

26850 Haggerty Road,
Farmington Hills, Michigan 48331
United States
www.ghd.com



Our ref: 11224408

October 27, 2021

Ms. Christine Matlock
Senior Environmental Engineer
Michigan Department of Environment, Great Lakes & Energy
Materials Management Division
Hazardous Waste Section – 4S
P.O. Box 30421
Lansing, Michigan 48909-7741

Response to 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 393036

Dear Ms. Matlock:

GHD Services Inc. (GHD) has prepared this letter on behalf of Ford Motor Company to provide responses to EGLE's August 9, 2021 Technical Notice of Deficiency, Hazardous Waste Management Facility Operative License Renewal Application. Our responses to the specific deficiencies are noted below.

EGLE Technical Deficiency #1

Section 1: Please update the form to include current information

GHD Response #1

EQP 5111 has been updated and is attached to this letter.

EGLE Technical Deficiency #2

Section 1: Please remove the F006 waste code located in Section XIII.

GHD Response #2

The F006 waste code has been removed from Section XIII of the attached EQP 5111.

EGLE Technical Deficiency #3

Section 3: Please revise the form to be current, and consistent with Form EQP 5111.

GHD Response #3

Form 8700-23 has been updated and is included in Section III.

This document is in draft form. The contents, including any opinions, conclusions or recommendations contained in, or which may be implied from, this draft document must not be relied upon. GHD reserves the right, at any time, without notice, to modify or retract any part or all of the draft document. To the maximum extent permitted by law, GHD disclaims any responsibility or liability arising from or in connection with this draft document.

EGLE Technical Deficiency #4

Section 3: Provide the latitude/longitude with the facility address.

GHD Response #4

The latitude and longitude of the facility has been added to the address in the Site Location Information Section of the Section III EPA Part A Permit Application.

EGLE Technical Deficiency #5

Section 3: The owner, operator, and land titleholder need to sign the form.

GHD Response #5

Owner signature is provided on the EQP 5111 and EPA RCRA Subtitle C Site Identification Form provided in Section 3. The owner and operator are both Ford Motor Company therefore only one signature was provided.

EGLE Technical Deficiency #6

Attachment I: Please provide current copies of the permits. Specifically, the Industrial/Non-Domestic User Discharge Permits (Permit Numbers 1030 and 1030-1).

GHD Response #6

The Monroe Industrial/Non-Domestic User Discharge permits 1030 and 1030-1 were previously included in Attachment 1 – Copies of Existing Environmental Permits (pages 132 through 152). The Permits have been included in this submittal, Attachment 1 – Copies of Existing Environmental Permits.

EGLE Technical Deficiency #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.

GHD Response #7

There is no F006 waste generated or stored at the Site. Attachment A2 – Chemical and Physical Analysis has been updated to reflect this.

EGLE Technical Deficiency #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.

GHD Response #8

The Site Plan submitted in Attachment A4 has been updated to show the Site security measures.

EGLE Technical Deficiency #9

Attachment A5: Please include the inspection logs in this attachment or refer to their location.

GHD Response #9

Completed inspection logs are maintained at the Site and are available during on-Site inspections. Attachment A5 has been updated to reflect this (A5.C).

EGLE Technical Deficiency #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.

GHD Response #10

Attachment A7 has been updated to include emergency equipment related to the Containment Units and frequency of their inspection. Attachment A6 indicates emergency equipment for fire control, automatic sprinklers, fire extinguishers, etc. are not necessary for the containment units since the waste within them is not flammable. However, internal communications system on each leachate manhole indicates the landfill leachate system status. Cellular phones are used in cases of emergency and arrangements between the Site and the City of Monroe Police Department and Fire Department have been made and are included in the Site's Emergency Response Plan (Attachment A7.1)

EGLE Technical Deficiency #11

Attachment A6: Please clarify that groundwater is also protected along with air, soil, and surface water.

GHD Response #11

Attachment A6 has been updated to clarify that groundwater is also protected.

EGLE Technical Deficiency #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.

GHD Response #12

Section 2.3 of the Contingency Plan contains the emergency contact list which includes the PEAS Hotline. MDEQ-WHMD references have been updated to EGLE-MMD.

EGLE Technical Deficiency #13

Attachment A7: Please revise the Contingency Plan to comply with 40 CFR 264.52 (e) and (f).

GHD Response #13

The Contingency Plan has been updated to comply with 40 CFR 264.52 (e) and (f). Specifically, Sections 2.5 (Emergency Equipment) and 3 (Evacuation Plan) have been included/updated. Additionally, the Ford Emergency Response Plan prepared for the Site has been included as an Attachment to the Contingency Plan.

EGLE Technical Deficiency #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.

GHD Response #14

The Ford Motor Company Emergency Response Plan that has been developed specifically for the Ford River Raisin Warehouse Site is included in Attachment A7. The evacuation plan is Section 3.5 of the Emergency Response Plan.

EGLE Technical Deficiency #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.

GHD Response #15

Ford maintains their documentation at the Site that training has been given to and completed by each employee.

EGLE Technical Deficiency #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.

GHD Response #16

The Post-Closure Ground Water Sampling and Analysis Plan has been updated to reflect this, specifically Section 10.

EGLE Technical Deficiency #17

Attachment A11: GW SAP: Please amend the GW SAP to include a map of statistical exceedances and detected concentrations included with reports.

GHD Response #17

The Post-Closure Ground Water Sampling and Analysis Plan has been updated to reflect this, specifically Section 10.

EGLE Technical Deficiency #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.

