



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 30, 2012

John-eric Pardys B.A.Sc.
Conestoga-Rovers & Associates (CRA)
651 Colby Drive
Waterloo, ON N2V 1C2

Dear Mr. Pardys:

SUBJECT: Storm Water Compliance Inspection
NPDES Permit No. MI0059042
RACER-Saginaw Nodular Indust

The SWPPP for Racer-Nodular Iron site, located at 2100 Veterans Memorial Parkway, Saginaw, Michigan, has been reviewed. Enclosed is a list of corrections that we request be made in the plan. The list of corrections is broken into five categories: site map, identification of significant materials, nonstructural controls, structural controls, and signatures. The corrections or additions will be numbered for easier reference within these categories.

Remove Permit MIS110000 from the appendix as it does not apply to this facility. They are authorized to discharge non-storm water and storm water under Individual NPDES Permit No. MI0059042.

Site Map: Please send a paper copy that is large enough to read.

Identification of Significant Materials: Table 1 is too small to read. Please send a larger version or a paper copy.

Nonstructural Controls:

Identify and address the seven nonstructural controls that must be included in your plan. See pages 18-22 of the Certified Operator Training Manual for Industrial Storm Water or Part 1, Section C.2.a-g of the Michigan General Permits for Storm Water Associated With Industrial Activity. Include the date that the proposed nonstructural controls will be implemented and the frequency in which the nonstructural controls will be performed.

1. **Preventative Maintenance:** In Appendix C, please modify the frequency of the routine inspection during activity to include weekly or within 24 hours of a storm event. For Item #1 on the inspection sheet, change it to read "Inspect discharge

from outfalls to determine if they are meeting water quality standards." Use the table on the comprehensive inspection form.

2. **Comprehensive Inspections:** In Appendix C, please modify the Comprehensive Inspection form:
 - a. Add review and evaluate routine inspection forms.
 - b. To the compliance statement: add to the last sentence "and NPDES Permit No. MI0059042.
3. **Good Housekeeping:** Since the inspection is done as part of the routine inspection that uses the form in Appendix C1 change the frequency during activity to include within 24 hours of a storm event.
4. **Material Handling:** This should include the proposed earth change activities that are to be conducted at the site. **The proposed SESC plan should be included here.** If the SESC plan is modified in the future a revised plan can be included in the updated SWPPP. (Describe the material handling that takes place at the facility. This should include the receiving, storage, and shipping of the significant materials at the facility. Handling of wastes should also be included.) Spill response is part of the material handling. Included in the spill response should be the department phone contact numbers. To Table 3: Add "Maintain controls in the SESC plan".
5. **Soil Erosion:** Straw or hay bales are not acceptable sedimentation control measures. Remove them from the plan and use alternative controls that are effective.
6. **Employee Training:** Adequately addressed.
7. **Significant Materials:** List the significant materials that are expected to be in the storm water runoff after the implementation of the other nonstructural controls. This would include fuels and soils that are being used to fill ponds or that could erode from exposed areas during construction activity.

Structural Controls: Include those controls that will be put in place as part of the SESC plan, the splash pads and pumps at the outfalls.
(Describe any structural controls that are used at the facility to prevent contamination of storm water or that are used to treat contaminated storm water.)

Annual Report: The permit requires that they be submitted by January 10 of each year.

Signatures: The signature page is adequate once it is signed.

Please note the facility needs to be operating under an approved Storm Water Pollution Prevention Plan to be in compliance with the Permit No MI0059042. Therefore we request that the changes be made as quickly as possible and that the SWPPP be implemented by November 13, 2012.

Please send a copy of the SWPPP by November 13, 2012 when the corrections and additions to the SWPPP have been made.

This Compliance Letter does not relieve the facility of any liability for past or continuing violations of NREPA, as amended. Please note that failure to respond to this Compliance Letter may result in escalated administrative or legal enforcement actions.

Please contact me if you have any questions regarding the SWPPP or other issues concerning the Michigan General Permits for Storm Water Associated With Industrial Activity.

Sincerely,

Keith Noble
Environmental Quality Analyst
Storm Water Program
Water Resources Division
989-894-6282

cc: Mr. John-eric Pardys, CRA, jpardys@CRAworld.com
Mr. Grant Trigger, RACER Trust, 2930 Ecorse Road, Ypsilanti, Michigan,
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Mr. Brian Rudolph, District Supervisor, Saginaw Bay District, DEQ, WRD, Bay City