



**CONESTOGA-ROVERS
& ASSOCIATES**

14496 Sheldon Road, Suite 200, Plymouth, Michigan 48170
Telephone: 734-453-5123 Facsimile: 734-453-5201
www.CRAworld.com

March 29, 2012

Reference No. 017303

Luther Blackburn
Industrial Pretreatment Supervisor
Ypsilanti Community Utilities Authority
2777 State Road
Ypsilanti, Michigan 48198

Dear Mr. Blackburn:

Re: Wastewater Discharge Permit Application
Groundwater Remediation Treatment System
Former General Motors Company Vehicle Operations (CVO) Site
2901 Tyler Road
Ypsilanti, Michigan

Conestoga-Rovers & Associates, Inc. (CRA), on behalf of the RACER Trust, has prepared this letter and the attached permit application for the discharge of process wastewater to the Ypsilanti Community Utility Authority (YCUA) sanitary sewer system associated with environmental remediation activities at the former General Motors CVO property located at 2901 Tyler Road in Ypsilanti, Michigan (Site). An industrial user permit (#RA 6-12) was issued on June 14, 2011 for the discharge of process wastewater from the Site to the YCUA sewage treatment system. Groundwater was treated and discharged in approximately 16,000 gallon batches every 2 to 3 weeks between June 2011 and November 2011. Samples were collected and reports were submitted as per the permit requirements. Groundwater will be treated and discharged in a similar manner during 2012.

Information regarding the Site contamination is presented below, and the completed permit application is included as Attachment A to this letter. Figures are included as Attachment B, analytical data representative of influent, midpoint, and effluent samples of the treatment are presented in Attachment C. The groundwater treatment log and a copy of the previous permit are also provided in Attachment C. The effluent results during 2011 discharge show that the discharge is compliant with Sec. 62-179(26) of the Sewer Use Ordinance (i.e., a material that is not considered a hazardous waste under RCRA).

Equal
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REGISTERED COMPANY FOR
ISO 9001
ENGINEERING DESIGN



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Site Background

The Site is a portion of the former Willow Run Assembly Plant which was owned/operated by Ford, Kaiser-Frazer or GM since early 1940s. Based on investigations to date, including reviews of historical aerial photographs, historical operations, soil borings and test pits, it is evident that industrial waste was buried in many locations on this portion of former Assembly Plant property.

Investigations completed at the Site have identified soils and groundwater impacted with volatile organic compounds (VOCs), primarily chlorinated VOCs. In addition, buried debris and dense non-aqueous phase liquid (DNAPL) were observed along the southern bank of Tyler Pond. A sheet pile wall was installed in October 2004 to prevent DNAPL from migrating into Tyler Pond (see Figure 1). Water accumulating behind this sheet pile wall has elevated levels of chlorinated VOCs based on the presence of the DNAPL. The main constituents detected in the DNAPL are trichloroethylene (TCE) (approximately 40%) and polychlorinated biphenyls (PCBs).

Wastes generated from remediation efforts at this Site have never been classified as a listed waste. As identified above, the contamination stems from historical dumping at the Site. Several attempts were made to identify sources, such as reviewing historical photographs, documents, drawings and records. Since the material originally dumped cannot be identified, the waste has never been identified as listed. To the best of the permittee's knowledge, the proposed discharge is not a listed hazardous waste.

Supplemental Information for Permit Application

Section H of the attached permit application requires the applicant to provide justification in order to utilize time proportioned composite samples for discharge compliance sampling. In accordance with requirement A(2) of Section H, the wastewater from the proposed treatment process will be a batch discharge which will be treated and released at a consistent flow rate. Additionally, prior to treatment, the wastewater will be collected in a 16,000-gallon batch/equalization tank, which will provide a homogeneous mixed wastewater prior to each batch treatment. Based upon these conditions, we propose to continue the use of time proportioned composite samples as was completed in compliance with our permit in 2011 for the purpose of compliance demonstration.



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If you have any questions, please do not hesitate to contact me.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Beth Landale

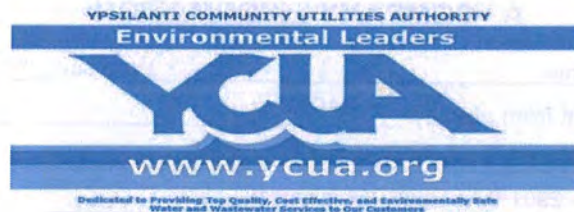
ML/bw/13/Det.

Encl: Attachment A – Wastewater Discharge Permit Application
Attachment B – Figures
Attachment C – Site Analytical Data, treatment logs, and
Industrial User Permit # RA 6-12

cc: Grant Trigger – RACER
David Favero - RACER
Scott Adamowski – CRA
Matthew Lamb – CRA

ATTACHMENT A

COMPLETED PERMIT APPLICATION



Wastewater Discharge Permit Application

For YCUA Use Only	Inspector _____
COMPANY NAME: _____	CITY: _____
Date received: _____	Amount Paid: \$ _____ Receipt # _____ Permit #: _____

In accordance with the Municipal Code, no Significant Industrial User (SIU) shall connect, discharge, cause, allow, or permit any discharge, into the Sanitary Sewer System except in accordance with a Wastewater Discharge Permit issued by the Director. The Ypsilanti Community Utilities Authority determines a SIU to be a non-domestic user that meets one or more of the following criteria:

- ☐ All industrial users subject to Categorical Pretreatment Standards under 40 CFR Part 403.6 and 40 CFR Chapter 1 Subchapter N.
- ☐ Any other industrial user that discharges an average of 25,000 gallons per day or more of process wastewater to the YCUA Wastewater Treatment Plant (excluding sanitary, non-contact cooling, and boiler blowdown water).
- ☐ Contributes a process wastestream (excluding sanitary, non-contact cooling, and boiler blowdown water) that makes up five percent or more of the average dry weather hydraulic or organic capacity of the YCUA Wastewater Treatment Plant.
- ☐ Designated as a SIU by the YCUA Industrial Pretreatment Program Administrators on the basis that the industrial user has a reasonable potential to adversely affect the YCUA Wastewater Treatment Plant operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

An electronic version of this application is available at www.ycua.org.

A completed permit application is required to be submitted to the Ypsilanti Community Utilities Authority (YCUA) by all Significant Industrial Users. Upon receipt of a completed application, the YCUA will invoice the applicant a permit processing fee. The permit processing fee must be paid prior to a discharge permit being issued. Please be advised that the YCUA may take up to 90 days to process and issue a discharge permit.

The completed permit application shall be mailed to the following:

Attn: Industrial Pretreatment Supervisor
Ypsilanti Community Utilities Authority
2777 State Road
Ypsilanti, MI 48198-9112.

Please contact the YCUA Compliance Department at (734) 484-4600 ext. 123 with any questions regarding the application.

A. COMPANY INFORMATION

Revitalizing Auto Communities Environmental

Company Name: Response (RACER) Trust Web site: www.racertrust.org

Doing Business As (dba) (if different from above): RACER

Business/Mailing Address: 2930 Ecorse Road, Ypsilanti, MI ZIP: 48198

Discharge Address: Site Address - 2901 Tyler Road, Ypsilanti, MI ZIP: 48198

Telephone (Main): 313-486-2908 Fax Number: _____

Date Current Operation began: NA Date Pretreatment Operation began: approx. 16,000 gallon batches

Assessor's Parcel Number (APN): K-11-12-300-006 every 2-3 weeks between

Total Land Area: 22 Acres sq. ft. June-November 2011. The

Size of Facility (Please estimate sizes of areas that comprise the facility): pretreatment operation began

Date construction of the facility began: NA on June 6, 2011, however, the

Manufacturing / Assembly Area: NA sq ft first discharge occurred on

Wastewater Treatment Area: skid mounted units < 1000 sq ft June 20, 2011

Total Floor Area: NA sq ft

SIGNATORY REQUIREMENTS

All applications, reports, or information submitted to the Ypsilanti Community Utilities Authority must contain the following certification statement and be signed as required in Sections a, b, c, or d below:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or; the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second quarter 1990 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.
- The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.
- By a duly authorized representative of the individual designated in paragraph a, b, or c of this section if:
 - the authorization is made in writing by the individual described in paragraph a, b, or c;
 - the authorization specifies wither an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or a well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - The written authorization is submitted to YCUA.
- If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for the environmental matters for the company, a new authorization satisfying the requirements of paragraph d of this section must be submitted to YCUA prior to or together with an reports to be signed by an authorized representative.

Designated Signatory Authority (a representative meeting the criteria as described in paragraph a, b, or c of this section)

1) Name: Grant Trigger Title: Cleanup Mgr. Email: gtrigger@racertrust.org
Phone: 313-486-2908 Cell 313-670-6226 Pager: _____

Additional Signatory Authority

1) Name: David Favero Title: Deputy Cleanup Mgr. Email: dfavero@racertrust.org
Phone: 313-486-2908 Cell _____ Pager: _____

Authorization of additional signatory authority made by:

Name: _____ Title: _____

Date: _____ Signature: _____

Designated Facility Contact

2) Name: Beth Landale Title: CRA Project Mgr. Email: blandale@croworld.com
Phone: 734-357-5528 Cell 734-545-5423 Pager: _____

3) Alternate Contact on site: _____ Title: _____ Email: _____
Phone: _____ Cell _____ Pager: _____

NATURE OF BUSINESS

Description of business activity, products, or services: Remediation and redevelopment of former General Motors
Corporation properties.

Description of fabrication or manufacturing processes: None

List applicable Standard Industrial Classification or North American Industry Classification System Code(s):

1. NA
2. _____
3. _____
4. _____

PERSONNEL SCHEDULE

*Not applicable

	Office		First Shift		Second Shift		Third Shift	
	Number	Hours	Number	Hours	Number	Hours	Number	Hours
WEEKDAYS								
SATURDAYS								
SUNDAYS								

B. WATER USAGE AND DISCHARGE

Data over the past year should be used for all available flows. Engineering estimates may be substituted for new companies with no actual flow data and for waste streams that are not flow metered. The Average influent total should be within 10% of the total of Discharge, Evaporation, and Non-Discharging Flows. Differences of more than 10% must be explained.

INFLUENT FLOWS

(Identify all sources of water to your facility. Attach water bills for last year.)

Water Account Number or Well Number	Primary Use	Flow in Gallons per Day (GPD)	
		Ave.	Max.
Groundwater Collection - French Drain	Environmental Remediation	250	1,400

(The above may also include small volumes of purge water from area groundwater monitoring wells and occasional water associated with equipment decontamination. Characteristics of these will be similar to water collected in the french drain.) Additional remediation activities are expected to begin in July 2011. These activities may include excavation and will involve an increased rate of groundwater collection. The groundwater collected during these additional activities would be from the same area and of the same characteristics as what is currently permitted. YCUA will be informed once the schedule and approach is finalized for these additional remediation activities.

DISCHARGE FLOWS

(Average Wastewater Discharged to the Sanitary Sewer in GPD for last year)

Describe all process wastewater generating activities below (attach additional sheets if necessary).

Indicate whether each discharge is continuous during operation or if it is collected and discharged on a batch basis. Process wastewater is generated by any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, by-product, or waste product.

	Ave.	Max.
Process #1 Description: Groundwater collection from french drain (see Figure 1) Groundwater will be treated and discharged in ~12,000-16,000 gallon batches every 2 to 3 weeks.	440	625
	Based on 2011 discharge.	
Process #2 Description:		
Process #3 Description:		
Process #4 Description:		
Process #5 Description:		

Process #7 Description: _____

Process #8 Description: _____

Process #9 Description: _____

Process #10 Description: _____

Total Process Wastewater Flow (GPD) _____

Sanitary Usage (Use 15 gallons per day per employee unless metered) _____ NA

Cooling Tower Blowdown _____ NA

Boiler Blowdown _____ NA

Reverse Osmosis Reject Water _____ NA

Laundry Facility _____ NA

Restaurant/Kitchen/Cafeteria _____ NA

Recreational Facilities (e.g. swimming pools, water rides, etc.) _____ NA

Other _____

Total Non-Process Wastewater Flow (GPD) _____ 0

Total Discharge to the Sanitary Sewer (Process + Non-Process) _____ 440 625

*note batch process 12,000-16,000 gallons
every 2-3 weeks

EVAPORATIVE LOSS

#1 _____ Ave. NA Max

#2 _____

#3 _____

Total Evaporative Loss (GPD) _____

NON-DISCHARGING WATER USES

Irrigation/Landscaping _____ Ave NA Max

Trucked or Hauled Off-site _____ NA

Other _____ NA

C. WASTEWATER CHARACTERISTICS

(From the following list of wastewater characteristics, check those that apply to the wastewater generated in this facility **prior** to pretreatment.) **Please check all that apply.**

☐ Flammable ☒ Toxic Substances ☐ Acidic, pH < 5.0 ☐ Caustic, pH > 11.0 ☐ Heavy Metals ☒ Solvents ☐ Solid or Viscous Matter ☐ Petroleum Products	☐ Particles Larger Than 3/4" ☐ Suspended Solids ☐ High Biological Oxygen Demand (BOD) ☐ Ammonia ☐ Grease/Oil/Fats ☐ Temperature > 150 degrees F ☐ Other (specify) _____ ☐ _____
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D. ENVIRONMENTAL CONTROL PERMITS

List all other environmental control permits issued to this facility.

