



**CONESTOGA-ROVERS
& ASSOCIATES**

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September 25, 2014

Reference No. 017303

Mr. Sreedhar Mullapudi
YCUA Industrial Pretreatment Program Supervisor
Ypsilanti Community Utilities Authority
2777 State Road
Ypsilanti, MI 48198-9112

Dear Mr. Mullapudi:

Re: Final Quarterly Self-Monitoring Report/Formal Permit Cancellation Request
Industrial User Permit #RA 12-15
RACER Trust
Company Vehicle Operations Area (CVO)
2901 Tyler Road
Ypsilanti, Michigan

Pursuant to requirements of Industrial User Permit # RA 12-15 (Permit), the permittee is required to submit self-monitoring reports by the 20th of every month following the reporting period specified in Parts III and IV of the Permit. Conestoga-Rovers & Associates (CRA) has prepared this self-monitoring report on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust. This letter also serves as the formal request for cancellation of the Permit.

This final self-monitoring report summarizes the discharge information for the third quarter (July through September) of 2014.

During the months of July through September, 2014, there was no treated water discharged to the YCUA sewer. The last water discharge took place on December 16, 2013. The system was decommissioned shortly after this final discharge. Attachment A provides a summary of the Permit required sampling.

RACER applied for an Industrial User Permit in June 2011 to discharge impacted groundwater that was recovered and treated prior to discharge. Over the fall and winter of 2013, RACER implemented an Interim Measure that removed the source of the groundwater impacts. Post implementation sample results indicate groundwater concentrations have substantially decreased, and groundwater recovery is not occurring. Therefore, at this time there is no planned treatment and or discharge of water to the YCUA sewer.

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- 2 -

There are no future planned activities at the Site involving wastewater storage, management, treatment or discharge. Should this change, CRA/RACER shall provide written notification to YCUA and reapply for an Industrial User Permit. A Site inspection will be scheduled at the earliest convenience of YCUA to review the current Site conditions.

Should you have any questions, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Beth Landale, PE
Project Manager

DB/bw/6/Det.
Encl.

cc: Grant Trigger, RACER
Dave Favero, RACER

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.

Grant Trigger
Michigan Cleanup Manager
Revitalizing Auto Communities Environmental Response Trust

ATTACHMENT A

Page 1 of 1

**YPSILANTI COMMUNITY UTILITIES AUTHORITY
INDUSTRIAL USER PERMIT SELF MONITORING REPORT
REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST**

Facility : Company Vehicle Operations Area
Permit No.: RA 12-15
Sample Point: Post Treatment and Prior to discharge into MH6

Reporting Period
Year 2014
Quarter I, II, III

Sample Date					1/2014	2/2014	3/2014	4/2014	5/2014	6/2014	7/2014	8/2014	9/2014
Sample Location					na	na	na	na	na	na	na	na	na
Sample ID					No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time	No sample collected as system was decommissioned, no planned discharge at this time
Parameter	Upper Limit (mg/l)	Monitoring Frequency	Reporting Frequency	Sample Type									
Flow (GAL)	Report	Once/Discharge	Monthly/Quarterly*	Metered	0	0	0	0	0	0	0	0	0
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 proportionated Composite***	--	--	--	--	--	--	--	--	--
pH	≥ 5.0 and ≤ 11.0 S.U	Semi-Annual	Semi-Annual	Grab	--	--	--	--	--	--	--	--	--
Benzene	0.50	Semi-Annual	Semi-Annual	Grab	--	--	--	--	--	--	--	--	--
Carbon 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	--	--	--	--	--	--	--	--	--

Notes

* 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 PCB 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.

***PCBs are not 24 hour composites but time proportionated composites while the system is treating and discharging.