



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYHER  
DIRECTOR

September 28, 2018

Ms. Colleen Liddell  
Senior Environmental Engineer  
Ford Motor Company  
Fairlane Plaza North  
290 Town Center Drive, Suite 800  
Dearborn, Michigan 48126

Dear Ms. Liddell:

**SUBJECT:** Notice of Deficiency - Administrative Review, Hazardous Waste Management Facility Operating License Renewal Application; Ford River Raisin Warehouse; MID 005 057 005

The Department of Environmental Quality (DEQ), Waste Management and Radiological Protection Division (WMRPD), has performed a completeness review of the Hazardous Waste Management Facility Operating License Renewal Application (Renewal Application) received on June 16, 2017, pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Based on our review, we have determined that the Renewal Application is administratively incomplete. A list of the completeness deficiencies is enclosed.

A response to this letter, along with the revisions correcting the deficiencies, must be submitted by October 29, 2018. Please send the submittal to:

Mr. Allan B. Taylor, Manager  
Hazardous Waste Section  
Waste Management and Radiological Protection Division  
Department of Environmental Quality  
P.O. Box 30421  
Lansing, Michigan 48909-7741

Failure to submit a complete application is grounds for denial of the application pursuant to R 299.9518(2)(c) of the administrative rules promulgated pursuant to Part 111.

Please use the replacement page format when submitting the revisions. The pages should be three-hole punched and numbered correctly so that they can be placed directly into the existing binder. It is also helpful if the revision date is noted on the replacement pages.

Should you have any questions regarding this review, please contact me at 517-284-6577; matlockc2@michigan.gov; or DEQ, WMRPD, P. O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Christine Matlock  
Senior Environmental Engineer  
Hazardous Waste Section  
Waste Management and Radiological  
Protection Division

Enclosure

cc/enc: Mr. Allan B. Taylor, DEQ  
Ms. Virginia Himich, DEQ  
Ms. Tracy Kecskemeti, DEQ  
Mr. Jim Day, DEQ  
Mr. Joseph Rogers, DEQ  
Mr. Art Ostaszewski, DEQ  
Mr. Andrew Bertapelle, DEQ  
Mr. Nathan Erber, DEQ  
Operating License File

**ADMINISTRATIVE COMPLETENESS REVIEW NOTICE OF DEFICIENCY**

| <u>NUMBER</u> | <u>CATEGORY</u>     | <u>STATE RULES<br/>FEDERAL RULES</u>        | <u>LOCATION IN<br/>APPLICATION</u> | <u>COMMENT</u>  |
|---------------|---------------------|---|------------------------------------|---|
| 1             | CERTIFICATION       | 508(3)<br><br>270.11(d)                     | Section 1                          | Signature of owner is required.   |
| 2             | CERTIFICATION       | 508(3)<br><br>270.11(d)                     | Section 1                          | Signature of operator is required.  |
| 3             | CERTIFICATION       | 508(3)<br><br>270.11(d)                     | Section 1                          | Signature of land titleholder is required.  |
| 4             | CONTINGENCY<br>PLAN | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(7) | A7                                 | The application must include a Contingency Plan.  |
| 5             | CONTINGENCY<br>PLAN | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(7) | A7                                 | The contingency plan must describe the actions of personnel to comply with 264.51 and 264.56. |

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|---------------|------------------------------|---|------------------------------------|---|
| 6             | CONTINGENCY<br>PLAN          | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(7) | A7                                 | The contingency plan must describe arrangements with local authorities and emergency response teams per 264.37.   |
| 7             | CONTINGENCY<br>PLAN          | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(7) | A7                                 | The contingency plan must list the names, addresses, and phone numbers of all emergency coordinators.   |
| 8             | CONTINGENCY<br>PLAN          | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(7) | A7                                 | The contingency plan must describe all emergency and decontamination equipment, including their location and capabilities.  |
| 9             | CONTINGENCY<br>PLAN          | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(7) | A7                                 | The contingency plan must include an evacuation plan for personnel, evacuation signals, and routes.   |
| 10            | PREPAREDNESS<br>& PREVENTION | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(6) | A6                                 | The preparedness and prevention section must include an adequate justification for each element of the Subpart C preparedness and prevention requirements for which the waiver request is intended. Those elements of the preparedness and prevention requirements which are not explicitly waived must be included in the application. |