<u>Name of Permit</u>	<u>Permit No.</u>
EPA – Generator I.D. Number	MIK468293311
County of Washtenaw/Wayne – Environmental Health Permit	NA
State of Michigan – Hazardous Waste Generator Permit	NA
MDEQ Air Quality Division – Permit to Operate	NA
MDEQ NPDES permit	NA
Local Hazardous Materials Storage Permit (Fire Dept.)	NA
Radioactive Materials License	NA
Biohazard Waste Generation Registration	NA
Other: _____	_____
_____	_____

E. BUILDING AND PLUMBING LAYOUT, FLOW DIAGRAMS

***See Figures 1 and 2 attached.**

- (1) **Plumbing Layout:** On a separate sheet, draw to scale the building and plumbing layout of your facility (or provide blueprint showing same). Identify the location of sewer lines, wastewater process connections, water meters, storm drains, and any sampling points. **The proposed sampling point for evaluating wastewater compliance shall be clearly identified on this submittal.** Identify street locations, and N↑ on all drawings.
- (2) **Pretreatment System:** On a separate sheet, sketch your pretreatment system(s), if applicable. Show the routing of process waters from each wastewater-generating process to the treatment system that will address it. For example: high-pH rinses to pH-adjust, heavy metals wastestream to precipitation system, or kitchen wastes to a grease interceptor. Provide a list of treatment chemistry used. Show the flow of treated water from the treatment system to the sanitary sewer. Indicate all monitoring equipment, pH recorders, flow meters, ORP meters, sample points, etc.
- (3) **Block Flow Diagram:** On a separate sheet, draw a simple block diagram showing the flow of water, materials, and chemicals from start to final discharge point for each activity that generates wastewater. Identify all unit processes (blocks) and number these to correspond to numbers identifying processes on the building and plumbing layout.

F. PRETREATMENT

Check the pretreatment methods used in your facility. Indicate rated flow for each pretreatment method checked, and label the facility diagram accordingly.

	Capacity		Capacity
☐ Clarifier or Interceptor		☐ Biological Treatment	
☐ pH Adjustment		☐ Air Stripper/Scrubber	
☐ Ion Exchange		☐ Chemical Precipitation	
☐ Grease or Oil Separation		☐ Cyanide Destruction	
☐ Electrolytic Recovery		☐ Chromium Reduction	
☐ Wastestream Segregation (Including solvents)		☐ Ozonation	
☒ Filtration: () Screen (X) Bag () Filter Press			
☐ Silver Recovery:			
☒ Other: Granular Activated Carbon (GAC)			

Describe each pretreatment system checked above. (e.g. design capacity, physical size, loading rate, etc.). If no pretreatment exists, please explain. (Please attach additional sheets if necessary.)

Groundwater is collected from the french drain located along the sheetpile wall (see Figures 1 and 2) and is pumped into a 16,000 gallon equalization/batch tank. From the equalization/batch tank the groundwater will be pumped via a 2-inch transfer pump through a bag filtration unit (2 canisters in parallel) equipped with a 100-micron bag filters to remove suspended solids prior to the GAC units. Effluent from the bag filtration unit will then proceed through two 1,000 lb GAC vessels in series (lead/lag configuration) for removal of contaminants of concern (cis-1,2-dichloroethene trichloroethene, and vinyl chloride) prior to discharge to the YCUA sewer system through MH-6, the discharge location authorized in the permit issued on 6/14/2011

Explain how compliance is verified at each sample point. (e.g. In-house testing, certified outside lab, etc.):
 A certified outside laboratory will be used to complete sample analysis of a time weighted composite effluent sample from each batch discharge event. Samples will be analyzed for the contaminants of concern indicated listed in the permit issued on 06/14/2011.

If wastewater is treated and/or discharged in batches, complete the following for each of these wastestreams:

Number of batches discharged per year / month / week / day ... (circle one): 1-3

Average volume per batch: 13,376 gallons Based on June-Nov 2011 discharges.

Other comments on batch treatment, including material treated and treatment technology:

-See pretreatment system description above.

G. SAMPLING AND MONITORING

After pretreatment (if used), can wastewater streams be sampled prior to mixing with other waste streams? ☒ YES ☐ NO ☐ Not Applicable

If "NO" please explain: _____

All significant industrial users must provide the YCUA with an adequate monitoring point for sample collection purposes. The monitoring point must provide YCUA the ability to collect samples representative of your facility's discharge. Provide a written physical description (manhole, lift station, stilling well, etc.) of the proposed sampling/monitoring location including at least two (2) distances with direction from fixed objects (walls, equipment, fences, etc.) where samples will be collected from.

A 5-gallon bucket will be utilized as a stilling well at the end of pipe discharge to the YCUA designated discharge manhole.

Treated water will discharge from the effluent piping, cascade into the 5-gallon bucket and then overflow into the discharge manhole. This will provide YCUA with the ability to collect representative samples of the discharge.

Describe the wastewater discharge monitoring practices for your facility. Include the type of analytical tests and/or methods to be used, the frequency of testing, and the name of the person(s) who will perform the tests. Attach analytical data if available. Enclose a copy of any logs, check lists, forms, etc., which are maintained.

During each batch treatment and discharge event, effluent samples are collected and analyzed for the constituents listed in the permit issued on 06/04/11. Additional samples are collected for to monitor the status of the carbon treatment including samples of the influent (equalization/batch tank) and GAC unit midfluent (between lead/lag vessels). A copy of the last year's permit is provided in Attachment C. The influent, midfluent, and effluent results, and the groundwater treatment logs are also provided in Attachment C.

List sampling and monitoring equipment in place at your facility:

None

H. FLOW MEASUREMENT

***See supplemental permit information included in the cover letter.**

All permittees must collect flow proportioned composite samples unless it is demonstrated that time proportioned composite samples are representative of your facility's discharge. A composite sample is defined by the YCUA as a sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a time or flow proportional composite sample. A time proportional composite sample is composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow. A flow proportional composite sample is collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquots.

Your facility must submit the requirements of item A, B, or C with the completed application.

- A) Information on your facility's discharge that demonstrates time proportioned composite samples are representative of your facility's discharge. The submittal must indicate on which of the following bases you are requesting an exemption from the flow proportioned composite sampling requirement:
1. The wastewater discharge flow rate is consistent - facility must provide discharge information to substantiate claim.
 2. The wastewater is discharged on a batch basis and is homogenously mixed prior to discharge - facility must thoroughly explain batch discharge and mixing process.
 3. The wastewater flow rate although variable throughout a day, contains a consistent pollutant concentration - information must be submitted to substantiate claim.

4. Other conditions that generate a time proportioned composite sample representative of your facility's discharge.

B) A written action plan for implementing flow proportioned composite sampling. This requires the installation of a flow-metering device at the established compliance point. The flow meter must be equipped with an analog output for connecting a 4 – 20mA sampler interface module.

1. Type of flow classification – open or closed channel: Open channel is defined as a channel where liquid flows with a free surface. Closed channel is defined as completely filled pressure conduit.
2. Description of proposed flow measurement technology: description shall include the type of flow measurement device that is or will be installed, i.e. magnetic flow meter, venture flow meter, parshall flume, etc.
3. Specification of the measuring range and accuracy of flow measurement technology.
4. Manufacture's suggested calibration frequency. Please be advised that all facilities implementing flow proportioned composite sampling will be required to have their flow measurement device calibrated per manufactures specifications.
5. Sampling Requirement - the transmitter for the flow measurement device must include 6-pin military connector that reaches an appropriate distance for locating an automatic sampler. Indicate which of the following signal specifications your transmitter will utilize (please be advised that not all flow meters meet these specifications):

- a) Analog Signal: 4-20 mA. Facility must provide YCUA with a sampler interface module that converts analog signal to pulse.
- b) Pulse Signal: requires a 25 millisecond or greater isolated contact closure with 5-15 VDC pulse.

C) Current YCUA significant industrial users with approved flow proportional composite sampling plans shall provide the following information:

1. Type of flow classification (open or closed channel) - Open channel is defined as a channel where liquid flows with a free surface. Closed channel is defined as completely filled pressure conduit:

2. Type of flow measurement technology installed (magnetic flow meter, venture flow meter, parshall flume, etc.):

3. Specification of the measuring range and accuracy of flow measurement technology:

4. Manufacture's suggested calibration frequency: _____

5. Date of last calibration: _____

6. Calibration was performed by: _____

7. Flow meter output (volume per pulse): _____

- ◆ COMPLETE THIS SECTION FOR EACH TYPE OF WASTE NOT DISCHARGED TO THE SANITARY OR STORM SEWERS. USE A SEPARATE FORM FOR EACH TYPE OF WASTE (e.g. Spent Silver Bearing Solutions, Mercury Wastes, Solvents, Medical Wastes, etc.).
- ◆ Do not include wastes sent to sanitary landfill such as trash and garbage.

I. NON-DISCHARGED WASTE STREAM(s)

Identify the waste (e.g. spent chemical, treatment sludge, medical waste, etc.) and the process that generates the waste. Dense Non-Aqueous Phase Liquid (DNAPL) collection and storage.

This DNAPL is manually removed from recovery wells on-site.

Groundwater and soil generated during the environmental investigation completed at the site.

Physical state of the waste (liquid, sludge, slurry, etc.): Liquid, solid, groundwater

Brief characterization of waste (list hazardous ingredients and attach supporting MSDS or lab analysis):

40% Trichloroethene and 1.5% Polychlorinated Biphenyls

Soil cuttings, PVC liners, purged water

Rate of waste generation in terms of quantity per day, week, month, or quarter: 55-gal per quarter (DNAPL)
Soil cuttings and gw - not ongoing

ON-SITE STORAGE

Method of Storage: 55-gallon drum, 20-yard roll-off box, and totes

Typical Volume Stored: 55-gallon

Typical Length of Time in Storage: _____

Is Storage Site Secondarily Contained?

☒ Yes

☐ No

Are there provisions for Surface Drainage Collection?

☐ Yes

☒ No

(If you answered "yes" to either question above, please describe provisions for secondary containment and/or surface drainage collection.) _____

Secondary containment is provided by a drum overpack and a fully enclosed fire-rated storage locker. Surface drainage collection is not necessary since the storage unit is fully enclosed. Groundwater is stored in totes/drums within secondary containment area in building. Roll-off box is secured with a trap.

TRANSPORTATION

Name of Waste Hauler: US Industrial Technologies EPA No. MIK757944491

Address: 13075 Newburgh Rd. Livonia Michigan 48150 (734)462-4100
Street City State Zip Phone

DISPOSAL

Name of Waste Hauler: Veolia Environmental Services, LLC EPA No. TXD000838896

Address: Highway 73, 3.5 miles W of Port Arthur Texas 77643 (409)736-2821
Taylor's Bayou Bridge
Street City State Zip Phone

Method of Disposal (e.g. recycled, land disposal, incineration, etc.): Incineration

J. SLUG DISCHARGE MANAGEMENT PLAN

Note: Per discussions with YCUA, a slug discharge management plan is not required as part of this permit application.

All permittees are required to develop and submit a current Slug Discharge Management Plan to the YCUA. The Slug Discharge Management Plan may part of an integrated plan provided it contains all the minimum requirements of 40 CFR 403.8(f)(2)(v) A-D. The submitted plan must include the YCUA and the Michigan Department of Environmental Quality's (MDEQ) Pollution Emergency Alerting System (PEAS) in the notification process.

The Slug Discharge Management Plan can be developed in either of two ways:

1. Develop a Slug Discharge Management Plan Control Plan that contains at minimum all the requirements of 40 CFR 403.8 (f) (2) (v) A-D
2. Develop an integrated plan that includes at minimum all the requirements of a Slug Discharge Management Plan set forth in 40 CFR 403.8 (f) (2) (v) A-D.

The YCUA additionally requires that the submitted plan be reviewed and re-submitted every two years. Significant industrial users must notify the YCUA immediately if any changes occur at your facility that affect the Slug Discharge Management Plan or spill/slug potential.

If your facility does not have a Slug Discharge Management Plan or an integrated plan meeting the minimum requirements of 40 CFR 403.8 (f) (2) (v) A-D, one will be required to be submitted to the YCUA within 90 days of receiving an industrial user permit. The YCUA requires completion of the following section for applicants not submitting a plan meeting the requirements described above:

Describe your facility's procedures for assuring that concentrated or prohibited chemicals do not spill or leak into the wastewater. (e.g. segregation controls, hard plumbing, etc.) Provide extra sheets if necessary.

Do you maintain a spill log? Yes: _____ No: _____

Please be advised notification of the POTW in the event of a spill, bypass or an upset is required by law. Your facility shall contact YCUA at 734-484-4600 in the event of a spill, bypass, or upset.

Describe your facility's Employee Training Program for Chemical Handling:

Describe your facility's Emergency Response Procedures in the event of a spill: _____

Describe your facility's disposal procedures for miscellaneous floor water: _____

K. QUANTITIES OF CHEMICALS STORED & USED

Complete the following section for all chemicals stored and used in the facility. Indicate chemical usage in pounds or gallons per month. If an alternate inventory is maintained it can be submitted as a supplement to this section.

