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YPSILANTI COMMUNITY UTILITIES AUTHORITY

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

December 9, 2013

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

RE: Annual Compliance Inspection

Dear Ms. Landale:

The following letter is in regards to the annual compliance inspection and evaluation of the permitted site located at 2901 Tyler Road in the Township of Ypsilanti. The Ypsilanti Community Utilities Authority (YCUA) performed the site inspection of the site on October 4, 2013. The YCUA appreciates the time your staff spent to inspect and evaluate the site. I have enclosed the Annual Compliance Evaluation / Inspection Report for your review. Please be advised that there are no required actions in response to the annual inspection and evaluation.

Please contact me if you have any questions regarding this correspondence by phone at 734-484-4600 ext. 123 or by email at lblackburn@ycua.org.

Sincerely,

Luther Blackburn
Compliance Supervisor

Enclosure: Annual Compliance Evaluation / Inspection Report

Cc: Compliance Department File

RECEIVED
DEC 11 2013
CRA-DETROIT



Significant Industrial User Inspection / Evaluation

Date: 10/4/2013 Time: 9:30am Inspector(s): Luther Blackburn

Facility Representative(s) Present: Jeremy Degrande (EQ – Project Manager) and Dave Rivers (CRA)

Information confidential pursuant to 40 CFR 403.14: ☐ Yes ☒ No Inspection Scheduled: ☒ Yes ☐ No

Section A. General Information

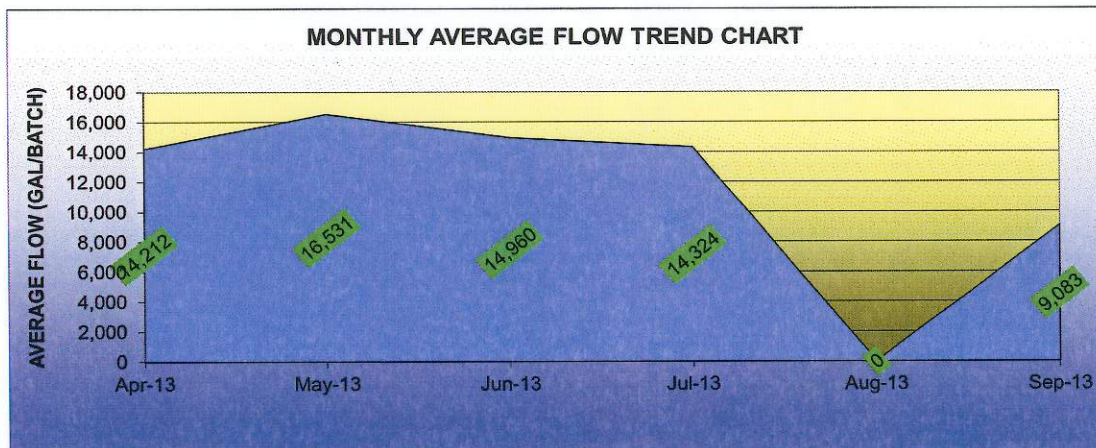
1. Facility Name: R.A.C.E.R. Trust – Company Vehicle Operations (CVO) Site
2. Parent Company / Affiliation: _____
3. Facility Location: 2901 Tyler Road
Ypsilanti, MI 48198
4. Facility Mailing Address: CRA - Plymouth Office
14496 Sheldon Road, Plymouth, MI 48170
5. Authorized Representative: Grant Trigger Position: Deputy Cleanup Manager-MI
Phone Number: 313-486-2908 Mobile: 313-670-6226
Email Address: gtrigger@racetrust.org
6. Facility Contact: Beth Landale Position: CRA Project Manager
Phone Number: 734-357-5528 Mobile: 734-545-5423
Email Address: blandale@croworld.com
7. Permit Number: RA# 12-15 Expiration Date: 12/31/2015 Date of Last Inspection: 10/17/2012

Section B. Operational Information

1. Description of business activity, products, or services: Remediation and redevelopment of former General Motors Corporation Property. Property Detail: a 22-acre parcel located southwest of the larger Willow Run Powertrain facility, the CVO is located on the banks of Tyler Pond and includes a paved parking area. The area is zoned commercial and an environmental remediation plan is being implemented to address historic environmental concerns.