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|---------------|------------------------------|--|------------------------------------|---|
| 11            | PREPAREDNESS<br>& PREVENTION | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(8)(i)   | A6                                 | The preparedness and prevention section must include a description of any measures to prevent hazards in unloading operations.                  |
| 12            | PREPAREDNESS<br>& PREVENTION | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(8)(ii)  | A6                                 | The preparedness and prevention section must include a description of any measures to prevent runoff and flooding.                              |
| 13            | PREPAREDNESS<br>& PREVENTION | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(8)(iii) | A6                                 | The preparedness and prevention section must include a description of any measures to prevent contamination of water supplies.                  |
| 14            | PREPAREDNESS<br>& PREVENTION | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(8)(iv)  | A6                                 | The preparedness and prevention section must include a description of any measures to mitigate effects of equipment failures and power outages. |
| 15            | PREPAREDNESS<br>& PREVENTION | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(8)(v)   | A6                                 | The preparedness and prevention section must include a description of any measures to prevent undue exposure of personnel to hazardous waste.   |

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|---------------|------------------------------|--|------------------------------------|---|
| 16            | PREPAREDNESS<br>& PREVENTION | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(8)(vi)            | A6                                 | The preparedness and prevention section must include a description of any measures to prevent releases to the atmosphere.                 |
| 17            | LOCATION                     | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(11)(i)<br>-(ii)   | A9                                 | The application must discuss seismic standard considerations.   |
| 18            | LOCATION                     | 504(1)(c),<br>508(1)(b)<br><br>270.14(b)(11)(iii)<br>-(iv) | A9                                 | The application must discuss 100-year floodplain considerations.  |
| 19            | ENGINEERING                  | 504(1)(g),<br>508(1)(b)                                    |                                    | The application must include engineering plans, which must be prepared and sealed by a registered Professional Engineer.                  |
| 20            | ENGINEERING                  | 504(1)(g)(i),<br>508(1)(b)                                 |                                    | The application must include engineering plans, including plan views, elevations, sections, and supplementary views necessary for review. |

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|---------------|-----------------|--|------------------------------------|--|
| 21            | ENGINEERING     | 504(1)(g)(ii),<br>508(1)(b)                |                                    | The application must include specifications of all construction materials and installation methods used.   |
| 22            | ENGINEERING     | 504(1)(g)(iii),<br>508(1)(b)               |                                    | The application must discuss the basis of design for any process equipment and containment structures.   |
| 23            | ENGINEERING     | 504(1)(g)(iv),<br>508(1)(b)                |                                    | The application must include engineering specifications, including a process flow diagram.   |
| 24            | LANDFILLS       | 504(8)(a),<br>508(1)(b)<br><br>270.21(a)   | C1                                 | Attachment C1 (Landfills) of the application, must include a list of hazardous wastes placed in the containment units.   |
| 25            | LANDFILLS       | 504(8)(a-c),<br>508(1)(b)<br><br>270.21(b) | C1                                 | Attachment C1 (Landfills) must include detailed plans and engineering reports describing how the landfill is designed, operated, and maintained to meet the requirements of 264.19, 264.301, 264.302 and 264.303. Else, this section must include references to application sections where this information is provided. |

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|---------------|-----------------|--|------------------------------------|---|
| 26            | LINER           | 504(8)(a),<br>508(1)(b)<br><br>270.21(b)(1)(i) |                                    | The application must include a description of the containment unit liners, including drawings and specifications. |