

Significant Industrial User Inspection / Evaluation

Date:	10/9/2014	Time:	10:15 am	Inspector(s):	Luther Blackburn/Sree Mullanpudi
Facility Representative(s) Present:		Beth Landale (CRA Project Manager)			
Information confidential pursuant to 40 CFR 403.14: ☐ Yes ☒ No Inspection Scheduled: ☒ Yes ☐ No					

Section A. General Information

- Facility Name: R.A.C.E.R. Trust – Company Vehicle Operations (CVO) Site
- Parent Company / Affiliation: _____
- Facility Location: 2901 Tyler Road
Ypsilanti, MI 48198
- Facility Mailing Address: CRA - Plymouth Office
14496 Sheldon Road, Plymouth, MI 48170
- Authorized Representative: Grant Trigger Position: Deputy Cleanup Manager-MI
Phone Number: 313-486-2908 Mobile: 313-670-6226
Email Address: gtrigger@racertrust.org
- Facility Contact: Beth Landale Position: CRA Project Manager
Phone Number: 734-357-5528 Mobile: 734-545-5423
Email Address: blandale@croworld.com
- Permit Number: RA# 12-15 Expiration Date: 12/31/2015 Date of Last Inspection: 10/04/2013

Section B. Operational Information

- Description of business activity, products, or services: The facility ceased remedial investigation and subsequent treatment of groundwater and discharge to YCUA Collection System. The last wastewater discharge took place on December 16, 2013.
- Formerly this facility undertook Remediation and redevelopment of former General Motors Corporation Property – Company Vehicle Operations (CVO) at 2901 Tyler Road, Ypsilanti. The property is a 22-acre parcel located southwest of the large Willow Run Powertrain facility, the CVO is located on the banks of

Tyler Pond and includes a paved parking area.

3. RACER TRUST undertook remediation of groundwater at this site which included extraction of contaminated groundwater from this site, treatment and discharge of treated groundwater to YCUA collection system. The pretreatment of contaminated groundwater included removal of suspended solids followed by removal of chlorinated hydrocarbons by Granular Activated Carbon (GAC) vessels.

4. Description of manufacturing or fabrication processes: None

5. Standard Industrial Classification (SIC) or North American Industry Classification System (NAICS) Code(s):
None identified

6. Number of employees: None. Schedule of Operation: N/A
 Hours/day: N/A Days/week: N/A
 Shifts/day: N/A Months/Year: N/A.

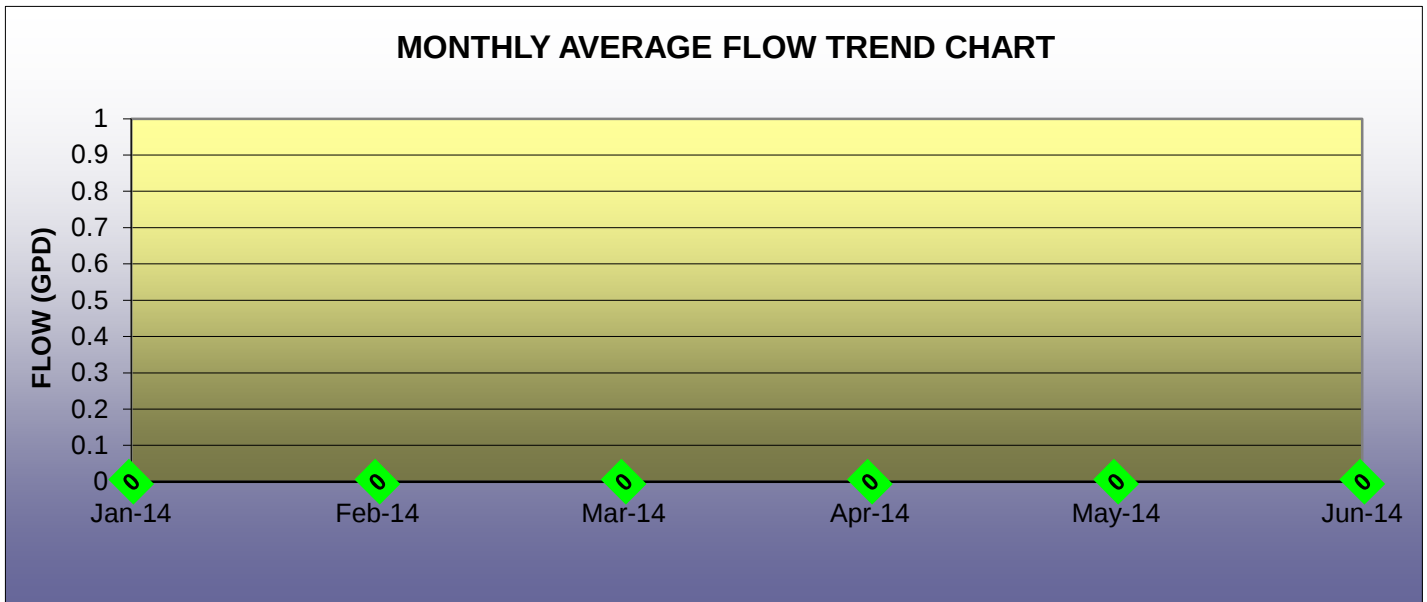
7. Water Supply: ☒ Municipal ☐ Well ☐ Other: _____

