista Township on January 25, 2012. This office conducts compliance inspections and reviews the Storm Water Pollution Prevention Plans (SWPPP) for Saginaw County facilities. The DEQ staff were accompanied by Mr. Steve Hoevemeyer of Conestoga Rovers and Associates, during the inspection.

At the time of the inspection the facility did not have storm water permit coverage. The new owners, Revitalizing Auto Communities Environmental Response (RACER) had not applied for storm water permit coverage. An electronic submittal of a Notice of Intent was received by me on January 25, 2012. An application for coverage was submitted and received by the DEQ, WRD on February 3, 2012.

From discussions with Mr. Hoevemeyer and my observations at the facility, it appears that the secondary lagoons are leaking. In addition there are still storm water discharges from the area where the remaining classified sands are stored.

There has been a meeting set up for February 23, 2012, to discuss the permit application for the proposed discharges from the secondary lagoons and the storm water discharges from the other areas of the facility that were covered by the Certificate of Coverage MIS120003.

In addition, this letter provides review, comments, and requests specific improvements in the SWPPP for your facility.

The SWPPP was received via Email on January 25, 2012. The Michigan General Permits for Storm Water Associated With Industrial Activity references the review of the SWPPP in part I, section C, subsection 4, paragraph d. The District Supervisor or authorized representative may notify the permittee at any time that the SWPPP does not meet minimum requirements and why it does not meet the meet minimum requirements. The permittee shall make the required changes to the plan within 30 days after such notification from the District Supervisor or authorized

representative, and shall submit to the District Supervisor a written certification that the requested changes have been made.

The SWPPP for the RACER operations, located at 2100 Veterans Memorial Parkway, in the NE ¼ of Section 8 of Buena Vista Township, Saginaw County, Michigan, has been reviewed. Enclosed is a list of corrections that we request be made in the plan. The list of corrections is broken into five categories: site map, identification of significant materials, nonstructural controls, structural controls, and signatures. The corrections or additions will be numbered for easier reference within these categories.

Site Map:

The following features need to be included on the site map:

1. Areas where significant materials are stored or used, (inside and outside of buildings), should be indicated on the map.
2. Number the storm water inlets and outfalls.
3. Outline the drainage areas contributing to each inlet or outfall. Show the drainage patterns and the direction of drainage, (with arrows), on the site map.
4. Identify all structural runoff controls.
5. Identify all areas of vegetation.
6. Identify areas of exposed erodible soils.
7. Name the receiving waters and identify them on the map.

The map submitted electronically as part of the SWPPP is too small to be useful. I requested that Mr. Mike Tomka (CRA) send me a blueprint size map of the facility.

Identification of Significant Materials:

1. Identify the significant materials located at the facility. Add liquid waste materials stored in the lagoons.
2. Identify the ways that each significant material has or may have the reasonable potential to become exposed to storm water.
3. Identify the locations where significant materials are stored or used, (inside and outside).
4. Identify the outfalls through which the materials could be released.

Nonstructural Controls:

Identify and address the seven nonstructural controls that must be included in your plan. See pages 18-22 of the Certified Operator Training Manual for Industrial Storm Water or Part 1, Section C.2.a-g of the Michigan General Permits for Storm Water Associated With Industrial Activity. Include the date that the proposed nonstructural controls will be implemented and the frequency in which the nonstructural controls will be performed.

