



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 4, 2014

Mr. Douglas Arnold
Alston and Bird LLP
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

Dear Mr. Arnold:

SUBJECT: Request for Mixing Zone-Based GSI Criteria
Electrolux-Belding Products, 100 East Main Street, Belding,
Ionia County, Michigan
Site ID #: 3400083

The following mixing zone based GSI criteria has been developed for the above facility:

Table 1. The concentration of vinyl chloride at the GSI per data provided from the October 1, 2014, mixing zone request memo. The acute and chronic (FCV) limits are those values which, if exceeded, will result in a violation of surface water quality standards at the GSI (FAV) or within the mixing zone of the receiving stream (chronic values). All values are expressed as ug/L.

Chemical Parameter	Concentration at the GSI	Acute limit (FAV)	Chronic limit (FCV)
Vinyl Chloride	590 ug/L	17,000	2,400

If authorization with this discharge is obtained, compliance with mixing zone-based GSI criteria which are shown as chronic limits above may be established by a statistical evaluation of the data, if the evaluation is part of a department-approved monitoring plan. Compliance with mixing zone-based GSI criteria that are shown as acute limits above must be demonstrated on a point-by-point basis. Where both chronic and acute GSI criteria have been developed, compliance with both must be demonstrated.

To obtain authorization of this discharge in compliance with mixing zone-based criteria the No Further Action Report shall include a request for authorization of the venting groundwater discharge that exceeds generic criteria. The No Further Action Report shall include monitoring information to determine whether the discharge of venting groundwater complies with the requirements of Part 31 of the Act and Rules promulgated under Part 31 of the Act. The information shall be submitted with a certification statement and the signature of an appropriate person. The certification statement shall state "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this request and all attachments thereto and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information."

As part of the Michigan Department of Environmental Quality's approval of the No Further Action Report the legally enforceable agreement will include specific language to address the authorization of the discharge.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul J. Knoerr", written in a cursive style.

Paul J. Knoerr
Environmental Quality Analyst
Grand Rapids District Office
Remediation and Redevelopment Division
616-356-0624

cc: Mr. Bradley Johnson, Golder Associates
Mr. David O'Donnell, MDEQ