2. Description of manufacturing or fabrication processes: None
- _____
- _____
- _____
3. Standard Industrial Classification (SIC) or North American Industry Classification System (NAICS) Code(s):
None identified
- _____
4. Number of employees: At minimum one during discharges. Schedule of Operation: As needed
- Hours/day: Variable depending on remediation activities. Days/week: 5-7
- Shifts/day: N/A Months/Year: System is typically shut down during winter months.
5. Water Supply: ☒ Municipal ☐ Well ☐ Other: _____
6. Environmental Permits:
- A. NPDES Permit: _____
- B. Air Permit: _____
- C. RCRA: ☒ Generator ☐ Storage > 90 Days ☐ Treatment
- Permit: MIK468293311
- D. DWSD Permit: _____
- E. Other: _____
7. Categorical User: ☐ Yes ☒ No
- If Applicable:
- A. Category: _____
- B. Subpart: _____
- _____
8. Wastewater Flow(s):
- A. Process: AVG - 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: Flow totalizer installed on discharge piping.
- 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
- I. Calibration: N/A
- J. Graph:



K. Comments: _____

Section C. Pretreatment Information

- Process generating wastewater: Typically groundwater has been collected from french drain located along a sheet pile wall on the south bank of Tyler Pond. The collected groundwater is then pumped into a 20,000-gallon equalization/batch tank.
In October 2013, the Environmental Quality Company (EQ) was contracted to begin excavation of the source material responsible for the groundwater contamination. EQ will be conditioning, excavating, and disposing of the impacted soils over a 3-month period. Conditioning will involve in-place mixing of oxidants and an activator in the excavation area. Decontamination water will be transferred to the 20,000 gallon equalization tank. Mr. DeGrande stated the decontamination water will be reused when possible but may have to be disposed of on occasion with collected groundwater. YCUA issued approval for discharge of groundwater from the excavation area in correspondence dated May 17, 2013.

2. Description of Pretreatment: Where dense non-aqueous phase liquid (DNAPL) is observed in the excavation, the water will be pumped through weir tanks to facilitate separation. DNAPL will be drained from the bottom of the tank into 55 gallon drums as needed. Water from the weir tanks is then pumped through a bag filter to a frac tank for storage of water pumped from the excavation. Sodium permanganate is added to the equalization tank to reduce concentrations of volatile organic compounds. Periodic testing of the water stored in the equalization tanks will be performed by an on-site lab. Groundwater will be pumped from the equalization/batch tank via a 2-inch transfer pump tank through a bag filtration unit equipped with 100-micron bag filters. Effluent from the bag filtration unit will then discharge to the YCUA sanitary sewer system.
3. Design flow for treatment system: Not identified
- A. Discharge Schedule: As needed
- B. Type of Discharge: ☐ Continuous ☐ Intermittent ☒ Batch
- If Applicable: Batch Volume ~16,000 gallons Discharge Frequency _____
4. Are all treatment units, other than back up units in service: Yes, permittee no longer uses carbon units because it appears they are not effective at reducing vinyl chloride concentrations at the site.
5. Is there a full-time qualified operator: ☒ Yes ☐ No
- If yes, what training has the operator been provided? Internal
- Does the operator possess licensing? No.
6. Are replacement parts available for critical components: ☒ Yes ☐ No
7. Are treatment chemicals readily available: ☒ Yes ☐ No ☐ N/A
8. Is there an operation and maintenance manual available to staff: Yes.
9. Is there a potential for a by-pass of the treatment system: ☐ Yes ☒ No
- If yes, explain? Pump located in french drain will not operate if equalization tank if full.