1. **Preventative Maintenance:** There are basic areas to be observed for preventative maintenance. At a minimum these should include: water levels in the lagoons (which are currently being monitored), berms around lagoons, areas prone to erosion, and crocks with sump pumps. Please include a copy of the routine maintenance inspection sheet with your plan.
2. **Comprehensive Inspections:** Include the months the comprehensive inspections will be performed. Storm water permits require quarterly inspections or an alternatively approved schedule. An annual inspection will not meet these conditions.
3. **Good Housekeeping:** Agreed that this section is not currently applicable to the facility. However, when remediation activities commence this area will need to be addressed. Describe the procedures used at your facility to keep it clean. Please include a copy of the good housekeeping inspection sheet with your plan. The good housekeeping inspection sheet and the routine maintenance inspection sheet may be combined into one routine inspection sheet.
4. **Material Handling:** Will need to be addressed once remediation activities resume at the facility. Describe the material handling that takes place at the facility. This should include the receiving, storage, and shipping of the significant materials at the facility. Handling of wastes should also be included. Spill response is part of the material handling. Included in the spill response should be the department phone contact numbers.
5. **Soil Erosion:** List any areas that are prone to soil erosion. Include controls for dealing with the resulting sedimentation. This should include classified sands, clay stock piles (washout areas), and remediation areas. Straw bales are not adequate controls for soil erosion and sedimentation control. A Soil Erosion and Sedimentation Control (SESC) Plan will need to be developed. An SESC Permit will need to be obtained from Saginaw County Public Works Commission before earth moving activities commence.
6. **Employee Training:** This will need to be developed for onsite remediation personnel. Attach a copy of the employee training materials.
7. **Significant Materials:** List the significant materials that are expected to be in the storm water runoff after the implementation of the other nonstructural controls. Currently this would include the fluids leaking from the secondary lagoons.

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Structural Controls: Adequately addressed for current operations but will need modifications when remediation commences at the facility. This would include the controls in the SESC Plan.

Describe any structural controls that are used at the facility to prevent contamination of storm water or that are used to treat contaminated storm water. Include the date that the proposed structural controls will be installed and a maintenance schedule for each control.

Signatures:

The plan must be signed by the certified operator, and by either the permittee or an authorized representative in accordance with Part I.C.6. of the Michigan General Permits for Storm Water Associated With Industrial Activity. Indicate the name and the assigned number of the certified storm water operator.

To assist you in improving the plan for your facility, we are enclosing a SWPPP checklist that we use when reviewing the SWPPP for a facility. The checklist includes the minimum requirements of the Michigan General Permits for Storm Water Associated With Industrial Activity.

Please send a copy of the SWPPP by March 20, 2012, when the corrections and additions to the SWPPP have been made. If you are unable to make the changes within 30 days please state the reason and provide a date when the changes to the plan will be made.

This Compliance Letter does not relieve the facility of any liability for past or continuing violations of Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Please note that failure to respond to this Compliance Letter may result in escalated administrative or legal enforcement actions.

If you have any questions regarding the SWPPP or other issues concerning the Michigan General Permits for Storm Water Associated With Industrial Activity, please contact me at 989-894-6282, noblek@michigan.gov; or DEQ, 401 Ketchum Street, Bay City, Michigan 48708.

Sincerely,



Keith Noble
Environmental Quality Analyst
Storm Water Program

Enclosure

cc: Mr. Steve Hoevemeyer, Conestoga-Rovers and Associates, shoevemeyer@croworld.com
Mr. Mike Tomka, Conestoga-Rovers and Associates, mtomka@croworld.com
Ms. Christine Aiello, DEQ, WRD (electronic)
Mr. Brian Rudolph, DEQ, WRD (electronic)

**SWPPP ANNUAL REVIEW CHECKLIST
MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
WATER BUREAU**

Date: _____ By: _____

Facility Name: _____

Address: _____

County: _____ SIC Code: _____

Permit Number: _____ COC No.: _____ Expiration Date: _____

Permitee: _____

Certified Operator(s) Name/Number/Expiration: _____

[Yes (Y), No (N) or Not Applicable (N/A)]

1. Source Identification

To identify potential sources of significant materials that can pollute storm water and subsequently be discharged from the facility, the SWPPP shall, at a minimum, include the following items:

- a. A site map identifying the following:
- | | |
|--|--------------------------|
| 1) buildings and other permanent structures | <input type="checkbox"/> |
| 2) storage or disposal areas for significant materials | <input type="checkbox"/> |
| 3) secondary containment structures and what they contain | <input type="checkbox"/> |
| 4) storm water discharge outfalls (numbered for reference) | <input type="checkbox"/> |
| 5) location of storm water inlets contributing to each outfall | <input type="checkbox"/> |
| 6) location of NPDES permitted discharges other than storm water | <input type="checkbox"/> |
| 7) outlines of the drainage areas contributing to each outfall | <input type="checkbox"/> |
| 8) structural runoff controls or storm water treatment facilities | <input type="checkbox"/> |
| 9) areas of vegetation | <input type="checkbox"/> |
| 10) areas of exposed and/or erodible soils | <input type="checkbox"/> |
| 11) impervious surfaces (roof, asphalt, concrete) | <input type="checkbox"/> |
| 12) name and location of receiving water(s) | <input type="checkbox"/> |
| 13) areas of known or suspected impacts on surface waters designated under the Natural Resources and Environmental Protection Act, P.A. 451, Part 201, of 1994 (formerly Act 307). | <input type="checkbox"/> |
- b. A list of all significant materials that could enter storm water.
For each material listed, the plan shall include:
- | | |
|---|--------------------------|
| 1) Ways in which each type of material has been or has reasonable potential to become exposed to storm water (e.g., spillage during handling; leaks from pipes, pumps, vessels; contact with storage piles; waste handling/disposal; deposits from dust or overspray, etc). | <input type="checkbox"/> |
|---|--------------------------|