8. Environmental Permits:
 - A. NPDES Permit: _____
 - B. Air Permit: _____
 - C. RCRA: ☒ Generator ☐ Storage > 90 Days ☐ Treatment
 Permit: MIK468293311
 - D. DWSD Permit: Facility is located within YCUA Collection System
 - E. Other: _____

9. Categorical User: ☐ Yes ☒ No
 If Applicable:
 - A. Category: _____
 - B. Subpart: _____

10. Wastewater Flow(s):

- A. Process: As of January 1, 2014 the facility ceased discharge of any treated groundwater. The last discharge took place on 12/16/2013, shortly thereafter the onsite groundwater treatment system was decommissioned. The facility formerly discharged an average of - 13,032 Gal/Batch; MAX – 16,531 Gal/Batch (April – Sept. 2013)
- B. Sanitary: N/A
- C. Non-contact cooling water: N/A
- D. Boiler Blowdown: N/A
- E. Irrigation: N/A
- F. Other: _____
- G. Measurement: N/A
- H. Is flow measured at proper locations (i.e. influent flow is measured before all return lines and effluent flow is after all return lines): ☐ Yes ☐ No N/A
- I. Calibration: N/A
- J. Graph:



- K. Comments: Facility reported no wastewater discharge between January – September 2014

Section C. Pretreatment Information

1. Process generating wastewater: The facility reported no wastewater discharge between January and September 2014. The last discharge of treatment groundwater took place on December 16, 2013 and subsequently the onsite groundwater treatment system has been decommissioned.
2. Formerly, the pretreatment involved collection of groundwater from a french drain located along a sheet pile wall on the south bank of Tyler Pond. The collected groundwater was then pumped into a 20,000-gallon equalization/batch tank and treated to removed suspended solids and chlorinated hydrocarbons prior to discharge to YCUA Collection System.
3. In October 2013, the Environmental Quality Company (EQ) was contracted to remove the source material responsible for the groundwater contamination. YCUA issued approval for discharge of groundwater from the excavation area in correspondence dated May 17, 2013.

4. Description of Pretreatment: N/A

5. Design flow for treatment system: N/A
 - A. Discharge Schedule: None at this time
 - B. Type of Discharge: ☐ Continuous ☐ Intermittent ☒ Batch
If Applicable: Batch Volume _____ Discharge Frequency _____
6. Are all treatment units, other than back up units in service: N/A

7. Is there a full-time qualified operator: ☐ Yes ☐ No ☒ N/A
If yes, what training has the operator been provided? _____
Does the operator possess licensing? No.
8. Are replacement parts available for critical components: ☐ Yes ☐ No ☒ N/A
9. Are treatment chemicals readily available: ☐ Yes ☐ No ☒ N/A
10. Is there an operation and maintenance manual available to staff: N/A

11. Is there a potential for a by-pass of the treatment system: ☐ Yes ☒ No
If yes, explain? _____

12. Is sludge generated due to the treatment process? ☐ Yes ☐ No ☒ N/A

If yes:

Waste Characterization: _____

What is the method of disposal? _____

Section D. Storage Areas

1. Has facility submitted a chemical / material inventory? ☐ Yes ☐ No ☒ N/A

If yes, has there been any significant change at the facility which requires an update? MSDSs for conditioning activities were submitted in March 2013 (Sodium Persulfate, Calcium Oxide, RemOxL – liquid oxidant containing about 40% sodium permanganate).

2. Description of chemical / material inventory location(s): N/A

3. Are there floor drains in the chemical / material inventory locations? ☐ Yes ☒ No

If yes, where do the drains discharge to: _____

4. Description of waste inventory location(s): Currently, Facility does not store any materials on site except for some empty totes which were formerly used for groundwater collection.

5. Are there floor drains in the waste inventory locations? ☐ Yes ☒ No

If yes, where do the drains discharge to: _____

6. Are there floor drains in the production area? ☐ Yes ☒ No

If yes, where do the drains discharge to: _____

Section E. Spill Control

1. Has the facility submitted a Slug Discharge Management Plan? ☐ Yes ☒ No

If yes, has the plan been reviewed and approved by the YCUA in accordance with 40 CFR 403.8(f)(2)(v)?

Permittee was not required to develop a Slug Discharge Management Plan.

If no, has facility been issued a compliance date for submitting a plan? _____

2. Has the facility been responsible for any slug discharges or spills since the last inspection? No.
-
-

3. If applicable, has the facility submitted a Toxic Organic Management Plan to the YCUA?

☐ Yes ☐ No ☒ N/A

Comments: _____

4. Has the facility submitted any other contingency plans to the YCUA? ☐ Yes ☒ No

Comments: _____

Section F. Non-Discharged Wastes

1. Does the facility generate waste liquids or sludges that are not disposed of in the sanitary sewer system?

☐ Yes ☐ No ☒ N/A If no, omit the remaining questions in this section.