***Note - no chemicals greater than 1-L stored on-site. Hexane and acetone are occasionally used on-site in 1-L quantities.**

Stored	Used	Acids	Stored	Used	Solvents
☐	☐	Hydrochloric (Muriatic)	☒	☒	Acetone
☐	☐	Hydrofluoric	☐	☐	Alcohols
☐	☐	Nitric	☐	☐	Chlorinated Hydrocarbons
☐	☐	Sulfuric	☐	☐	Ketones
☐	☐	Other (specify) _____	☐	☐	Petroleum Solvents
☐	☐	_____	☐	☐	Toluene
☐	☐	_____	☐	☐	Xylene
☐	☐	Alkalis	☐	☐	Other (specify) _____
☐	☐	Ammonia	☐	☐	Organic Compounds
☐	☐	Calcium Hydroxide (Lime)	☐	☐	Aldehydes
☐	☐	Sodium Hydroxide	☐	☐	Algaecides
☐	☐	(Caustic Soda)	☐	☐	Formaldehydes
☐	☐	Magnesium Hydroxide	☐	☐	Herbicides
☐	☐	Other (specify) _____	☐	☐	Pesticides
☐	☐	_____	☐	☐	Phenols
☐	☐	Metals & Compounds	☐	☐	Surfactants
☐	☐	Antimony	☐	☐	Other (specify) _____
☐	☐	Barium	☐	☐	_____
☐	☐	Beryllium	☐	☐	Misc. Chemicals
☐	☐	Cadmium	☐	☐	Boron
☐	☐	Chromium	☐	☐	Chlorine
☐	☐	Copper	☐	☐	Cyanides
☐	☐	Lead	☐	☐	Dyes
☐	☐	Manganese	☐	☐	Fluorides
☐	☐	Mercury	☐	☐	Peroxides
☐	☐	Nickel	☐	☐	Sulfides
☐	☐	Selenium	☐	☐	Other (specify) _____
☐	☐	Silver	☐	☐	Hexane
☐	☐	Zinc	☒	☒	_____
☐	☐	Other (specify) _____	☐	☐	_____
☐	☐	_____	☐	☐	_____

TRADE CHEMICALS

List other chemicals stored or used, including over-the-counter chemicals (e.g. Jasco paint stripper, pesticides, motor oil, etc.) in pounds or gallons per month for which chemical compositions are unknown or proprietary. Include an MSDS for each item listed where possible. Please indicate units of measure.

Stored	Used	Trade Name	Distributor (Name & Address)
☐	☐	_____	_____
☐	☐	_____	_____
☐	☐	_____	_____
☐	☐	_____	_____
☐	☐	_____	_____
☐	☐	_____	_____
☐	☐	_____	_____
☐	☐	_____	_____

L. TOXIC SUBSTANCES/POLLUTANTS (EPA Priority Pollutants)

From the following list of compounds, check all those, which are either used in your facility, generated in your facility, or are stored on the premises.

Priority Pollutant – Volatile Compounds

- | | | |
|--|---|---|
| ☐ Acrolein | ☐ Chloroform | ☐ Ethylbenzene |
| ☐ Acrylonitrile | ☐ Chloromethane | ☐ Methylene chloride |
| ☐ Benzene | ☐ Dibromochloromethane | ☐ 1,1,2,2-Tetrachloroethane |
| ☐ Bromodichloromethane | ☐ 1,1-Dichloroethane | ☐ 1,1,2,2-Tetrachloroethene |
| ☐ Bromoform | ☐ 1,2-Dichloroethane | ☐ Toluene |
| ☐ Bromomethane | ☐ 1,1-Dichloroethene | ☐ 1,1,1-Trichloroethane |
| ☐ Carbon tetrachloride | ☐ trans-1,2-Dichloroethylene | ☒ Trichloroethene |
| ☐ Chlorobenzene | ☐ 1,2-dichloropropane | ☐ Trichlorofluoromethane |
| ☐ Chloroethane | ☐ 1,3-Dichloropropene | ☒ Vinyl chloride |
| ☐ 2-Chloroethyl vinyl ether | | |

Priority Pollutant - Extractable Compounds

Acid Extractable

- ☐ p-Chloro-m-cresol
- ☐ 2-Chlorophenol
- ☐ 2,4-Dichlorophenol
- ☐ 2,4-Dimethylphenol
- ☐ 4,6-Dinitro-o-cresol
- ☐ 2,4-Dinitrophenol
- ☐ 2-Nitrophenol
- ☐ 4-Nitrophenol
- ☐ Pentachlorophenol
- ☐ Phenol
- ☐ 2,4,6-Trichlorophenol

Base / Neutral Extractable

- ☐ Acenaphthene
- ☐ Acenaphthylene
- ☐ Anthracene
- ☐ Benzidine
- ☐ Benzo(a)anthracene
- ☐ Benzo(e)fluoranthene
- ☐ Benzo(k)fluoranthene
- ☐ Benzo(ghi)perylene
- ☐ Benzo(a)pyrene
- ☐ Bis(2-chloroethoxy)methane
- ☐ Bis(2-chloroethyl)ether
- ☐ Bis(2-chloroisopropyl)ether
- ☐ Bis(2-ethylhexyl)phthalate
- ☐ 4-Bromophenyl phenyl ether
- ☐ Butyl benzyl phthalate

Priority Pollutant - Extractable Compounds

Base / Neutral Extractable Cont.

- | | |
|--|--|
| ☐ 2-Chloronaphthalene | ☐ Hexachlorobenzene |
| ☐ 4-Chlorophenyl phenyl ether | ☐ Hexachlorobutadiene |
| ☐ Chrysene | ☐ Hexachlorocyclopentadiene |
| ☐ Dibenzo(a,h) anthracene | ☐ Hexachloroethane |
| ☐ Di-n-butyl phthalate | ☐ Indeno(1,2,3-c,d) pyrene |
| ☐ 1,2-Dichlorobenzene | ☐ Isophorone |
| ☐ 1,3-Dichlorobenzene | ☐ Naphthalene |
| ☐ 1,4 Dichlorobenzene | ☐ Nitrobenzene |
| ☐ 3,3'-Dichlorobenzidine | ☐ N-Nitrosodimethylamine |
| ☐ Diethylphthalate | ☐ N-Nitrosodiphenylamine |
| ☐ Dimethyl phthalate | ☐ N-Nitroso-din-propylamine |
| ☐ 2,4-Dinitrotoluene | ☐ Phenathrene |
| ☐ 2,6-Dinitrotoluene | ☐ Pyrene |
| ☐ Di-n-octyl phthalate | ☐ 1,2,4-Trichlorobenzene |
| ☐ Fluoranthene | ☐ 2,3,7,8- Tetrachlorodibenzo p-dioxin (2,3,7,8-TCDD) |
| ☐ Fluorene | |

Priority Pollutant / TTO Pesticides and PCB's

- | | | |
|---|--|---|
| ☐ 4,4'-DDD | ☐ Chlordane | ☐ Toxaphene |
| ☐ 4,4'-DDE | ☐ BHC-delta | ☐ Arochlor 1016 |
| ☐ 4,4'-DDT | ☐ Dieldrin | ☐ Arochlor 1221 |
| ☐ Aldrin | ☐ Endrin | ☐ Arochlor 1232 |
| ☐ BHC-alpha | ☐ Endrin aldehyde | ☒ Arochlor 1242 |
| ☐ Endosulfan-alpha | ☐ Fluoranthene | ☒ Arochlor 1248 |
| ☐ BHC-beta | ☐ BHC-gamma (Lindane) | ☒ Arochlor 1254 |
| ☐ Endosulfan-beta | ☐ Heptachlor | ☒ Arochlor 1260 |
| | ☐ Heptachlor Epoxide | |

Indicate the location and use of any compounds that are checked:

Trichloroethene and Vinyl Chloride are contaminants present in the groundwater that will be treated prior to discharge to YCUA. Trichloroethene is also present in the DNAPL collected on-site as well as the PCB's indicated above.

Chemical Name	Chemical Structure	Chemical Name	Chemical Structure
1,2-Dichloroethane	<chem>ClCCl</chem>	1,2-Dichloroethane	<chem>ClCCl</chem>
1,1-Dichloroethane	<chem>CCl(C)Cl</chem>	1,1-Dichloroethane	<chem>CCl(C)Cl</chem>
1,1,2-Trichloroethane	<chem>CCl(C)CCl</chem>	1,1,2-Trichloroethane	<chem>CCl(C)CCl</chem>
1,1,1-Trichloroethane	<chem>CCl(C)(C)Cl</chem>	1,1,1-Trichloroethane	<chem>CCl(C)(C)Cl</chem>
1,1,2,2-Tetrachloroethane	<chem>ClC(Cl)Cl</chem>	1,1,2,2-Tetrachloroethane	<chem>ClC(Cl)Cl</chem>
1,1,1,2-Tetrachloroethane	<chem>CCl(C)(Cl)Cl</chem>	1,1,1,2-Tetrachloroethane	<chem>CCl(C)(Cl)Cl</chem>
1,1,1,1-Tetrachloroethane	<chem>CCl(C)(C)(C)Cl</chem>	1,1,1,1-Tetrachloroethane	<chem>CCl(C)(C)(C)Cl</chem>
1,1,1,2,2-Pentachloroethane	<chem>CCl(C)(Cl)(Cl)Cl</chem>	1,1,1,2,2-Pentachloroethane	<chem>CCl(C)(Cl)(Cl)Cl</chem>
1,1,1,2,2,2-Hexachloroethane	<chem>CCl(C)(Cl)(Cl)(Cl)Cl</chem>	1,1,1,2,2,2-Hexachloroethane	<chem>CCl(C)(Cl)(Cl)(Cl)Cl</chem>
1,1,1,1,2-Pentachloroethane	<chem>CCl(C)(C)(Cl)(Cl)Cl</chem>	1,1,1,1,2-Pentachloroethane	<chem>CCl(C)(C)(Cl)(Cl)Cl</chem>
1,1,1,1,2,2-Hexachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)Cl</chem>	1,1,1,1,2,2-Hexachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)Cl</chem>
1,1,1,1,2,2,2-Heptachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)Cl</chem>	1,1,1,1,2,2,2-Heptachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)Cl</chem>
1,1,1,1,2,2,2,2-Octachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)(Cl)Cl</chem>	1,1,1,1,2,2,2,2-Octachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)(Cl)Cl</chem>
1,1,1,1,2,2,2,2,2-Nonachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)(Cl)(Cl)Cl</chem>	1,1,1,1,2,2,2,2,2-Nonachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)(Cl)(Cl)Cl</chem>
1,1,1,1,2,2,2,2,2,2-Decachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)(Cl)(Cl)(Cl)Cl</chem>	1,1,1,1,2,2,2,2,2,2-Decachloroethane	<chem>CCl(C)(C)(Cl)(Cl)(Cl)(Cl)(Cl)(Cl)(Cl)Cl</chem>

M. CERTIFICATION STATEMENT

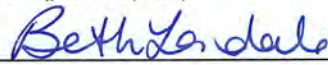
Municipal Code requires that permit applications, and any other reports required by the Director shall be **signed by an Executive Officer of the business filing the application**. Such Executive Officer shall be at least of the level of Vice President, General Partner, President, or an individual responsible for the overall operation of the facility applying for the Permit, or meet the Federal requirements for NPDES applications as contained in Title 40 of the Code of Federal Regulations.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations."

CERTIFIED BY:

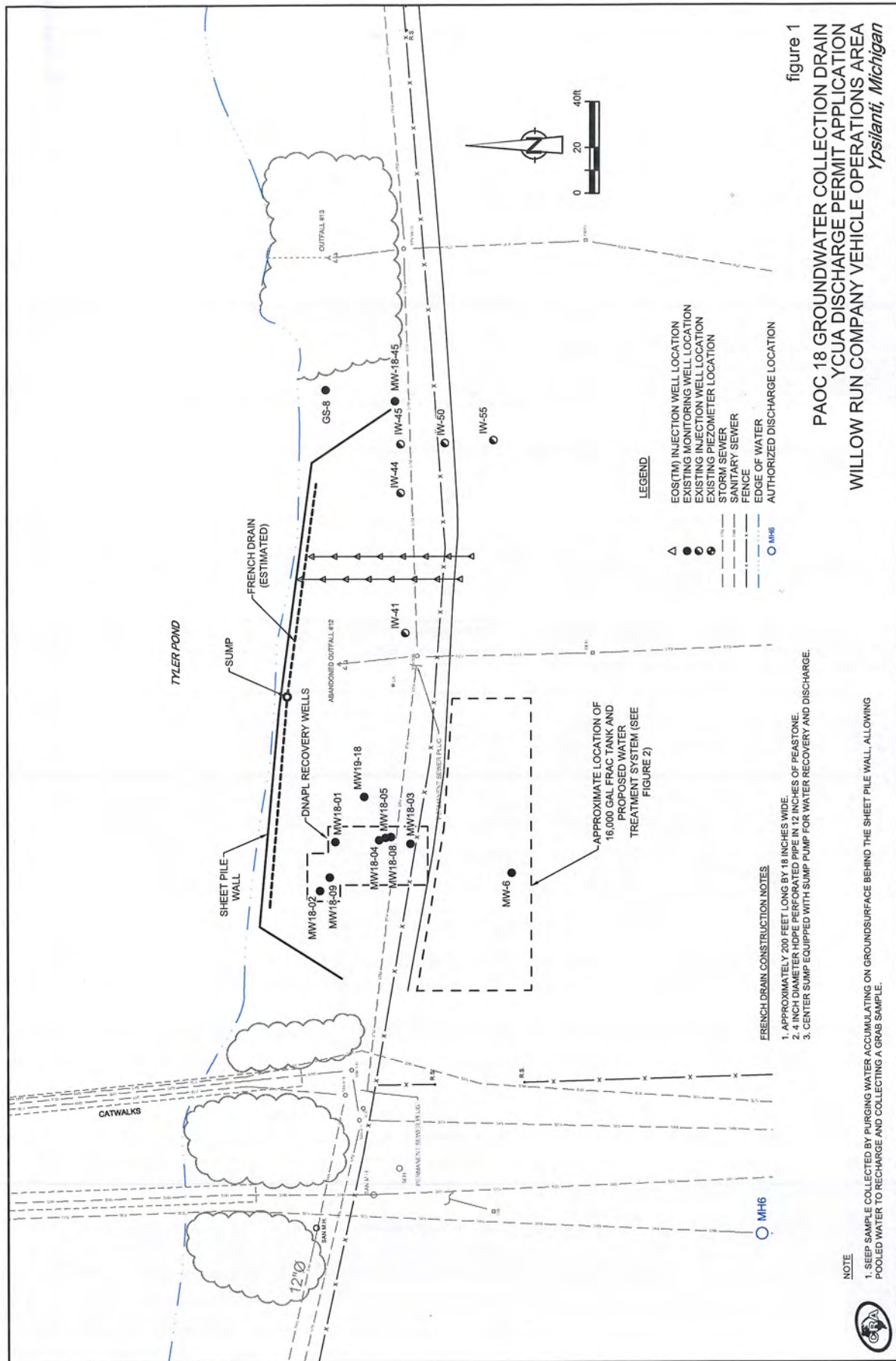
Grant Trigger	gtrigger@racertrust.org	Clean-up Manager
Name (please print)	Email	Title
	3-28-12	313-670-6226
Signature	Date	Phone

