

Practical Environmental Consultants, Inc. Website: www.pec-inc.com 1305 Remington Road - Suite A Schaumburg, Illinois 60173 Phone: 847.519.3430 Fax: 847.519.3431

June 30, 2016

Michigan Department of Environmental Quality - Air Quality Division Southeast Michigan District Office 27700 Donald Court Warren, Michigan 48092-2793 Attn: Mr. Sam Liveson

RECEIVED 05 2016 ÂЮ QUALITY DIVISION SEMI OFFICE

Re: Violation Notice Written Response Speedway LLC #8821 547 N. Perry Street Pontiac, Oakland County, Michigan 48342

Dear Mr. Liveson:

Practical Environmental Consultants, Inc. (PEC), on behalf of Speedway LLC (Speedway), has prepared this correspondence as a formal written response in accordance with the request contained in a Michigan Department of Environmental Quality (MDEQ) Violation Notice dated June 28, 2016.

From May 2, 2016 through June 1, 2016 a dual-phase extraction (DPE) remediation system was operated at the above referenced site to remediate a release of gasoline from a historic underground storage tank system at the direction of the MDEQ Remediation and Redevelopment Division. The DPE remediation system is equipped with soil vapor extraction and air stripping equipment which are eligible to be operated under an approved General Permit to Install.

On June 17, 2016 it was determined that the General Permit to Install application process had not been completed, and therefore the facility was in violation of Rule 201, Act 451. PEC contacted the MDEQ to provide verbal notice of this violation on June 17, 2016. On June 28, 2016 a Violation Notice was issued by the MDEQ due to operation of the equipment without an approved permit in place. The absence of an approved permit occurred due to an oversight to have the previously completed General Permit to Install application submitted to the MDEQ.

Mr. Sam Liveson Air Quality Engineer Violation Notice Written Response Speedway LLC #8821 June 29, 2016 Page 2

A General Permit to Install application was submitted to the MDEQ on June 29, 2016 in an effort to bring the facility into compliance with Rule 201. The remediation system has not been operated since June 1, 2016 and will not be restarted prior to the issuance of an approved General Permit to Install by the MDEQ.

If I can provide you with any additional information, please contact me at (616) 583-9850, extension 30.

Sincerely, Practical Environmental Consultants, Inc.

Michael K. Cox Geologist, Certified Wastewater Operator #W5713

Copy: Remediation File Store No. 8821 Jason Siemen, Speedway LLC