2. Does the facility complete manifests for any of these wastes? ☐ Yes ☐ No ☒ N/A

Comments: _____

3. Does the facility maintain an inventory for these wastes? ☐ Yes ☐ No ☒ N/A
4. Has there been any significant changes since the previous inspection / permit application? ☒ Yes ☐ No

If yes, describe: The facility ceased discharge of wastewater to YCUA collection system following the removal of source of groundwater contamination. As of January 1, 2014 the facility ceased discharge of wastewater. The last wastewater discharge took place on 12/16/13 and subsequently the on-site pretreatment system was decommissioned.

Permittee expanded remediation activities in October 2013. EQ was contracted by the permittee to remove the source material responsible for the site contamination.

5. Description of significant wastes generated if permit application or separate inventory is not available and/or current (estimate quantity disposed of in an average year):

<u>Waste Generated</u>	<u>Quantity/Year</u>	<u>Waste Generated</u>	<u>Quantity/Year</u>
☐ Solvent	_____	☐ Waste Product	_____
☐ Used Oil	_____	☐ Grease	_____
☐ Plating Wastes	_____	☐ Treatment Sludge	_____
☐ Grease	_____	☐ Paints	_____
☐ Thinner	_____	☐ Organics	_____
☐ Pesticides	_____		
☐ Other:	_____		
_____	_____		
_____	_____		
_____	_____		

6. List outside firms that remove any of the above described wastes:

- 1) _____
- 2) _____
- 3) _____

7. Has the facility notified the YCUA of substances discharged to the sanitary sewer collection system that if otherwise disposed of, would have been classified a hazardous waste under 40 CFR Part 261 as required in 40 CFR 403.12(p): ☐ Yes ☐ No ☒ N/A

If yes, describe: _____

Section G. Sampling Procedures / Self-Monitoring

1. Does facility maintain self-monitoring data on file for a minimum of 3 years as required by the permit?

☒ Yes ☐ No If no, please comment: _____

2. Who performs sampling of the permittee's wastewater? N/A

3. Are sampling techniques in accordance with 40 CFR Part 136? ☐ Yes ☐ No ☒ N/A

If no, please comment: _____

4. Does the facility properly obtain samples from the identified compliance point? ☐ Yes ☐ No ☒ N/A

If no, please comment: _____

5. Does the facility conduct any process control analyses? ☐ Yes ☐ No ☒ N/A

If yes, please describe: _____

6. Who conducts the facility's permit required analyses? N/A

7. Is an appropriate QA/QC program in place for permit required analyses? N/A

8. Description of visual characteristics of effluent (if facility was discharging): No discharge.

If facility was discharging, record time of observation: _____

Section H. Compliance Status

1. List any enforcement response(s) issued by the YCUA since last inspection:

No enforcement action has been issued since the previous inspection.

Section I. Evaluation

- 1) Comments:

- a) The facility completed remedial activities and ceased discharge of treated groundwater. The last wastewater discharge took place on December 16, 2013 and subsequently decommissioned pretreatment system at the site. The facility reported no wastewater discharge between January and September 2014.
- b) The current annual industrial user inspection has corroborated the facility's notification that treatment of contaminated groundwater and discharge of treated groundwater to YCUA collection system has ended. The inspection did not reveal any onsite activities and pretreatment units. However, the groundwater monitoring wells exist at the site.
- c) Facility submitted a letter report dated September 25, 2014 titled "Final Quarterly Self-Monitoring Report/Formal Permit Cancellation Request". Per this report, no wastewater discharge is reported from January through September 2014 and that it serves as request for cancellation of the current Industrial User Permit #RA 12-15. The report notes that the last wastewater discharge occurred on December 16, 2013 and subsequently the pretreatment system was decommissioned.
- d) The facility noted in its final report that the interim remedial measures undertaken at the site to remove the source of groundwater contamination has resulted in decreased pollutant concentrations and resulted in discontinuation of the need for groundwater treatment and disposal.
- e) The facility informed YCUA that it will continue to monitor the site for groundwater contamination and that if a future need arises for disposal of treated groundwater, a new request and permit application would be submitted to YCUA

- 2) Recommendations / Required Actions:

- a) Based on the information presented in the final quarterly self-monitoring report/formal permit cancellation request industrial user permit #RA 12-15 from the facility and the current annual industrial user inspection, YCUA IPP deems that the facility's request for termination of industrial user permit #RA12-15 as appropriate. A recommendation to the Director of Wastewater/Compliance is made for the termination of the industrial user permit #RA 12-15 and the billing of monthly IPP funding charge.
- b) As noted earlier the facility shall provide a written notification to YCUA and reapply for an industrial user permit, if a future remedial investigation warrants the discharge of treated groundwater. Future reapplication for wastewater discharge permit shall be made at least 90 days prior to planned discharge. Further, all pertinent analytical data shall accompany the discharge permit application. Future discharge permit application shall be treated as new source wastewater discharge permit application.

Completed by:



Sree Mullapudi, P.E.
Compliance Supervisor
Date: October 18, 2014