PREPARED BY:

Beth Landale, PE	blandale@croworld.com	Project Manager
Name (please print)	Email	Title
	3-28-12	734-453-5123
Signature	Date	Phone

ATTACHMENT B

FIGURES



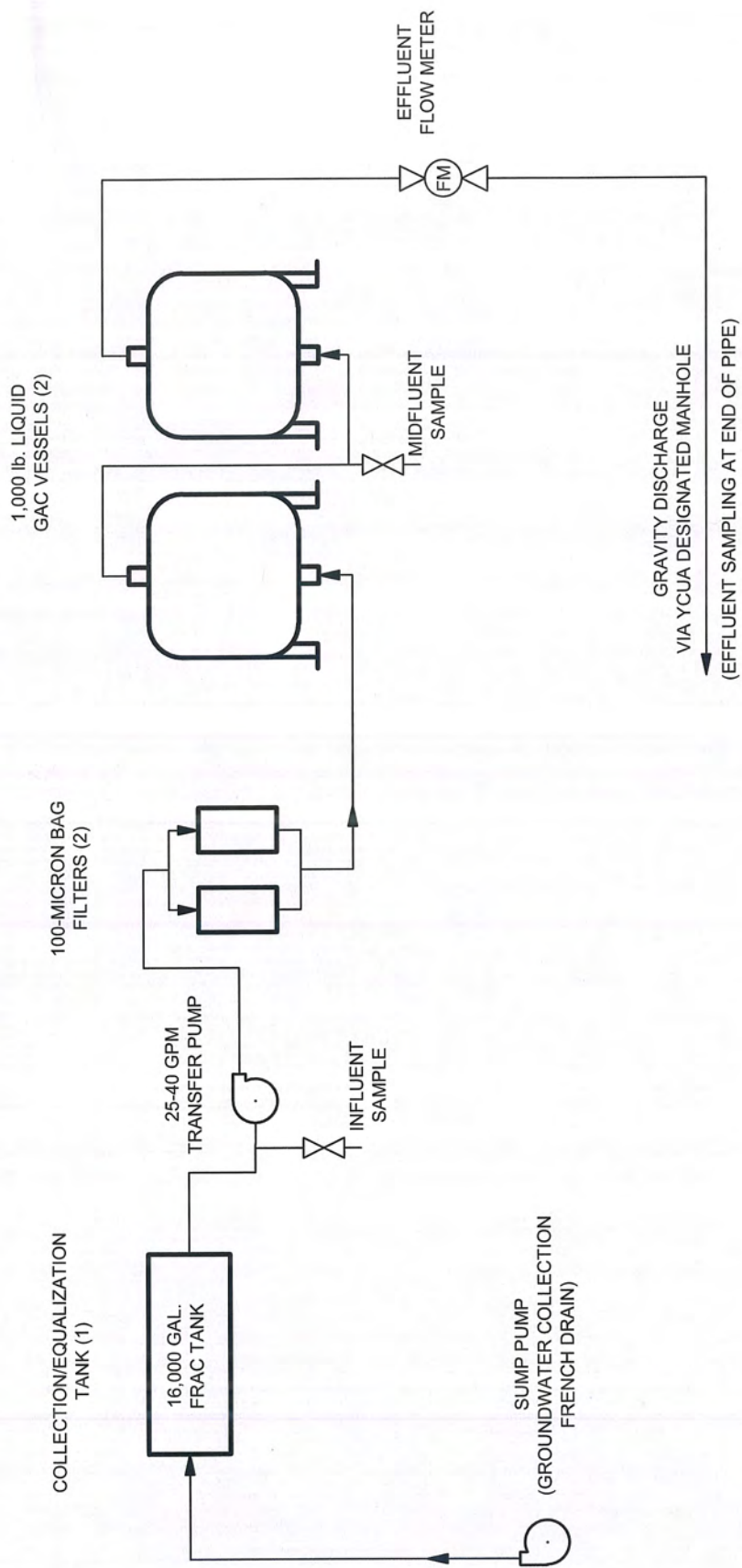


figure 2
 SCHEMATIC FLOW DIAGRAM
 GROUNDWATER TREATMENT SYSTEM
 YCUA DISCHARGE PERMIT APPLICATION
 WILLOW RUN COMPANY VEHICLE OPERATIONS AREA
 Ypsilanti, Michigan



ATTACHMENT C

- C.1 INFLUENT ANALYTICAL DATA
- C.2 MIDDLEUENT ANALYTICAL DATA
- C.3 EFFLUENT ANALYTICAL DATA
- C.4 GROUNDWATER TREATMENT LOGS
- C.5 INDUSTRIAL USER PERMIT # RA 6-12

ANALYTICAL DATA -INFLUENT
WILLOW RUN COMPANY VEHICLE OPERATIONS AREA
YPSILANTI, MICHIGAN

Sample Location:	Influent	Influent	Influent	Influent	Influent	Influent	Influent
Sample ID:	WW-17303-060611-CB-001	WW-17303-062011-CB-003	WW-17303-071311-MA-003	WW-17303-080811-AB-003	WW-17303-091911-CB-001	WW-17303-101711-CB-001	WW-17303-111611-CB-001
Sample Date:	06/06/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:							
Parameters	Units						
VOCs							
1,1,1-Trichloroethane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,1,2-Trichloroethane	ug/L	30	1000 U	420 U	330 U	200 U	330 U
1,1-Dichloroethane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,1-Dichloroethene	ug/L	20	1000 U	420 U	330 U	200 U	330 U
1,2,4-Trichlorobenzene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,2-Dibromoethane (Ethylene dibromide)	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,2-Dichlorobenzene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,2-Dichloroethane	ug/L	12	1000 U	420 U	330 U	200 U	330 U
1,2-Dichloropropane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,3-Dichlorobenzene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
1,4-Dichlorobenzene	ug/L	1.0	1000 U	420 U	330 U	200 U	330 U
2-Butanone (Methyl ethyl ketone) (MEK)	ug/L	10 U	10000 U	4200 U	3300 U	2000 U	3300 U
2-Hexanone	ug/L	5.0 U	10000 U	4200 U	3300 U	2000 U	3300 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	ug/L	5.0 U	10000 U	4200 U	3300 U	2000 U	3300 U
Acetone	ug/L	10 U	10000 U	4200 U	3300 U	2000 U	3300 U
Benzene	ug/L	28	1000 U	420 U	330 U	200 U	330 U
Bromodichloromethane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Bromoform	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Bromomethane (Methyl bromide)	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Carbon disulfide	ug/L	1.0 U	5000 U	2100 U	1700 U	1000 U	1700 U
Carbon tetrachloride	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Chlorobenzene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Chloroethane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Chloroform (Trichloromethane)	ug/L	1.1	1000 U	420 U	330 U	200 U	330 U
Chloromethane (Methyl chloride)	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
cis-1,2-Dichloroethene	ug/L	22000	29000	12000	7200	5600	7600
cis-1,3-Dichloropropene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Cyclohexane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Dibromochloromethane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Ethylbenzene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Isopropyl benzene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Methyl acetate	ug/L	1.0 U	10000 U	4200 U	3300 U	2000 U	3300 U
Methyl cyclohexane	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Methyl tert butyl ether (MTBE)	ug/L	1.0 U	5000 U	2100 U	1700 U	1000 U	1700 U
Methylene chloride	ug/L	1.0 U	5000 U	2100 U	1700 U	1000 U	1700 U
Styrene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Tetrachloroethene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Toluene	ug/L	1.2	1000 U	420 U	330 U	200 U	330 U
trans-1,2-Dichloroethene	ug/L	130 E	1000 U	420 U	330 U	200 U	330 U
trans-1,3-Dichloropropene	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Trichloroethene	ug/L	310 J	1000 U	420 U	330 U	200 U	330 U
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U	1000 U	420 U	330 U	200 U	330 U
Vinyl chloride	ug/L	2600	7800	5800	2600	2500	3100
Xylenes (total)	ug/L	2.0 U	2000 U	830 U	670 U	400 U	670 U

ATTACHMENT C.1
ANALYTICAL DATA -INFLUENT
WILLOW RUN COMPANY VEHICLE OPERATIONS AREA
YPSILANTI, MICHIGAN

Sample Location:	Influent	Influent	Influent	Influent	Influent	Influent	Influent
Sample ID:	WW-17303-060611-CB-001	WW-17303-062011-CB-003	WW-17303-071311-MA-003	WW-17303-080811-AB-003	WW-17303-091911-CB-001	WW-17303-101711-CB-001	WW-17303-111611-CB-001
Sample Date:	06/06/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:							
Parameters	Units						
PCBs							
Aroclor-1016 (PCB-1016)	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U
Aroclor-1221 (PCB-1221)	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U
Aroclor-1232 (PCB-1232)	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U
Aroclor-1242 (PCB-1242)	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U
Aroclor-1248 (PCB-1248)	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U
Aroclor-1254 (PCB-1254)	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U
Aroclor-1260 (PCB-1260)	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U
Total PCBs	ug/L	0.10 U	0.099 U	0.099 U	0.097 U	0.095 U	0.10 U

Notes:
U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
J - The associated value is qualified as an estimated quantity.

ANALYTICAL DATA - MID POINT
WILLOW RUN COMPANY VEHICLE OPERATIONS
YPSILANTI, MICHIGAN

Sample Location:		Mid Point	Mid Point	Mid Point	Mid Point	Mid Point	Mid Point	Mid Point
Sample ID:		WW-17303-060611-CB-002	WW-17303-062011-CB-004	WW-17303-071311-MA-002	WW-17303-080811-AB-002	WW-17303-091911-CB-002	WW-17303-101711-CB-002	WW-17303-111611-CB-002
Sample Date:		06/06/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:								
Parameters	Units							
VOCs								
1,1,1-Trichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,1,2-Trichloroethane	ug/L	21	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,1-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,1-Dichloroethene	ug/L	14	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,2,4-Trichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,2-Dibromoethane (Ethylene dibromide)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,2-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,2-Dichloroethane	ug/L	8.2	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,2-Dichloropropane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,3-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
1,4-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
2-Butanone (Methyl ethyl ketone) (MEK)	ug/L	10 U	10 U	10 U	0.86 J	10 U	25 U	50 U
2-Hexanone	ug/L	5.0 U	10 U	10 U	10 U	10 U	25 U	50 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	ug/L	5.0 U	10 U	10 U	10 U	10 U	25 U	50 U
Acetone	ug/L	10 U	10 U	1.9 J	3.0 J	10 U	25 U	50 U
Benzene	ug/L	18	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Bromodichloromethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Bromoform	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Bromomethane (Methyl bromide)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Carbon disulfide	ug/L	1.0 U	5.0 U	5.0 U	5.0 U	5.0 U	13 U	25 U
Carbon tetrachloride	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Chlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Chloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Chloroform (Trichloromethane)	ug/L	0.71 J	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Chloromethane (Methyl chloride)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
cis-1,2-Dichloroethene	ug/L	17000	1.0 U	1.0 U	1.0 U	0.27 J	0.97 J	13
cis-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Dibromochloromethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Ethylbenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Isopropyl benzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Methyl acetate	ug/L	1.0 U	10 U	10 U	10 U	10 U	25 U	50 U
Methyl cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Methyl tert butyl ether (MTBE)	ug/L	1.0 U	5.0 U	5.0 U	5.0 U	5.0 U	13 U	25 U
Methylene chloride	ug/L	1.0 U	5.0 U	5.0 U	5.0 U	5.0 U	13 U	4.2 JB
Styrene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Tetrachloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Toluene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
trans-1,2-Dichloroethene	ug/L	110 E	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
trans-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Trichloroethene	ug/L	330	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	2.5 U	5.0 U
Vinyl chloride	ug/L	1100	1.8	1.1	6.7	28	57	190
Xylenes (total)	ug/L	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U	5.0 U	10 U

ATTACHMENT C.2
ANALYTICAL DATA - MID POINT
WILLOW RUN COMPANY VEHICLE OPERATIONS
YPSILANTI, MICHIGAN

Sample Location:	Mid Point	Mid Point	Mid Point	Mid Point	Mid Point	Mid Point	Mid Point
Sample ID:	WW-17303-060611-CB-002	WW-17303-062011-CB-004	WW-17303-071311-MA-002	WW-17303-080811-AB-002	WW-17303-091911-CB-002	WW-17303-101711-CB-002	WW-17303-111611-CB-002
Sample Date:	06/06/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:							
Parameters	Units						
PCBs							
Aroclor-1016 (PCB-1016)	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U
Aroclor-1221 (PCB-1221)	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U
Aroclor-1232 (PCB-1232)	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U
Aroclor-1242 (PCB-1242)	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U
Aroclor-1248 (PCB-1248)	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U
Aroclor-1254 (PCB-1254)	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U
Aroclor-1260 (PCB-1260)	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U
Total PCBs	ug/L	0.095 U	0.097 U	0.10 U	0.10 U	0.097 U	0.10 U

Notes:
U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.
J - The associated value is qualified as an estimated quantity.

