

CITY OF TOLEDO



DEPARTMENT OF PUBLIC UTILITIES

December 20, 2013

RACER Trust
c/o Ms. Pamela L. Barnett, PG
Assembly Region Cleanup Manager
500 Woodward Avenue, Suite 1510
Detroit, MI 48226

RE: Unusual Discharge Permit #1401

Dear Ms. Barnett:

Per your request on December 06, 2013, the City of Toledo hereby grants RACER Properties LLC permission to discharge to the City of Toledo's sanitary sewer system from the facility located at 1455 W. Alexis Road, Toledo, Ohio 43612. This permit is valid from January 01, 2014 until December 31, 2014. You will be required to maintain compliance with the following stipulations while discharging:

- RACER Properties LLC shall maintain compliance with the Toledo Municipal Code, Chapters 929, 930 and 1775 at all times. The provisions of these chapters shall apply to all discharges from RACER Properties LLC site location.
- RACER Properties LLC shall maintain compliance with the attached parameters. Fines or penalties for such violations will be established per TMC Code 930.
- RACER Properties LLC shall immediately notify the Toledo Division of Environmental Services (TDOES) of any modifications to the pre-treatment system and/or any entity associated with the system.
- RACER Properties LLC shall immediately notify TDOES of any malfunctions and/or upsets of the process and pretreatment system.
- RACER Properties LLC shall submit any potential process changes to TDOES for review prior to implementation of such changes.
- **RACER Properties LLC shall cease all discharges in heavy rain events, which may cause bypass of the Wastewater Treatment Plant.**
- RACER Properties LLC shall permit TDOES representatives access to the site for inspections and verification of discharged materials. Monitoring of the discharge will take place prior to, during and once discharge is complete.
- **RACER Properties LLC is permitted to discharge Monday-Sunday during the hours of 1:00 p.m. to 5:00 a.m. (Approval from our Division is required if additional days or times are needed).**
- RACER Properties LLC shall maintain flow that does not exceed 50 gpm.
- **RACER Properties LLC shall sample on a semi-annual basis and submit the analytical data to TDOES, attention Carrie H. Johnson. This site will also be inspected and billed on a quarterly basis. A meter reading will be taken during the inspection.**
- **RACER Properties LLC is aware that the surcharge rates stated in the application are subject to change (increase) during the life of the permit.**

Timothy D. Murphy, Commissioner
DIVISION OF ENVIRONMENTAL SERVICES
Quilter Environmental Center

348 South Erie Street, Toledo, Ohio 43604-8633 USA

Telephone: 419-936-3015 Fax: 419-936-3959 E-mail: tim.murphy@toledo.oh.gov

The Director of Public Utilities or his representative, the Toledo Division of Environmental Services (TDOES), shall be responsible for the administration and enforcement of this permit. The City of Toledo, Division of Environmental Services has the authority to revoke all permits to discharge and to cease operations if any of the above requirements and the Permit for Unusual Discharge is violated. This permit does not exempt RACER Properties LLC from any federal, state, or local environmental law or regulation. This permit expires on December 31, 2014.

If you should have any questions, please do not hesitate to contact me at (419) 936-3940 or carrie.johnson@toledo.oh.gov.

Respectfully,



Carrie H. Johnson
Senior Environmental Specialist

Cc: Andrew LaVine, Conestoga-Rovers & Associates (CRA)
Unusual Discharge file

Acceptable Criteria for Discharge

<u>Parameter</u>	<u>Units</u>	<u>Limit (Not to Exceed)</u>
Cadmium, Total	mg/L	0.3
Copper, Total	mg/L	1.0
Lead, Total	mg/L	1.5
Nickel, Total	mg/L	2.9
Zinc, Total	mg/L	6.3
Silver, Total	mg/L	0.2
Mercury, Total	mg/L	0.0002 (BMP's)*
Chromium, Hexavalent	mg/L	0.8
Arsenic, Total	mg/L	0.6
Cyanide, Total	mg/L	1.1
Oil & Grease (TPH)	mg/L	100 (avg.)/250(grab)
Total Toxic Organics	mg/L	5.0
Benzene**	mg/L	0.14
Toluene**	mg/L	1.36
Ethyl Benzene* *	mg/L	1.59
Xylene **	mg/L	0.41
LEL	%	10
PCB, Total	mg/L	0.007
pH	s.u.	5-12

*Best Management Practices: Parameter shall be managed by BMPs.

** For not to exceed threshold limit values refer to U.S. EPA's "Guidance to Protect POTW Workers from Toxic and Reactive Gases and Vapors".