



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

August 9, 2021

VIA E-MAIL AND CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Chuck Pinter  
Senior Environmental Engineer  
Ford Motor Company  
Fairlane Plaza North  
290 Town Center Drive, Suite 800  
Dearborn, Michigan 48126

Dear Mr. Pinter:

SUBJECT: Technical Notice of Deficiency, *Hazardous Waste Management Facility Operating License Renewal Application*; Ford River Raisin Warehouse; Monroe, Michigan; MID 005 057 005; Waste Data System Number 393036

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD), has performed a technical review of the *Hazardous Waste Management Facility Operating License Renewal Application* dated May 2017, and subsequent revisions (Renewal Application), pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the administrative rules.

Based on this review, EGLE has determined that the Renewal Application is technically inadequate. A list of technical deficiencies follows.

1. Section 1: Please update the form to include current information.
2. Section 1: Please remove the F006 waste code located in Section XIII.
3. Section 3: Please revise the form to be current, and consistent with Form EQP 5111.
4. Section 3: Provide the latitude/longitude with the facility address.
5. Section 3: The owner, operator, and land titleholder need to sign the form.
6. Attachment I: Please provide current copies of the permits. Specifically, the Industrial/Non-Domestic User Discharge Permits (Permit Numbers 1030, and 1030-1).
7. Attachment A2: Please clarify in Section A2.A.1 that even though F006 is generated onsite, it is stored in tanks for less than 90 days, so it is subject to generator rules.

8. Attachment A4: This section refers to the figure in Attachment III depicting the current security measures. However, they do not appear to be included in the figure. Please update the figure to accurately show the current security measures.
9. Attachment A5: Please include the inspection logs in this attachment or refer to their location.
10. Attachment A5: 40 CFR 264.15(b)(1) requires "The owner or operator must develop and follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) that are important to preventing, detecting, or responding to environmental or human health hazards." Please include the inspection program for inspecting safety and emergency equipment.
11. Attachment A6: Please clarify that groundwater is also protected along with air, soil, and surface water.
12. Attachment A7: Please revise the Contingency Plan to include the Pollution Emergency Alerting System (PEAS) Hotline as the point of contact, in case of an emergency. Also please replace MDEQ-WHMD with EGLE, MMD.
13. Attachment A7: Please revise the Contingency Plan to comply with 40 CFR 264.52 (e) and (f).
14. Attachment A7: Please attach the Emergency Response Plan that is mentioned in Section 3 of the Contingency Plan, if it is not already included. Also, please provide the Evacuation Plan.
15. Attachment A10: Please state that employees and contractors will be trained in the contingency and emergency response plans. Please describe how that training will be performed and recorded.
16. Attachment A11: Post Closure Groundwater Sampling and Analysis Plan (GW SAP): Please amend the GW SAP to indicate an Electronic Data Deliverable (EDD) will be submitted with the reports of all sampling in the United States Environmental Protection Agency, Region 5, EDD format and valid values reference.
17. Attachment A11: GW SAP: Please amend the GW SAP to include a map of statistical exceedances and detected concentrations included with reports.
18. Attachment B3: Please provide an updated list of all domestic, municipal, industrial, oil and gas wells, and soil borings within one mile of the site in all directions. If copies of logs are available, they should be provided. The list provided in the hydrogeological report appears to be out of date.
19. Attachment B3: Please provide the topographic maps that meet the criteria of R299.9506 (1) (e) and (f).

20. Attachment B3 – Section B3.C.1: If alternate information is being used to justify the Groundwater Monitoring Program, then it needs to be included.
21. Attachment B6: Please provide the most current drawings.
22. Please update the necessary attachments with the information within the Ford Monroe Plant (MID 005 057 005) – Proposed License Updates submitted to EGLE in an e-mail dated June 7, 2021.

A response to this letter, along with the revisions correcting the deficiencies, must be submitted in electronic format and hardcopy within 30 days of receipt of this letter.

When submitting the hardcopy version, please use the replacement page format, with the revision number and date in the footer of each page. Pages should be three-hole punched and numbered to be placed into existing binders.

Submit four copies of revisions to EGLE's Lansing office:

Ms. Christine Matlock, Senior Environmental Engineer  
Hazardous Waste Section – 4S  
EGLE, MMD  
P.O. Box 30421  
Lansing, Michigan 48909-7741

When submitting the electronic version, please make each file less than 10 MB, as EGLE's e-mail system cannot receive larger files.

Should you have any questions regarding this review, please contact me at 517-290-4612; MatlockC2@Michigan.gov; or EGLE, MMD, P. O. Box 30241, Lansing, Michigan 48909-7741.

Sincerely,



Christine Matlock  
Senior Environmental Engineer  
Hazardous Waste Section  
Materials Management Division  
517-290-4612

cc: Mr. Dave Canfield, Project Manager, GHD  
Ms. Kimberly Tyson, EGLE  
Mr. Dale Bridgford, EGLE  
Mr. Art Ostaszewski, EGLE  
Ms. Jill Coulter, EGLE  
Mr. Nathan Erber, EGLE  
Operating License File