ANALYTICAL DATA - EFFLUENT
WILLOW RUN COMPANY VEHICLE OPERATIONS
YPSILANTI, MICHIGAN

Sample Location:	MH-6 ¹	MH-6	MH-6	MH-6	MH-6	MH-6	MH-6	MH-6
Sample ID:	WW-17303-060611-CB-003	WW-17303-062011-CB-001	WW-17303-062011-CB-002	WW-17303-071311-MA-001	WW-17303-080811-AB-001	WW-17303-091911-CB-003	WW-17303-101711-CB-003	WW-17303-111611-CB-003
Sample Date:	06/06/2011	06/20/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:			Duplicate					
Parameters	Units							
VOCs								
1,1,1-Trichloroethane	ug/L	1.0 U	--	--	--	--	--	--
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	--	--	--	--	--	--
1,1,2-Trichloroethane	ug/L	1.0 U	--	--	--	--	--	--
1,1-Dichloroethane	ug/L	1.0 U	--	--	--	--	--	--
1,1-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	--	--	1.0 U	--
1,2,4-Trichlorobenzene	ug/L	1.0 U	--	--	--	--	--	--
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	1.0 U	--	--	--	--	--	--
1,2-Dibromoethane (Ethylene dibromide)	ug/L	1.0 U	--	--	--	--	--	--
1,2-Dichlorobenzene	ug/L	1.0 U	--	--	--	--	--	--
1,2-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	ug/L	1.0 U	--	--	--	--	--	--
1,3-Dichlorobenzene	ug/L	1.0 U	--	--	--	--	--	--
1,4-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	--	--	1.0 U	--
2-Butanone (Methyl ethyl ketone) (MEK)	ug/L	8.9 J	0.51 J	1.0 U	--	--	1.0 U	--
2-Hexanone	ug/L	5.0 U	--	--	--	--	--	--
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	ug/L	5.0 U	--	--	--	--	--	--
Acetone	ug/L	8.6 J	--	--	--	--	--	--
Benzene	ug/L	1.0 U	1.0 U	1.0 U	--	--	1.0 U	--
Bromodichloromethane	ug/L	1.0 U	--	--	--	--	--	--
Bromoform	ug/L	1.0 U	--	--	--	--	--	--
Bromomethane (Methyl bromide)	ug/L	1.0 U	--	--	--	--	--	--
Carbon disulfide	ug/L	1.0 U	--	--	--	--	--	--
Carbon tetrachloride	ug/L	1.0 U	1.0 U	1.0 U	--	--	1.0 U	--
Chlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	--	--	1.0 U	--
Chloroethane	ug/L	1.0 U	--	--	--	--	--	--
Chloroform (Trichloromethane)	ug/L	1.0 U	1.0 U	1.0 U	--	--	1.0 U	--
Chloromethane (Methyl chloride)	ug/L	1.0 U	--	--	--	--	--	--
cis-1,2-Dichloroethene	ug/L	1.0 U	--	--	--	--	--	--
cis-1,3-Dichloropropene	ug/L	1.0 U	--	--	--	--	--	--
Cyclohexane	ug/L	1.0 U	--	--	--	--	--	--
Dibromochloromethane	ug/L	1.0 U	--	--	--	--	--	--
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	--	--	--	--	--	--
Ethylbenzene	ug/L	1.0 U	--	--	--	--	--	--
Isopropyl benzene	ug/L	1.0 U	--	--	--	--	--	--
m&p-Xylenes	ug/L	--	--	--	--	--	--	--
Methyl acetate	ug/L	1.0 U	--	--	--	--	--	--
Methyl cyclohexane	ug/L	1.0 U	--	--	--	--	--	--
Methyl tert butyl ether (MTBE)	ug/L	1.0 U	--	--	--	--	--	--
Methylene chloride	ug/L	1.0 U	--	--	--	--	--	--
o-Xylene	ug/L	--	--	--	--	--	--	--
Styrene	ug/L	1.0 U	--	--	--	--	--	--
Tetrachloroethene	ug/L	1.0 U	1.0 U	1.0 U	--	--	1.0 U	--
Toluene	ug/L	1.0 U	--	--	--	--	--	--
trans-1,2-Dichloroethene	ug/L	1.0 U	--	--	--	--	--	--
trans-1,3-Dichloropropene	ug/L	1.0 U	--	--	--	--	--	--
Trichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	--	--	--	--	--	--
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U	--	--	--	--	--	--
Vinyl chloride	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Xylenes (total)	ug/L	2.0 U	--	--	--	--	--	--

ATTACHMENT C.3

ANALYTICAL DATA - EFFLUENT
WILLOW RUN COMPANY VEHICLE OPERATIONS
YPSILANTI, MICHIGAN

Sample Location:		MH-6 ¹	MH-6	MH-6	MH-6	MH-6	MH-6	MH-6	MH-6
Sample ID:		WW-17303-060611-CB-003	WW-17303-062011-CB-001	WW-17303-062011-CB-002	WW-17303-071311-MA-001	WW-17303-080811-AB-001	WW-17303-091911-CB-003	WW-17303-101711-CB-003	WW-17303-111611-CB-003
Sample Date:		06/06/2011	06/20/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:				Duplicate					
Parameters	Units								
PCBs									
Aroclor-1016 (PCB-1016)	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
Aroclor-1221 (PCB-1221)	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
Aroclor-1232 (PCB-1232)	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
Aroclor-1242 (PCB-1242)	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
Aroclor-1248 (PCB-1248)	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
Aroclor-1254 (PCB-1254)	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
Aroclor-1260 (PCB-1260)	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
Total PCBs	ug/L	0.10 U	0.096 U	0.095 U	0.096 U	0.097 U	0.096 U	0.097 U	0.095 U
General Chemistry									
Chemical oxygen demand (COD)	mg/L	--	13 J	20	--	--	--	13 J	--
pH, lab	s.u.	--	7.17	7.17	--	--	--	7.43	--
Phenolics (total)	mg/L	--	0.17 B	0.014 J B	--	--	--	0.11	--

Notes:

¹ The groundwater was treated on 06/06/2011, however, the first discharge occurred on June 20, 2011.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

J - The associated value is qualified as an estimated quantity.

ANALYTICAL DATA - EFFLUENT
WILLOW RUN COMPANY VEHICLE OPERATIONS
YPSILANTI, MICHIGAN

Sample Location:		Trip Blank	Trip Blank	Trip Blank	Trip Blank	Trip Blank	Trip Blank	Trip Blank
Sample ID:		TB-17303-060611-CB-004	TB-17303-062011-CB-005	WW-17303-071311-BL-004	WW-17303-080811-AB-004	TB-17303-091911-CB-004	TB-17303-101711-CB-004	TB-17303-111611-CB-004
Sample Date:		06/06/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:								
Parameters	Units							
VOCs								
1,1,1-Trichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromoethane (Ethylene dibromide)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Butanone (Methyl ethyl ketone) (MEK)	ug/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U
2-Hexanone	ug/L	5.0 U	10 U	10 U	10 U	10 U	10 U	10 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	ug/L	5.0 U	10 U	10 U	10 U	10 U	10 U	10 U
Acetone	ug/L	10 U	2.4 J B	1.8 J	1.6 J B	1.2 J B	10 U	10 U
Benzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromodichloromethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromoform	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl bromide)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon disulfide	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon tetrachloride	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloromethane (Methyl chloride)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.11 J	1.0 U
Dibromochloromethane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	0.10 J	1.0 U
Isopropyl benzene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
m&p-Xylenes	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl acetate	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl cyclohexane	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methylene chloride	ug/L	1.0 U	1.0 U	1.0 U	0.28 J B	1.0 U	1.0 U	1.0 U
o-Xylene	ug/L	--	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Styrene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Tetrachloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,2-Dichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Trichloroethene	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Trifluorotrichloroethane (Freon 113)	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Vinyl chloride	ug/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Xylenes (total)	ug/L	2.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U	3.0 U

ANALYTICAL DATA - EFFLUENT
WILLOW RUN COMPANY VEHICLE OPERATIONS
YPSILANTI, MICHIGAN

Sample Location:		Trip Blank	Trip Blank	Trip Blank	Trip Blank	Trip Blank	Trip Blank	Trip Blank
Sample ID:		TB-17303-060611-CB-004	TB-17303-062011-CB-005	WW-17303-071311-BL-004	WW-17303-080811-AB-004	TB-17303-091911-CB-004	TB-17303-101711-CB-004	TB-17303-111611-CB-004
Sample Date:		06/06/2011	06/20/2011	07/13/2011	08/08/2011	09/19/2011	10/17/2011	11/16/2011
Sample Type:								
Parameters	Units							
PCBs								
Aroclor-1016 (PCB-1016)	ug/L	--	--	--	--	--	--	--
Aroclor-1221 (PCB-1221)	ug/L	--	--	--	--	--	--	--
Aroclor-1232 (PCB-1232)	ug/L	--	--	--	--	--	--	--
Aroclor-1242 (PCB-1242)	ug/L	--	--	--	--	--	--	--
Aroclor-1248 (PCB-1248)	ug/L	--	--	--	--	--	--	--
Aroclor-1254 (PCB-1254)	ug/L	--	--	--	--	--	--	--
Aroclor-1260 (PCB-1260)	ug/L	--	--	--	--	--	--	--
Total PCBs	ug/L	--	--	--	--	--	--	--
General Chemistry								
Chemical oxygen demand (COD)	mg/L	--	--	--	--	--	--	--
pH, lab	s.u.	--	--	--	--	--	--	--
Phenolics (total)	mg/L	--	--	--	--	--	--	--
Notes:								
¹ Water was treated on 06/06/2011, however, the first discharge occurred on June 20, 2011.								
U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.								
J - The associated value is qualified as an estimated quantity.								

C.4 GROUNDWATER TREATMENT LOGS

GROUNDWATER TREATMENT LOG

RACER-CVO
Ypsilanti, Michigan

Pre-Treatment Checklist											Treatment Checklist								
Start Date	Time	End Time	Frac-1 Valve Opened	Oil Check on pump	Bag Filter Changed yes no	Pre-Bag Filter Valve open & adjusted	Post-Bag filter Valve open	Post Secondary Carbon Vessel Valve Opened	Flow Totalizer reading (Cubic Feet)	Flow Totalizer reading (gallons) (cft x 7.48)	Discharge hose in Manhole	Backfilter & Carbon units burped	Bag filter pressure BFI/ BF2	Carbon filter pressure CF1/CF2	Flow Totalizer reading (Cubic Feet)	Flow Rate cubic feet/ min	Flow Rate gpm (cft/min x 7.48) not > 40 gpm	Samples collected for treatment operation	Samples collected for Permit
6/17/11	9:33		NO	✓	yes	yes	yes	yes	00515227	38,542.2	✓	yes	10 PSI	3	0515227	4.9	36.6 bpm	Emptying TOTES	
6/17/11	10:15		NO	"	"	"	"	"	00515229	38,588.6	✓	yes	10 PSI	3	00515229	5.1	38.1 bpm	2-TOTES Empty	
6/17/11	10:15		NO	"	"	"	"	"	00516022	38,598.3	✓	yes	8 PSI	3	00516022	3.9	29.17 bpm		
6/17/11	11:31	11:31	NO	"	"	"	"	"	00518228	38,767.3	NO	NO	0	0	00518228	3.9	29 bpm	7-Totes Empty	
6/20/11	8:35		yes	"	"	"	"	"	00518228	38,767.3	yes	yes	12 PSI	3	00518228	3.3	24.7 bpm		
6/20/11	9:00		yes	"	"	"	"	"	0051916	388,332	yes	yes	12 PSI	3	0051916	5.3	39.6 bpm		
6/20/11	9:35		yes	"	"	"	"	"	0052112	389,798	yes	yes	12 PSI	3	0052112	5.3	39.6 bpm		
6/20/11	10:04		"	"	"	"	"	"	0052263	390,927	"	"	12 PSI	3	0052263	5.3	39.6 bpm		
6/20/11	11:00		"	"	"	"	"	"	0052564	393,179	"	"	6 PSI	3	0052564	5.2	38.9 bpm		
6/20/11	12:00		"	"	"	"	"	"	0052842	395,258	"	"	10 PSI	3	0052842	5.0	37.4 bpm		

GROUNDWATER TREATMENT LOG

RACER-CVO
Ypsilanti, Michigan

Pre-Treatment Checklist												Treatment Checklist							
Start Date	Time	End Time	Frac-1 Valve Opened	Oil Check on pump	Bag Filter Changed yes no	Pre-Bag Filter Valve open & adjusted	Post-Bag Filter Valve open	Post Secondary Carbon Vessel Valve Opened	Flow Totalizer reading (Cubic Feet)	Flow Totalizer reading (gallons) (cft x 7.48)	Discharge hose in Manhole	Bafilter & Carbon units burped	Bag filter pressure BFI/BF2	Carbon filter pressure CF1/CF2	Flow Totalizer reading (Cubic Feet)	Flow Rate cubic feet/min	Flow Rate gpm (cft/min x 7.48) not > 40 gpm	Samples collected for treatment operation	Samples collected for Permit
6/20/11	1:00		yes	✓	yes	yes	yes	yes	0053148	397,547	✓	yes	13 PSI	4	0053148	5.4	40.4 bpm		
6/20/11	2:03		"	"	"	"	"	"	0053507	400,232	"	"	10 PSI	4	0053507	5.5	41.1 bpm		
6/20/11	3:00		"	"	"	"	"	"	0053787	402,326	"	"	10 PSI	3	0053787	5.3	39.6 bpm		
6/20/11	3:45	3:45	closed	"	NO	closed	closed	closed	0054036	404,189	"	—	0	0	0054036	5.3	39.6 bpm	less than 653 gal in frac tank	
7/13/11	8:00		yes	"	NO	yes	yes	yes	0054030	404,144	"	yes	12 PSI	4	0054030	4.4	32.9 bpm	973 gal in frac tank	
7/13/11	9:05		"	"	"	"	"	"	0054240	405,715	"	"	7.5 PSI	0	0054240	4.8	35.1 bpm		
7/13/11	10:00		"	"	"	"	"	"	0054513	407,757	"	"	7 PSI	0	0054513	4.8	35.1 bpm	5362 gal in frac tank	
7/13/11	11:00		"	"	"	"	"	"	0054748	409,515	"	"	7 PSI	0	0054748	4.6	34.4 bpm		
7/13/11	12:00		"	"	"	"	"	"	0055040	411,699	"	"	8 PSI	0	0055040	4.9	36.7 bpm		
7/13/11	1:00	1:15	closed	"	"	closed	closed	closed	0055337	413,920	manhole closed	—	5 PSI	0	0055337	.7	5.24 bpm	< 82 gal in frac tank	

