



CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
INDUSTRIAL WASTE CONTROL DIVISION

303 S. LIVERNOIS AVENUE
DETROIT, MICHIGAN 48209-3070
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WWW.DETROITMI.GOV

CERTIFIED MAIL

June 10, 2015

Mr. David Favero
RACER Trust
500 Woodward Avenue, Suite 1510
Detroit, MI 48226

Dear Mr. Favero:

Re: Renewal of Special Discharge Permit No. SD6-94508
Site: RACER Trust site
12950 Eckles Road in Livonia, MI 48150

Enclosed is your Special Discharge Permit issued by the Detroit Water and Sewerage Department (DWSD) to discharge remediated groundwater from the above site into the Detroit sewer system. The DWSD 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 DWSD can rescind this permit at any time if the discharge shows noncompliance with the discharge limitations or if the DWSD 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 Ms. Tessy Jose at (313) 297-5878 or myself at (313) 297-5882.

Sincerely,

Jayakumar Pallegar, P.E.
Sr. Assoc. Engineer
Industrial Waste Control Division

JP/TJ/yr
Enclosure

cc: Mr. Christopher J. Meincke
Conestoga-Rovers & Associates
14496 Sheldon Road, Suite 200
Plymouth, MI 48170



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SPECIAL DISCHARGE PERMIT
PERMIT NO.: SD6-94508

SECTION A: GENERAL INFORMATION

Site Information: RACER Trust site/ Former GM Livonia
12950 Eckles Road
Livonia, MI 48150

Consultant Information: Conestoga-Rovers & Associates
14496 Sheldon Road, Suite 200
Plymouth, MI 48170

Mr. Christopher J. Meincke
Tel: (734) 453-5123

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

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 DWSD at least ninety (90) days before the permit's expiration date.

Effective Date: July 1, 2015

Expiration Date: June 30, 2019

Issued by:

Authorized by:

Jayakumar Pallegar, P.E.
Sr. Assoc. Engineer
Industrial Waste Control Division

Joe Belen, P.E.
Chemical Engineer
Industrial Waste Control Division

SECTION B: DISCHARGE LIMITATIONS

1. Representative Sampling Location/Discharge Point:

Sampling Location: Final pH adjustment tank T12 (near effluent pipe)

Discharge Point: MH located 42.5' north of Amrhein Road and 715' east of Eckles Road

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

PARAMETER		Daily Max. (mg/l)	Self-Monitoring Required (Y/N)
Arsenic	As	1.0	No
Biochemical Oxygen Demand	BOD	7500.0	No
Cadmium	Cd	1.0	No
Chromium	Cr	2.77	Yes
Copper	Cu	2.5	No
Cyanide (Available)	AVCN	1.0	No
Fats, Oil or Grease	FOG	1500.0	Yes
Iron	Fe	1000.0	No
Lead	Pb	0.69	Yes
Mercury	Hg	Non-detect*	Yes
Nickel	Ni	3.98	Yes
Phosphorus	P	250.0	No
Silver	Ag	1.0	No
Total PCB	PCB	Non-detect*	Yes
Total Phenolic Compounds	PHENOL	1.0	No
Total Suspended Solids	TSS	7500.0	Yes
Zinc	Zn	2.61	Yes
Acidity/Alkalinity (pH)	pH	5.0 - 11.5 Units	Yes
Total Toxic Organics (TTO)**		2.13	Yes

* Quantification level shall not exceed 0.2 ppb based on US EPA methods 245.1 & 608 respectively.

**A minimum of one (1) sample per year shall be analyzed. See Attachment A for complete list TTOs.

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 µg/l or less. The detection limit must be indicated in the wastewater analytical report. Matrix interference must be specified where applicable.

2. Permit Definition

The site is the former Delphi Chassis Livonia Plant. 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 impacted groundwater. Since February 2010, the site was owned by Motor Liquidation Company, however, currently it is under Racer Trust who is liable for all the matters of the site.

Groundwater is treated by collecting it along the south boundary of the site in a French drain collection system and then pumping it from French drain sump, through bag filters, into chromium reduction tanks. From there water flows to two (2) tanks where pH is raised using recycled sludge and magnesium lime slurry. A Polymer is added and the water enters a flocculation tank. The solids are settled out in a Lamella clarifier. The settled sludge is pumped to a holding tank for dewatering and disposal. The treated water is collected in surge tank T10 and then passed through a polishing sand filter and collected in tank T12 for final pH adjustment. The final treated wastewater from tank T12 is discharged to sewer system.

3. Discharge Flow Rate

The maximum discharge rate from remediation site shall not exceed 100,000 gallons per day (facility discharges 400 gallons every 20 to 60 minutes). The treatment system operates 24 hours per day, with maximum flow rate of 75 gpm. Any plans to increase the flow rate must be approved in writing by the DWSD prior to implementation.

SECTION C: MONITORING REQUIREMENTS

1. Analytical Requirements

For the permit's time duration, the company shall monitor and analyze the discharge once a month.

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

SECTION D: REPORTING REQUIREMENTS

- a) For the permit's duration, the company shall submit the analytical data to the DWSD every six (6) months.
- b) In addition to the laboratory analysis, each report shall include the following information:
 - i) Reporting period, date of sampling, sampling location and total flow to date
 - ii) Certification that the analyzed discharge is, or is not in compliance with the permit discharge limits
 - iii) Copy of the maintenance logbook. (Refer to Section E, paragraph 8)
 - iv) 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 Detroit sewer system,
 - b) Notify the Department within 24 hours of becoming aware of the violation, and
 - c) Arrange a meeting with the Industrial Waste Control Division to discuss corrective actions prior to resumption of discharge.
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.
3. The company must comply with the General and Specific Pollutant Prohibitions described in the City of Detroit Ordinance 08-05.
4. No other discharge beyond those described and authorized by this permit shall occur without written approval from the DWSD.
5. Non-compliance with any term or condition of this permit shall constitute a violation of the City of Detroit 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 Treatment Units
 - c) Samples taken
 - d) Breakdown of operations with:
 - i) Reason for breakdown
 - ii) Actions taken to prevent reoccurrence of breakdown
9. The company shall notify the DWSD in writing or by telephone at least twenty-four (24) hours prior to initial discharge.
10. Any violations of the permit parameter limitations shall be subjected to a penalty of \$500.00 per violation per day.

Total Toxic Organics

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

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