10. Is sludge generated due to the treatment process? ☐ Yes ☒ No

If yes:

Waste Characterization: _____

What is the method of disposal? _____

Section D. Storage Areas

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

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): Near excavation area and frac tank.

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): Permittee stores 55-gallon drums of DNAPL removed from
the remediation site in storage building north of property fenceline.

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 is 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 If no, omit the remaining questions in this section.

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

Comments: _____

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

If yes, describe: Permittee began expanded remediation activities in October 2013. EQ has been
contracted by the permittee to remove the source material responsible for the site contamination. Source
material will be treated on-site and disposed of as a non-hazardous waste.

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>
<input type="checkbox"/> Solvent	_____	<input checked="" type="checkbox"/> Waste Product	<u>Volume unknown</u>
<input type="checkbox"/> Used Oil	_____	<input type="checkbox"/> Grease	_____
<input type="checkbox"/> Plating Wastes	_____	<input type="checkbox"/> Treatment Sludge	_____
<input type="checkbox"/> Grease	_____	<input type="checkbox"/> Paints	_____
<input type="checkbox"/> Thinner	_____	<input type="checkbox"/> Organics	_____
<input type="checkbox"/> Pesticides	_____		
<input type="checkbox"/> Other:	_____		
_____	_____		
_____	_____		
_____	_____		

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

- 1) US Industrial Technologies, Inc. (Livonia, MI)
- 2) The Environmental Quality Company (Ypsilanti, MI)
- 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

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? Operational staff.

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

If no, please comment: _____

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

If no, please comment: _____

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

If yes, please describe: EQ will have an on-site laboratory to analyze VOCs during the expanded
remediation activities.

6. Who conducts the facility's permit required analyses? Test America Laboratories, Inc.

7. Is an appropriate QA/QC program in place for permit required analyses? Yes, a QA/QC summary report
accompanies all self-monitoring report submittals.

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:

- In October 2013, the Environmental Quality Company (EQ) was contracted to begin excavation of the source material responsible for the site's groundwater contamination. EQ will be conditioning, excavating, and disposing of the impacted soils over a 3-month period. Conditioning will involve in-place mixing of oxidants and an activator in the excavation area. Decontamination water will be transferred to the 20,000 gallon equalization tank.
- EQ will have an on-site laboratory to analyze VOCs and verify compliance with the vinyl chloride parameter during the expanded remediation activities.
- Mr. DeGrande stated the decontamination water will be reused when possible but may have to be disposed of on occasion with collected groundwater. YCUA issued approval for discharge of groundwater from the excavation area in correspondence dated May 17, 2013.
- Permittee no longer uses carbon units because it appears they are not effective at reducing vinyl chloride concentrations at the site. The addition of sodium permanganate has been successful at oxidizing vinyl chloride.
- CRA will be accessing the entrance gate just east of the former YCUA Willow Run Treatment Plant located on Airport Drive over the next couple of months. CRA has set up portable air monitors on the south side of the old treatment plant and will be accessing the gate during the week to check readings multiple times per day. The project contact is Daniel Beck and can be reached by phone at 906-367-6376. Mr. Beck has been informed that employees are prohibited from accessing the old plant and are to stay away from any of the tanks and old equipment on site. CRA has placed their lock in series with the other locks to the gate which we believe belongs to RACER Trust, Wayne County, and DTE.
- **Please be advised the YCUA has revised our standard industrial user permits. The permittee should expect to receive a new permit in the next 30 days. The new permit will have the same effective dates, monitoring requirements, and reporting periods. Changes in the new permit format will be explained in the permit cover letter.**

2. Recommendations / Required Actions:

- No actions required.

Completed by:

A handwritten signature in black ink, appearing to read 'L. Blackburn', written over a horizontal line.

Luther Blackburn
Compliance Supervisor
Date: December 9, 2013