GROUNDWATER TREATMENT LOG

RACER-CVO
Ypsilanti, Michigan

Pre-Treatment Checklist												Treatment Checklist							
Start Date	Time	End Time	Frac-1 Valve Opened	Oil Check on pump	Bag Filter Changed yes/no	Pre-Bag Filter Valve open & adjusted	Post-Bag Filter Valve open	Post Secondary Carbon Vessel Valve Opened	Flow Totalizer reading (Cubic Feet)	Flow Totalizer reading (gallons) (cft x 7.48)	Discharge hose in Manhole	Boilifier & Carbon units burped	Bag filter pressure BF1/BF2	Carbon filter pressure CF1/CF2	Flow Totalizer reading (Cubic Feet)	Flow Rate cubic feet/min	Flow Rate gpm (cft/min x 7.48) not > 40 gpm	Samples collected for treatment operation	Samples collected for Permit
8/8/11	8:20		yes	yes	yes	yes	yes	yes	0055330	413,868	yes	yes	9 PSI 9 PSI	2	0055330	5.0	37.4 gpm	10744 in Frac	
8/8/11	9:28		"	"	"	"	"	"	0055589	415,806	"	"	"	"	0055589	5.0	37.4 gpm		
8/8/11	10:20		"	"	"	"	"	"	0055852	417,773	"	"	8.5 PSI 8.5 PSI	2	0055852	4.9	36.7 gpm		
8/8/11	11:20		"	"	"	"	"	"	0056159	420,069	"	"	8.5 PSI 8.5 PSI	1.5	0056159	4.7	35.2 gpm		
8/8/11	12:20		"	"	-	"	"	"	0056446	422,216	"	-	9 PSI 9 PSI	2	0056446	5.1	38.1 gpm		
8/8/11	1:05	1:05	closed	-	-	closed	closed	closed	0056664	423,885 423,846	out	-	0 PSI 0 PSI	0	0056664	0	0	1000 gal in Frac	
9/19/11	8:30		yes	yes	NO	open	open	open	0056664	428,846	IN	yes	0 PSI 7 PSI	1.5	0056664	4.3	32.06 gpm	1.72 FEET IN FRAC 13,940	
9/19/11	8:45		yes	yes	NO	open	open	open	0056330	424,310	IN	yes	9	2.0	0056330	5.4	40.6 gpm		
9/21/11	9:40		"	"	"	"	"	"	0056330 57007	424,310 426,801	"	"	9	2.0	0056330 57007	5.4			
9/21/11	10:39								0056330 57300	428,161					0056330 0057300	4.9			

GROUNDWATER TREATMENT LOG

RACER-CVO
Ypsilanti, Michigan

Pre-Treatment Checklist												Treatment Checklist							
Start Date	Time	End Time	Frac-1 Valve Opened	Oil Check on pump	Bag Filter Changed yes no	Pre-Bag Filter Valve open & adjusted	Post-Bag filter Valve open	Post Secondary Carbon Vessel Valve Opened	Flow Totalizer reading (Cubic Feet)	Flow Totalizer reading (gallons) (cft x 7.48)	Discharge hose in Manhole	Bafilter & Carbon units burped	Bag filter pressure BF1/ BF2	Carbon filter pressure CF1/CF2	Flow Totalizer reading (Cubic Feet)	Flow Rate cubic feet/ min	Flow Rate gpm (cft/min x 7.48) not > 40 gpm	Samples collected for treatment operation	Samples collected for Permit
9/19/11	11:39		yes	yes	NO	yes	yes	yes	535752	433,546.518	yes	yes	7.5	2.0	0057595.7	4.9	36.6		START 13,940 423,846 6,820 GALS TREATED
9/19/11	12:39		"	"	"	"	"	"	0057850	432,718	"	"	8.0	2.0	0057850	4.9	36.6		
9/19/11	13:39		"	"	"	"	"	"	0058142	434,902	"	"	8.0	2.0	0058142	4.9	36.6		
9/19/11	14:39		"	"	"	"	"	"	0058439	437,124	"	"	7.5	2.0	0058439	4.9	36.6		
9/19/11	15:12		-	-	-	-	-	-	0058580	438,178	-	-	-	-	0058580	-	-		
10/17/11	9:25		yes	yes	yes	yes	yes	yes	0058580	439,179	yes	yes	10	2.0	0058580	4.7	35.0		12" INTANK 439,179 GALS CB ~11753 gallons
10/17/11	10:25		"	"	"	"	"	"	0058910	440,647	"	"	10	2.0	0058910	5.0 4.7 cb.	37.0		
10/17/11	11:25		"	"	"	"	"	"	0059215	442,928	"	"	10	2.0	0059215	4.9	36.7		
10/17/11	12:25		"	"	"	"	"	"	0059503	445,082	"	"	9.0	2.0	0059503	4.8	35.9		
10/17/11	13:25		"	"	"	"	"	"	0059774	447,110	"	"	9.0 cb	2.0	0059774	4.7	35.2		

GROUNDWATER TREATMENT LOG

RACER-CVO
Ypsilanti, Michigan

Pre-Treatment Checklist											Treatment Checklist								
Start Date	Time	End Time	Frac-1 Valve Opened	Oil Check on pump	Bag Filter Changed yes no	Pre-Bag Filter Valve open & adjusted	Post-Bag filter Valve open	Post Secondary Carbon Vessel Valve Opened	Flow Totalizer reading (Cubic Feet)	Flow Totalizer reading (gallons) (cft x 7.48)	Discharge hose in Manhole	Bagfilter & Carbon units burped	Bag filter pressure BFI/BF2	Carbon filter pressure CF1/CF2	Flow Totalizer reading (Cubic Feet)	Flow Rate cubic feet/min	Flow Rate gpm (cft/min x 7.48) not > 40 gpm	Samples collected for treatment operation	Samples collected for Permit
10/17/11	1425		yes	yes	yes	yes	yes	yes	0060042	Start 438 178 449 114	yes	yes	0.5	2.0	0060042	4.7	35.2		
10/17/11			-	-	-	-	-	-	0060105	449 585 454 073 cb	-	-	-	-	0060105	-	-		11407.4 a 15580.5/1108. gallons treated
11/16/11	815		yes	yes	yes	yes	yes	yes	0060105	449 585	yes	yes	12	3	0060105	4.9	36.7		
11/16/11	915		"	"	"	"	"	"	0060400	451 792	"	"	12	3	0060400	4.9	36.7		
11/16/11	1015		"	"	"	"	"	"	0060700	454 036	"	"	12	3	0060700	4.8	35.9		
11/16/11	1115		"	"	"	"	"	"	0060918	456 115	"	"	12	3	0060918	4.8	35.9		
11/16/11	1120 - 1230		shut system off																
11/16/11	1315		"	"	"	"	"	"	0061181	457 634	"	"	12	3	0061181	5.1	38.1		
11/16/11	1415		"	"	"	"	"	"	0061485	459 908	"	"	12	3	0061485	5.0	37.4		
11/16/11	1525		"	"	"	"	"	"	0061772	462 055	"	"	12	3	0061772	5.1	38.1		
note: System off from 1505-1520 (had to go get fuel).																			

GROUNDWATER TREATMENT LOG

RACER-CVO
Ypsilanti, Michigan

Pre-Treatment Checklist												Treatment Checklist							
Start Date	Time	End Time	Frac-1 Valve Opened	Oil Check on pump	Bag Filter Changed yes no	Pro-Bag Filter Valve open & adjusted	Post-Bag filter Valve open	Post Secondary Carbon Vessel Valve Opened	Flow Totalizer reading (Cubic Feet)	Flow Totalizer reading (gallons) (Cubic Feet x 7.48)	Discharge hose in Manhole	Bofilter & Carbon units burped	Bag filter pressure BFI/ BF2	Carbon filter pressure CF1/CF2	Flow Totalizer reading (Cubic Feet)	Flow Rate cubic feet/ min	Flow Rate gpm (cft/min x 7.48) not > 48 gpm	Samples collected for treatment operation	Samples collected for Permit
11/16/11	1615 cb.		yes	yes	yes	yes	yes	yes	0062040	449 585	yes	yes	12	3	0062040	5.1	38.1		
11/16/11	1640		"	"	"	"	"	"	0062130	464 732	"	"	—	—	0062130	—	—		treated w/15147 gallons
11/17/11	1015		"	"	"	"	"	"	0062130	Start 464 732	"	"	10	2	0062130	5.1	38.1		emptying water transferred into toles from frac tank with sump pump.
11/17/11	1300		"	"	"	"	"	"	0062244	465 585	"	"	—	—	0062244	—	—		w/853 gallons treated.

C.5 INDUSTRIAL USER PERMIT # RA 6-12



17303

YPSILANTI COMMUNITY UTILITIES AUTHORITY

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

June 14, 2011

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

CERTIFIED MAIL

RE: Industrial User Permit #RA 6-12

RECEIVED

JUN 15 2011

Dear Ms. Landale:

CRA-DETROIT

Enclosed please find industrial user permit #**RA 6-12** for the discharge of process wastewater from your facility (located at 2901 Tyler Road, Ypsilanti, MI) to the Ypsilanti Community Utilities Authority (YCUA) sewage treatment system. **The enclosed permit becomes effective on 15th day of June 2011. Please review the new permit in its entirety and be advised of the following special conditions established in Part 4, Section 1:**

- A. The permittee is only authorized to access MH6 (as referenced in Figure #1 of permittee's application) during the time that process wastewater is actively being treated and discharged to Outfall 001. At all other times, MH6 shall remain closed unless prior approval is granted by the YCUA.
- B. The permittee is required to report the total volume of process discharges to Outfall 001 by the 5th of every month for the previous calendar month.
- C. The permittee is not required to develop a Slug Discharge Management Plan unless otherwise directed by the YCUA.

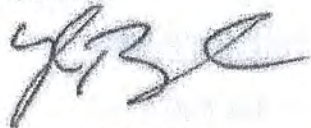
During the development of the enclosed permit, the YCUA reviewed your request to receive an exemption from flow proportional composite sampling. Based upon this review, **the YCUA is granting your facility an exemption from flow proportional composite sampling under 40 CFR 403.12(g)(3) for all self-monitoring requirements at Outfall 001.** The exemption is being provided on the basis that the information included in the submittal supports that time proportioned composite sampling at your facility will be representative of the discharge. Please be advised that your facility may be required to re-substantiate the exemption from flow proportional composite sampling when the enclosed permit expires or if discharge practices change.

Please be advised that self-monitoring reports are due on 20th day of the month following the reporting period. The minimum reporting frequency for your facility is quarterly as defined in the enclosed permit. The first self-monitoring report submittal from your facility is due on or before **July 20, 2011.**

Please also find enclosed various guidance documents for submitting industrial user self-monitoring reports, reporting parameter exceedances, and submitting follow-up reports. Upon request, the YCUA will conduct an on-site meeting with the your facility's staff to introduce and review these procedures, the industrial user permit, sampling requirements, and answer any questions your staff may have.

Please feel free to contact me with any questions regarding the new permit by phone at 734-484-4600 ext.123 or by email at lblackburn@ycua.org.

Sincerely,



Luther Blackburn
YCUA Industrial Pretreatment Program Supervisor

Enclosure(s): Industrial User Permit #RA 6-12
Industrial User Self-Monitoring Report Checklist
Reporting Requirements for Parameter Exceedances
30-Day Parameter Exceedance Report

Cc: Mr. Grant Trigger, R.A.C.E.R. Trust
Mr. Matthew Lamb, Conestoga-Rovers & Associates
YCUA Compliance Department File



Industrial User Self-Monitoring and Analytical Report Procedures and/or Requirements

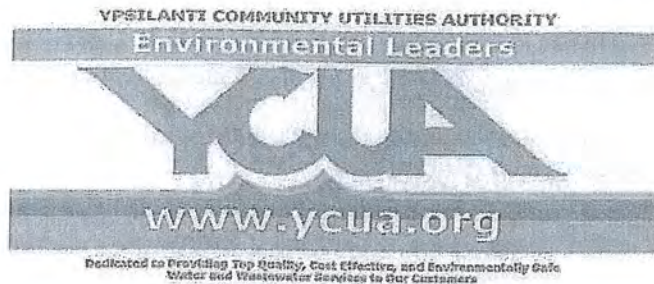
1. All handling and preservation of collected samples and laboratory analysis of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of a permit.
2. All reports shall include the name(s) and address(es) of the laboratory or laboratories used to perform each of the chemical analysis.
3. The test method used and analytical result of each required parameter.
4. A list of the lower level of detectability (detection level) for each parameter.
5. A report indicating quality control and assurance procedures and results for each parameter measured (spikes, percent recoveries, duplicates, relative percent difference, laboratory control samples, etc.).
6. A description or reference to the sample collection point. The lab report shall list the sample collection date.
7. A description of the sample preservation method used for each parameter. The analytical report shall list the date of analysis for each parameter.
8. All self-monitoring reports shall include a copy of the completed chain of custody forms and the analytical data sheets generated by the analytical laboratory along with a summation of the data submitted.