2) An evaluation of the reasonable potential for contribution of significant materials to runoff from at least the following areas or activities:

- a. loading, unloading, and other material handling operations
- b. outdoor storage including secondary containment structures
- c. outdoor manufacturing or processing activities
- d. significant dust or particulate generating processes
- e. discharge from rooftop vents, stacks and air emission controls
- f. on-site waste disposal practices
- g. maintenance and cleaning of vehicles, machines and equipment
- h. areas of exposed and/or erodible soils
- i. sites of environmental contamination listed under the Natural Resources and Environmental Protection Act, P.A. 451, part 201, of 1994 (formerly Act 307).
- j. areas of significant material residues
- k. areas where wild or domestic animals congregate and deposit waste
- l. other areas where storm water may contact significant materials

3) Identification of the outfall or outfalls through which the material may be discharged if released.

c. A listing of oil and other polluting materials that have been spilled or leaked over the three years prior to the completion of the plan; the date, volume and exact location of release; and the action taken to clean up the material and /or prevent exposure to storm water runoff or contamination of surface waters of the state.

d. Is there a Total Daily Maximum Load (TMDL) for the receiving water
If yes, does the plan identify related controls

e. A summary of existing storm water discharge sampling data (if available) describing pollutants in storm water discharges associated with industrial activity at the facility. This summary shall be accompanied by a description of the suspected source(s) of the pollutants detected.

2. Preventive Measures and Source Controls, Non-Structural

To prevent significant materials from contacting storm water at the source, the plan shall include at a minimum:

a. A description of a program for routine preventive maintenance which includes requirements for inspection and maintenance of storm water management and control devices (e.g., cleaning of oil/water separators and catch basins) as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters. A log of the inspection and corrective actions shall be maintained on file by the permittee.

- b. A schedule for comprehensive inspection of equipment, plant areas, and structural pollution prevention and treatment controls to be performed semi-annually or quarterly depending on the permit requirements. The comprehensive inspection reports shall contain compliance certification.
- c. A description of good housekeeping procedures to maintain a clean, orderly facility.
- d. The plan shall specify material handling procedures and storage requirements for significant materials. Equipment and procedures for cleaning up spills shall be identified in the plan and made available to the appropriate personnel. The procedures shall identify measures to prevent the spilled materials from being discharged into storm water. The plan may include reference to a PIPP or SPCC plan.
- e. Identification of areas which have a high potential for significant soil erosion. The plan shall also identify measures used to control soil erosion and sedimentation.
- f. A description of employee training programs which will be implemented to inform appropriate personnel at all levels of responsibility of the components and goals of the plan. The plan shall identify periodic dates for such training.
- g. Identifications of actions to comply with TMDL requirements.
- h. Identification of significant materials expected to be present in storm water discharges following implementation of non-structural preventative measures and source controls.

3. Structural Controls for Prevention and Treatment

If non-structural controls are not sufficient to prevent uncontaminated storm water from contacting or being contacted by significant materials or if preventive measures are not feasible or are inadequate to keep significant materials out of storm water, the plan provides a description of the location, function, and design criteria of structural controls for prevention and treatment.

4. Keeping Plans Current

Is the plan being reviewed annually and are written summaries of the reviews maintained?

5. Certified Operator Update

If the certified operator is new/changed, has the Department been notified?

6. Signature and SWPPP Review

Has the plan been signed by the certified operator and the permittee or a designated representative?

