



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 22, 2021

VIA E-MAIL

Mr. Steven Haws
Brose New Boston Inc.
23400 Bell Road
New Boston, Michigan 48164

Dear Mr. Haws:

SUBJECT: National Pollutant Discharge Elimination System (NPDES)
Storm Water Discharges Associated with Industrial Activity
Designated Name: Brose New Boston Inc.

On November 6, 2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Water Resources Division (WRD), issued a Violation Notice (VN-011208) to the Brose New Boston Inc. facility located at 23400 Bell Road in New Boston, Michigan to address the facility's compliance with federal and state storm water regulations. At the time of the inspection on October 14, 2020, the facility was operating under an expired No Exposure Certification (NEC) and was not meeting the NEC requirements due to potential exposure of industrial materials to stormwater. On December 7, 2020, the facility responded to the violation notice with proposed corrective actions to comply with the No Exposure Certification. Prior to department approval of the NEC and implementation of the corrective actions, the facility will need to ensure that the facility's storm water discharge meets Water Quality Standards and must complete the additional follow up items presented in this letter as part of the process for NEC approval.

Per- and Polyfluoroalkyl Substances

In 2020, EGLE, Surface Water Assessment Section (SWAS) conducted ambient stream monitoring in the Huron River and its associated tributaries. The monitoring was conducted due to the statewide, multi-agency effort to determine the levels of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in waters of the state. In August 2020, surface water samples were collected from Willow Metropark and Regan Drain. Results of the ambient stream monitoring performed by EGLE, SWAS staff indicate that Willow Metropark, and upstream in the Regan Drain, have elevated levels of PFAS, specifically perfluorooctane sulfonate (PFOS), the highest being 81.5 parts per trillion (ppt) in the Regan Drain and 32.5 ppt in the Washago Pond in Willow Metropark. Michigan has developed Rule 57, Water Quality Standards for both PFOS and perfluorooctanoic acid (PFOA). For PFOS, the Human Non-Cancer Value (HNV) is 12 ppt for those waters not used as a drinking water source.

Additional follow-up sampling occurred in August, October, and November 2020 to further identify potential sources of PFAS in the watershed. Of the samples collected from Regan Drain, six (6) samples exceeded water quality standards for PFOS. Based on these results, EGLE staff are assessing potential sources near Regan Drain that may have contributed to the elevated levels of PFAS in Regan Drain and Willow Metropark.

Required Action

In order for the facility to qualify for the No Exposure Certification, the facility will need to verify that Brose New Boston is not a contributing source of PFAS to the Regan Drain. EGLE is requesting that Brose New Boston conduct PFAS sampling at the storm water pond on the southeastern corner of the facility's property. The attached document provides the minimum list of required analytes that Brose New Boston must provide laboratory sample results for. Additionally, all sampling shall be performed in accordance with the sampling guidance provided on the Michigan PFAS Action Response Team webpage <https://www.michigan.gov/pfasresponse/>.

By **March 22, 2021**, Brose New Boston shall submit a response to this letter, via MiWaters. At a minimum the response shall include:

1. A schedule to collect a sample from the storm water pond in the southeastern corner of the facility's property.
2. Certification that sampling shall be performed in accordance with appropriate sampling procedures and that PFAS samples shall be analyzed using either ASTM D7979 or an isotope dilution method, sometimes referred to as Modified 537.

The WRD appreciates the facility's prompt attention to this matter. Should you require further information regarding this letter, or if you would like to arrange a meeting to discuss it, please contact me at 248-497-2244 or FaberM@Michigan.gov.

Sincerely,



Maya Faber
Environmental Quality Analyst
Warren District Office
Water Resources Division

Attachment: EGLE PFAS Minimum Laboratory Analytes List

cc: Ms. Melinda Steffler, District Supervisor, EGLE-WRD (electronic)
Ms. Autumn Blattert, Brose New Boston Inc. (electronic)