9. For reporting purposes, monthly reporting is as follows: January, February, March, April, May, June, July, August, September, October, November, and December. Semi-Annual: January thru June and July thru December. Quarterly: January thru March, April thru June, July thru September and October thru December. Self-monitoring reports are due on the 20th day of the month following the monitoring/reporting period.
10. Report flow data as required by permit: Total monthly flow in gallons or a daily average in gallons per day (gpd). For Industrial Users enrolled in the YCUA surcharge program, the dates of discharge and/or the total number of days the process ran are required.
11. The calculation of any required 4-day averages or additional information as requested in the appendix of the industrial user permit.
12. For Categorical Users with approved Total Organic Management Plans: In lieu of monitoring for TTO the following signed certification statement must be submitted monthly with your self-monitoring reports (40 CFR Part 413.03 (a)):

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the total organic management plan submitted to the control authority."

13. A cover letter by the Industrial User shall accompany all self-monitoring and analytical reports. The cover letter shall include the following certification statement signed by a responsible company official:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



INDUSTRIAL USER PERMIT #RA 6-12

Revitalizing Auto Communities Environmental Response Trust

2901 Tyler Road
Ypsilanti, Michigan 48198

is hereby authorized to discharge industrial wastewater from the above-identified facility and through the outfall identified herein into the Ypsilanti Community Utilities Authority's sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Non-compliance with any term or condition of this permit shall constitute a violation of the Ypsilanti Township Sewer Use Ordinance.

This permit shall become effective on the 15th day of June 2011 and shall expire at midnight on the 30th day of June 2012.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of the sewer use ordinance, a minimum of ninety (90) days prior to the expiration date.

Issued this 14th day of, June 2011

By: Larry R. Thomas
Larry R. Thomas, YCUA Director

PART 1 - EFFLUENT LIMITATIONS

- A. During the period from the 15th day of June 2011, to the 30th day of June 2012, the permittee is authorized to discharge process wastewater to the Ypsilanti Community Utilities Authority's sewer system from the outfall listed below.

Description of Outfall: MH6 (as referenced in Figure #1 of permittee's application) on 24" sanitary sewer main running north towards Tyler Pond to be referenced as Outfall 001.

Sample Point: For Sewer Use Ordinance/Permit #RA 6-12 compliance purposes, sampling shall be performed at the following location: Post treatment and prior to discharge into MH6, located 166 feet from south fence line and 71 feet from east fence line.

- B. During the period from June 15, 2011 to June 30th, 2012 the discharge from outfall 001 shall not exceed the following effluent limitations:

Effluent limitations are set forth in Appendix A attached hereto and made part hereof.

- C. During the period of June 15, 2011 to June 30th, 2012 the effluent from all other outfalls shall be of domestic or non-process wastewater only.
- D. All discharge shall comply with all other applicable laws, regulations, standards, and requirements contained in sewer use ordinance and any applicable State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this permit.

PART 2 - MONITORING REQUIREMENTS

- A. From the period beginning on the effective date of the permit until the 30th day of June 2012 the permittee shall monitor outfall number 001 for those parameters and at those frequencies as set forth in Appendix A attached hereto and made a part hereof.
- B. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 CFR Part 136 and amendments thereto unless specified otherwise in the monitoring conditions of this permit.

PART 3 - REPORTING REQUIREMENTS

A. Monitoring Reports

Monitoring results shall be reported as required in Appendix A. The first report is due on the 20th day of the month following the reporting period (e.g. January Monthly Report due on February 20). The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed as required, including flow measurements if required. The report format traditionally used, or a similar format, will continue to be an acceptable report format. Monitoring reports shall include a cover letter with a signed certification statement, laboratory reports, QA/QC data, and chain of custody for all parameters collected and analyzed.

B. Increased Monitoring

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by the EPA or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and results shall be reported in the periodic report submitted to the Ypsilanti Community Utilities Authority. Such increased monitoring frequency shall also be indicated in the periodic report.

C. Automatic Resampling

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the Ypsilanti Community Utilities Authority of the violation within 24 hours of becoming aware of the violation (notification must occur by phone, fax, or email); and

Revised June 14, 2011

2. A written follow up report shall be filed by the user with the YCUA within thirty days of a user becoming aware of the violation. The report shall specify the following:

- (1) A description of the violation, the cause thereof, and the violation's impact on the user's compliance status.
- (2) Duration of the violation, including exact dates and times of the violation, and if not corrected, the anticipated time the violation is expected to continue.
- (3) All steps taken or intended to be taken to reduce, eliminate and prevent reoccurrence of such a violation.

3. Repeat the sampling and pollutant analysis and submit, in writing the results of this second analysis within thirty (30) days after becoming aware of the violation.

D. Accidental Discharge Report

The permittee shall notify the Ypsilanti Community Utilities Authority immediately upon the occurrence of an accidental discharge of substances prohibited by sewer use ordinance or any slug loads or spills that may enter the public sewer system or the "Surface Waters of the State" (includes storm water drains). The Ypsilanti Community Utilities Authority shall be notified by telephone at (734) 484-4600. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.

Within five days following an accidental discharge, the permittee shall submit to the Ypsilanti Community Utilities Authority a detailed written report. The report shall specify:

1. Description and cause of the upset, slug load or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.
2. Duration of noncompliance, including exact dates and time of noncompliance and, if the non-compliance is continuing, the time by which compliance is reasonably expected to occur.
3. All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of noncompliance.
4. Report Submittal

All reports required by this permit shall be submitted to the Ypsilanti Community Utilities Authority

All permittees are required to develop and submit a current Slug Discharge Management Plan to the YCUA. The Slug Discharge Management Plan may part of an integrated plan provided it contains all the minimum requirements of 40 CFR 403.8(f)(2)(v) A-D. The submitted plan must include the YCUA and the Michigan Department of Natural Resources and Environment's (MDNRE) Pollution Emergency Alerting System (PEAS) in the notification process.

The Slug Discharge Management Plan can be developed in either of two ways:

1. Develop a Slug Discharge Management Plan Control Plan that contains at minimum all the requirements of 40 CFR 403.8 (f) (2) (v) A-D
2. Develop an integrated plan that includes at minimum all the requirements of a Slug Discharge Management Plan set forth in 40 CFR 403.8 (f) (2) (v) A-D.

Significant industrial users must notify the YCUA immediately if any changes occur at your facility that affect the Slug Discharge Management Plan or spill/slug potential.

If your facility does not have a Slug Discharge Management Plan or an integrated plan meeting the minimum requirements of 40 CFR 403.8 (f) (2) (v) A-D, one will be required to be submitted to the YCUA within 90 days of receiving an industrial user permit.

PART 4 - SPECIAL CONDITIONS

SECTION 1 - ADDITIONAL/SPECIAL REQUIREMENTS

- A. The permittee is only authorized to access MH6 during the time that process wastewater is actively being treated and discharged to Outfall 001. At all other times, MH6 shall remain closed unless prior approval is granted by the YCUA.
- B. The permittee is required to report the total volume of process discharges to Outfall 001 by the 5th of every month for the previous calendar month.
- C. The permittee is not required to develop a Slug Discharge Management Plan unless otherwise directed by the YCUA.

SECTION 2 - REOPENER CLAUSE

- A. This permit may be reopened and modified to incorporate any new or revised requirements contained in a National categorical pretreatment standard.
- B. This permit may be reopened and modified to incorporate any new or revised requirements resulting from the Ypsilanti Community Utilities Authority as are necessary to ensure POTW compliance with applicable sludge management requirements promulgated by EPA (40 CFR 503).

SECTION 3 - COMPLIANCE SCHEDULE – Not Applicable

PART 5 - STANDARD CONDITIONS

SECTION A. GENERAL CONDITIONS AND DEFINITIONS

1. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Modification and Termination

This permit may be modified or terminated for good causes including, but not limited to, the following:

- a. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements
- b. Material or substantial alterations or additions to the discharger's operation processes, or discharge volume or character which were not considered in drafting the effective permit
- c. A change in any condition in either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge
- d. Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel or the receiving waters
- e. Violation of any terms or conditions of the permit
- f. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting

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- g. Revision of or a grant of variance from such categorical standards pursuant to 40 CFR 13
- h. To correct typographical or other errors in the permit
- i. To reflect transfer of the facility ownership and/or operation to a new owner/operator
- j. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations
- k. Falsifying self-monitoring reports
- l. Tampering with monitoring equipment
- m. Refusing to allow timely access to the facility premises and records
- n. Failure to meet effluent limitations
- o. Failure to pay fines
- p. Failure to pay sewer charges
- q. Failure to meet compliance schedules

The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

5. Permit Appeals

The permittee may petition to appeal the terms of this permit within thirty (30) days of the notice. This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of the appeal. In its petition, the permittee must indicate the permit provisions objected to, the reasons for this objection, and the alternative condition, if any, it seeks to be placed in the permit.

The effectiveness of this permit shall not be stayed pending a reconsideration by the Board. If, after considering the petition and any arguments put forth by the Director, the Board determines that reconsideration is proper, it shall remand the permit back to the Director for re-issuance. Those permit provisions being reconsidered by the Director shall be stayed pending re-issuance.

A Board of Director's decision not to reconsider a final permit shall be considered final administrative action for purposes of judicial review.

6. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of Federal, State, or local laws or regulations.

7. Limitation on Permit Transfer

Permits may be reassigned or transferred to a new owner and/or operator with prior approval of the Director:

- a. The permittee must give at least thirty (30) days advance notice to the Director
- b. The notice must include a written certification by the new owner which:
 - (i) States that the new owner has no immediate intent to change the facility's operations and processes
 - (ii) Identifies the specific date on which the transfer is to occur
 - (iii) Acknowledges full responsibility for complying with the existing permit.

8. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must submit an application for a new permit at least ninety (90) days before the expiration date of this permit.

9. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

- a. The permittee has submitted a complete permit application at least ninety (90) days prior to the expiration date of the users existing permit.
- b. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

10. Dilution

The permittee shall not increase the use of potable or process water or, in any way, attempt to dilute an effluent as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

11. Definitions

- a. Daily Maximum: The maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- b. Composite Sample: A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The YCUA will require one of the following for the collection of composite samples:
 - Time composite sample: composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow.
 - Flow proportional composite sample: collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquots.

The method required for composite sampling is indicated in Appendix A.
- c. Grab Sample: An individual sample collected in less than 15 minutes without regard for flow or time.
- d. Instantaneous Maximum Concentration: The maximum concentration allowed in any single grab sample.
- e. Cooling Water:
 - Uncontaminated: Water used for cooling purposed only which has no direct contact with any raw material, intermediate, or final product and which does not contain a level of contaminants detectably higher than that of the intake water.
 - Contaminated: Water used for cooling purposes only which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides, or by direct contact with process materials and/or wastewater.
- f. Monthly Average: The arithmetic mean of the values for effluent samples collected during a calendar month or specified thirty (30) day period (as opposed to a rolling 30 day window).
- g. Weekly Average: The arithmetic mean of the values for effluent samples collected over a period of seven consecutive days.
- h. Bi-Weekly: Once every other week.
- i. Bi-Monthly: Once every other month.
- j. Upset: Means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee excluding such factors as operational error, improperly designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.
- k. Bypass: Means the intentional diversion of wastes from any portion of a treatment facility.

GENERAL PROHIBITIVE DISCHARGE STANDARDS

The permittee shall comply with all the general prohibitive discharge standards in the sewer use ordinance. Namely, the industrial user shall not discharge to the sewer system:

- A. Any liquids, solids or gases which by reason of their nature or quantity are, or may be, sufficient either alone or by interaction with other substances to cause fire or explosion or be injurious in any other way to the sewage works or to the operation of the sewage works.
- B. Solids or viscous substances that may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities.
- C. Any wastewater having a pH less than 5.0 or greater than 11.0; or wastewater having any other corrosive property capable of causing damage or hazard to structure, equipment, or personnel of the sewage works.
- D. Any wastewater containing toxic pollutants or of high chlorine demand in sufficient quantity, either singly or by interaction with other pollutants, to injure or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the sewage works, or exceed the limitation set forth in the EPA Categorical Pretreatment Standard, or any other Federal, State or County standards.
- E. Pollutants that result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause worker health and safety problems. This prohibition includes, but is not limited to, wastewaters which contain liquids, solids, or gases that cause gases, vapors, or fumes from the discharge to exceed 10% of the immediately dangerous to life and health (IDLH) concentration. Discharges which contain more than one pollutant which may contribute to fume toxicity shall be subject to more restrictive limitations, as determined necessary by the Director. The more restrictive discharge limits shall be calculated based on the additive fume toxicity of all compounds identified or reasonably expected to be present in the discharge.
- F. Any noxious or malodorous liquids, gases, or solids which either singly or by interaction with other wastes are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair.
- G. Any substance such as residues, sludge's, or scum that may cause the sewage works to be unsuitable for land application or reclamation and reuse or to interfere with the reclamation process.
- H. Any substance which will cause the sewage works to violate its NPDES Permit or the receiving water quality standards.

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- I. Any wastewater with color or sufficient light absorbance to interfere with treatment plant process, prevent analytical determinations, or create any aesthetic effect on the treatment plant effluent, such as, but not limited to, dye wastes and vegetable tanning solutions.
- J. Daily maximum concentration or mass loading shall not be exceeded on any single calendar day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetical measurement of the pollutant concentration derived from all measurements taken that day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged during the day. If a composite sample is required for a parameter, the determination whether the daily maximum limitation for that parameter has been exceeded on a single calendar day shall be based on the composite sample collected for that parameter on that calendar day. If grab samples are required for a parameter, the determination whether the daily maximum limitation for that parameter has been exceeded on a calendar day shall be based on the average of all grab samples collected for that parameter on that calendar day. If only one grab sample is collected for a parameter on a given day, the determination whether the daily maximum limitation for that parameter has been exceeded for the day shall be based on the results of that single grab sample. If the pollutant concentration in any sample is less than the applicable detection limit, that value shall be regarded as zero (0) when calculating the daily maximum concentration.
- K. Any wastewater having a temperature which will inhibit biological activity in the sewage works resulting in interference, but in no case wastewater with a temperature at the introduction into the sewage works which exceeds 60 degrees Celsius (140F) or is lower than 0 degree Celsius (32F).
- L. Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by applicable State or Federal regulations.
- M. Any wastewater that causes a hazard to human life or creates a public nuisance.
- N. Containing organic solvent extractable substances such as fats, wax, grease, or oils of petroleum origin, whether emulsified or not, in excess of 100 mg/l or containing substances which may solidify or become viscous at temperatures between 32 degrees F and at 140 degrees F.
- O. Gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids, gases or other pollutants which cause the wastewater to have a closed cup flashpoint of less than 140 degrees F, or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the POTW, or containing gasoline, benzene, xylene or toluene which causes the wastewater to exceed the State of Michigan Surface Water Quality Standards.
- P. Any garbage that has not been ground by household type or other suitable garbage grinders.
- Q. Any ashes, cinders, sand, mud, straw, shavings, metal, glass, rags, feathers, tar, plastics, wood, paunch, manure, or any other solids or viscous substances capable of causing obstructions or other interferences with proper operation of the sewer system.
- R. Toxic or poisonous substances in sufficient quantity to injure or interfere with any wastewater treatment process, to constitute hazards to humans or animals, or to create any hazard in waters, which receive, treated effluent from the sewer system treatment plant. Toxic wastes shall include, but are not limited to wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions.
- S. Solids of such character and quantity that special and unusual attention required for their handling.
- T. Any substance which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines or regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act or other regulations or criteria for sludge management and disposal as required by the State.
- U. Any medical or infectious wastes prohibited from being discharged under Federal or State law and regulations.
- V. Any pollutant, including BOD pollutants, released at a flow rate and/or pollutant concentration which would cause interference with the treatment plant.
- W. Material considered a hazardous waste under the Resource Conservation and Recovery Act (RCRA).
- X. Any commercial or industrial waste that may cause pass through of pollutants or interference with the wastewater treatment plant operations or that violates Federal, State, or local restrictions.
- Y. Trucked and hauled wastes, except at discharge points designated by YCUA.
- Z. Pollutants causing toxic gases, vapors, and fumes.
- AA. Any leachate from a hazardous waste landfill.
- BB. Any landfill leachate unless permitted and authorized under a written contract, within YCUA's sole discretion, between YCUA and the User.
- CC. Any pollutant discharge which constitutes a slug.

Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this permit does not relieve the permittee from its obligations regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control and related appurtenances which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process control, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control its production or discharges or both until operation on the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment Facilities

- a. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist.
- b. The permittee may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure efficient operation.
- c. Notification of bypass:

Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the Ypsilanti Community Utilities Authority and submit a written notice to the POTW within 5 days. This report shall specify:

- (i) A description of the bypass, and its cause, including its duration;
- (ii) Whether the bypass has been corrected; and
- (iii) The steps being taken or to be taken to reduce, eliminate, and prevent a re-occurrence of the bypass.

4. Removed Substances

Solids, sludge's, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act and all laws and regulations of the State of Michigan.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points and with the method specified in this permit (Appendix A) and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected and maintained to ensure their accuracy. Monitoring points shall not be changed without notification to and the approval of the Ypsilanti Community Utilities Authority.

2. Flow Measurements

If flow measurement is required by this permit, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

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3. Analytical Methods to Demonstrate Continued Compliance

All sampling and analysis required by this permit shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA, or as specified in this permit.

4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit using test procedures identified in PART 5 Section C 3., the results of this monitoring shall be included in the permittee's self-monitoring reports.

5. Inspection and Entry

The permittee shall allow the Ypsilanti Community Utilities Authority, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times any facilities, equipment, including monitoring and control equipment, practices, or operations regulated or required under this permit;
- d. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and
- e. Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under the permit, could originate, be stored, or be discharged to the sewer system.

6. Retention of Records

- a. The permittee shall retain records of all monitoring information, including, all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of this sample, measurement, report or application. This period may be extended by request of the Ypsilanti Community Utilities Authority at any time.
- b. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Ypsilanti Community Utilities Authority shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

7. Record Contents

Records of sampling and analyses shall include:

- a. The date, exact place, time, and methods of sampling or measurements, and sample preservation techniques or procedures;
- b. Who performed the sampling or measurements;
- c. The date (s) analyses were performed;
- d. Who performed the analyses;
- e. The analytical techniques or methods used; and
- f. The results of such analyses.

8. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions and/or civil penalties.

SECTION D. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

The permittee shall give notice to the Ypsilanti Community Utilities Authority 90 days prior to any facility expansion, production increase, or process modifications that results in new or substantially increased discharges or a change in the nature of the discharge.

2. Anticipated Noncompliance

The permittee shall give advance notice to the Ypsilanti Community Utilities Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

3. Duty to Provide Information

The permittee shall furnish to the Ypsilanti Community Utilities Authority, within ten (10) days any information which the Ypsilanti Community Utilities Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also, upon request, furnish to the Ypsilanti Community Utilities Authority within ten (10) days copies of any records required to be kept by this permit.

4. Signatory Requirements

All applications, reports, or information submitted to the Ypsilanti Community Utilities Authority must contain the following certification statement and be signed as required in Sections a, b, c, or d below:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

- a. By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or; the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second quarter 1990 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- b. By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.
- c. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.
- d. By a duly authorized representative of the individual designated in paragraph a, b, or c of this section if:
 - (i) the authorization is made in writing by the individual described in paragraph a, b, or c;
 - (ii) the authorization specifies wither an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or a well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - (iii) The written authorization is submitted to YCUA.
- e. If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for the environmental matters for the company, a new authorization satisfying the requirements of paragraph d of this section must be submitted to YCUA prior to or together with an reports to be signed by an authorized representative.

5. Operating Upsets

A permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or with the Sewer Use Ordinance shall inform the Ypsilanti Community Utilities Authority within 24 hours of becoming aware of the upset at (734) 484-4600, including weekends and holidays. A written follow-up report of the upset shall be filed by the permittee with the Ypsilanti Community Utilities Authority within five days. The report shall specify:

- a. Description of the upset, the cause(s) thereof and the upset's impact on the permittee's compliance status;
- b. Duration of noncompliance, including exact dates and times of noncompliance, and if not corrected, the anticipated time the non-compliance is expected to continue; and
- c. All steps taken or to be taken to reduce, eliminate and prevent reoccurrence of such an upset.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner.

A documented and verified operating upset shall be an affirmative defense to any enforcement action brought against the permittee for violations attributable to the upset event.

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6. Annual Publication

A list of all industrial users, which were subject to Significant Non-Compliance (SNC) according to Title 40 Code of Federal Regulations (CFR) Part 403.8(D)(vii)(B) during the twelve (12) previous months, shall be annually published by the Ypsilanti Community Utilities Authority in the Ann Arbor News, the Ypsilanti Press, The Canton Observer, The Detroit News or the Detroit Free Press. Accordingly, the permittee is apprised that noncompliance with this permit may lead to an enforcement action and may result in publication of its name in an appropriate newspaper in accordance with this section.

7. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under sewer use ordinance or State or Federal laws or regulations.

8. Penalties for Violations of Permit Conditions

The sewer use ordinance provides that any person who violates a permit condition may be subject to a civil penalty of \$1000 per day of such violation. Any person who willfully or negligently violates permit conditions is subject to criminal penalties of a fine of up to \$500 per day of violation, or by imprisonment for 90 days(s), or both. The permittee may also be subject to sanctions under State and/or Federal law.

9. Recovery of Costs Incurred

In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or sewer use ordinance or causing damage to or otherwise inhibiting the Ypsilanti Community Utilities Authority wastewater disposal system shall be liable to the Ypsilanti Community Utilities Authority for any expense, loss, or damage caused by such violation or discharge. The Ypsilanti Community Utilities Authority shall bill the permittee for the costs incurred by the Ypsilanti Community Utilities Authority for any cleaning, repairing, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation of the sewer use ordinance.

APPENDIX A

INDUSTRIAL PRETREATMENT SELF-MONITORING REQUIREMENTS FOR: REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST Non-Categorical Industrial User

Revitalizing Auto Communities Environmental Response Trust is required to monitor the industrial wastewater discharge from **Outfall 001** to the YCUA sanitary sewer in accordance with methods set forth in 40 CFR Part 136 for the following parameters at the stated frequency. For reporting purposes, **monthly reporting** is as follows: January, February, March, April, May, June, July, August, September, October, November, and December. **Quarterly**: January - March, April - June, July - September, and October - December. **Semi-Annual**: January - June and July - December.

Monitoring reports are due on the 20th day of the month following the reporting period.

PARAMETER	UPPER LIMIT (mg/l) REPORT	MONITORING FREQUENCY	REPORTING FREQUENCY	SAMPLE TYPE
FLOW (GAL)		ONCE / DISCHARGE	MONTHLY / QUARTERLY*	METERED
1,2-DICHLOROETHANE	0.50	MONTHLY	QUARTERLY	GRAB
TRICHLOROETHENE	0.50	MONTHLY	QUARTERLY	GRAB
VINYL CHLORIDE	0.20	MONTHLY	QUARTERLY	GRAB
POLYCHLORINATED BIPHENYLS	<0.0002**	MONTHLY	QUARTERLY	24-HOUR TIME PROPORTIONED COMPOSITE
pH	≥ 5.0 AND ≤ 11.0 S.U.	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
BENZENE	0.50	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
CARBORN TETRACHLORIDE	0.50	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
CHLOROBENZENE	100.00	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
CHLOROFORM	6.00	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
1,4-DICHLOROBENZENE	7.50	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
1,1-DICHLOROETHENE	0.70	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
METHYL ETHYL KETONE	200.00	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
TETRACHLOROETHENE	0.70	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
TOTAL PHENOLICS	1.00	SEMI-ANNUAL	SEMI-ANNUAL	GRAB
CHEMICAL OXYGEN DEMAND	600.00	SEMI-ANNUAL	SEMI-ANNUAL	24-HOUR TIME PROPORTIONED COMPOSITE

* As established in Part 4, Section B - Special Conditions: The permittee is required to report the total volume of process discharges to Outfall 001 by the 5th of every month for the previous calendar month. The permittee shall additionally report a summary of individual discharges during the reporting quarter. The quarterly summary shall accompany the permittee's monitoring report submittal.

** Any discharge at or above the level of detection shall be a specific violation of the Permit. For polychlorinated biphenyls analysis, the sampling and analytical protocol for compliance shall be in accordance with EPA Method 608 employing a detection level of 0.0002 mg/l unless a higher detection limit is appropriate due to sample matrix interference.

In addition to the self-monitoring requirements specified above, the Control Authority (YCUA) will perform sampling and analysis of the Revitalizing Auto Communities Environmental Trust's wastestream a minimum of one (1) time per year.

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Reporting Requirements for Parameter Exceedance

Instructions: If the results of the permittee's wastewater analysis indicate that a violation of the permit has occurred, the permittee must:

1. Inform the Ypsilanti Community Utilities Authority of the violation within 24 hours of becoming aware of the violation. Mailing a letter the day of the violation does not guarantee notification within 24 hours. Notification shall include a phone call, fax, or email to YCUA at the following:

Phone: 734-484-4600 Ext.123

Fax: 734-544-7149

Email: lblackburn@ycua.org

2. The user shall file a written follow up report with the YCUA within thirty (30) days of becoming aware of the violation. The report shall include the following elements:
 - A. Laboratory report with chain of custody for wastewater analysis that indicated the violation.
 - B. Laboratory report with chain of custody for pollutant re-sampling.
 - C. A description of the violation, the cause thereof, and the violation's impact on the user's compliance status.
 - D. Duration of the violation, including exact dates and times of the violation, and if not corrected, the anticipated time the violation is expected to continue.
 - E. All steps taken or intended to be taken to reduce, eliminate and prevent reoccurrence of such a violation.
 - F. Cover letter (if YCUA report form is not used) with a certification statement.

A generic format for the written follow up report has been provided and is available electronically upon by request. If an alternative form is used, it must include at minimum the above information requested in the YCUA form. The written follow up report must be submitted by mail or fax only.



Industrial Pretreatment Program

30-Day Parameter Exceedance Report

Attach additional sheets if necessary

- 1) Facility Name: _____
- 2) Permit#: _____
- 3) Representative reporting violation: _____
- 4) Representative's title: _____
- 5) Date and time violation was initially reported to YCUA: _____

- 6) Notification was provided via: ☐ Phone ☐ Fax ☐ E-Mail
- 7) Describe the violation, the cause thereof (indicate if unknown), and the violation's impact on the user's compliance status: _____

- 8) Indicate the duration of violation, including the exact date and time of violation, and if not corrected, the anticipated time the violation is expected to continue (indicate if changes were made in the treatment process): _____

9) Indicate steps being taken to reduce, eliminate, and prevent a reoccurrence of the violation:

10) Attach laboratory report with chain of custody for wastewater analysis that indicated the violation.

11) Attach laboratory report with chain of custody for pollutant re-sampling.

Certification Statement

" I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Name of Representative (please print): _____

Signature: _____

Title: _____

Date: _____

Please forward the above report with all necessary attachments by mail or fax to the following:

Industrial Pretreatment Program Supervisor
Ypsilanti Community Utilities Authority
2777 State Rd.
Ypsilanti, MI 48198