GHD Response #18

A map with the location of the Site and a 1-mile radius around the Site is included in Attachment B3.1. The Ford River Raisin Warehouse Site is located in Monroe County, Township 7S, Range 9E, Section 10. The Sections that are within a mile radius of the Site include Section 2, 3, 9, 10, 11 and 14. The following databases were searched within a 1-mile radius of the Site for the presence of wells and/or for assessing available well logs in the area:

- EGLE Scanned Water Well Record Retrieval System (<https://www.egle.state.mi.us/well-logs/>);
 - Records exist for Sections 5, 6, 7, 8, 12, 17, 23 and 29 (all of these Sections are greater than 1 mile away from the Site)
 - No water well records exist for Sections 2, 3, 9, 10, 11 or 14
- EGLE Water Well Viewer Website (<https://www.mcgi.state.mi.us/waterwellviewer/>);
 - 1 record located within 1 mile of the Site – Wellogic ID 58000004293 located at Front Street, Monroe (well record included in Attachment B3.1)
- EGLE Wellogic System (www.egle.state.mi.us/wellogic):
 - Records exist for Sections 1, 4, 6, 8, 10, 17, 16, 17, 18, 19, 20, 24, 29, 30
 - The records for Section 10:
 - Address 15005 Hull Road, which is located approximately 4 miles southwest of the Site; and
 - Address 15214 S. Dixie Hwy, which is located approximately 4.5 miles southwest of the Site.
 - No well logs exist for sections 2, 3, 9, 11 or 14

EGLE Technical Deficiency #19

Attachment B3: Please provide the topographic maps that meet the criteria of R299.9506 (1) (e) and (f).

GHD Response #19

A topographic map showing the containment units, property boundary, and groundwater monitoring locations has been included in Attachment B3.

EGLE Technical Deficiency #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.

GHD Response #20

Based on B5.A.2 which says Groundwater Monitoring Program Waiver is NA and B5.A.3 which indicates the Hydrogeologic Report was prepared in accordance with R299.9506, it seems the “alternate information” box was checked in error, Attachment B3 – Section B3.C.1 has been revised to check the “waiver is requested for R299.9506(2) box.

EGLE Technical Deficiency #21

Attachment B6: Please provide the most current drawings.

GHD Response #21

Attachment B6 are the Final As-Built Drawings of the Eastern and Western Containment Units included in the Closure Certification Report dated October 1999 prepared by Midwest Environmental Consultants, Inc. of Michigan. As these drawings were the final as-builts, they were not/have not been updated. A final cover survey was completed in 2017 and has been included in Attachment B6 for reference.

EGLE Technical Deficiency #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.

GHD Response #22

GHD Comments in their June 7, 2021 email:

Update to License, Part II, section H, 7 – Form Modification:

- GHD intends on using the attached “Low-Flow Purging” record, which differs from the form previously used by Mannik and Smith. Additionally, GHD has implemented the use of digital forms whereas the collection of data from Site inspections, hydraulic monitoring and groundwater monitoring is input directly into iPads and then can be exported into the Site database in real time.

Response: The modifications that GHD had proposed have been incorporated in the updated/revised Post-Closure Groundwater Sampling and Analysis Plan.

Update to Attachment 5 – Postclosure Groundwater Sampling and Analysis Plan:

- A4.2 and A4.3 - GHD would like to propose using low-flow sampling for all parameters during groundwater samples versus disposable bailers.

Response: The Post-Closure Groundwater Sampling and Analysis Plan (SAP) (Attachment A11) has been updated, specifically in Section 4, to reflect the implementation of low-flow groundwater sampling procedures at the Site.

Update to Attachment 3 – Postclosure Plan:

- Site contact is Sean Townsend, 734-244-1340. Replacing Mr. R.A. Milz in the license

Response: Mr. Townsend's contact information for the Site has been provided in the Site Contingency Plan and associated Emergency Response Plan (Attachment A7).

Regards



David Canfield, P.E.
Project Manager

+1 248 893 3414
David.canfield@ghd.com

Copy to: Chuck Pinter, Ford EQO
Kristen Aspinall, GHD



Hazardous Waste Landfill Operating License Permit Application Renewal Ford River Raisin Warehouse

Ford Motor Company

October 26, 2021



GHD 11224408-03

26850 Haggerty Road,

Farmington Hills, Michigan 48331, United States

T +1 248 893 3400 | F +1 248 893 3454 | E info-northamerica@ghd.com | ghd.com

Document status

Status Code	Revision	Author	Reviewer		Approved for issue		
			Name	Signature	Name	Signature	Date
S1	00	K. Aspinall	D. Canfield		N. Kuhl		10/26/21
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[Status code]							
[Status code]							
[Status code]							

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Section I

EGL E Application Form EQP 5111



Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division

**OPERATING LICENSE APPLICATION FORM FOR
HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES**

Required under authority of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Failure to submit this information may result in civil or criminal penalties.

Note: Copies of the current EGLE Site Identification Form, EQP 5150, and the EPA Part A Permit Application Form, 8700-23, must be submitted with this application.

I. FACILITY SITE ID NUMBER		005057005						
II. FACILITY'S LEGAL OWNER								
A. Name	Ford Motor Company							
B. Street or P.O. Box	3200 East Elm Avenue							
C. City/State/ZIP	Monroe, Michigan 48162							
D. Telephone Number (area code included)	734-243-4859							
E. Owner Type	P	F. Ownership Change?	Y	X	N	N/A	Date	10/2009
III. FACILITY OPERATOR								
A. Name	Ford Motor Company							
B. Street or P.O. Box	3200 East Elm Avenue							
C. City/State/ZIP	Monroe, Michigan 48162							
D. Telephone Number (area code included)	734-243-4859							
E. Operator Type	P	F. Operator Change?	Y	X	N	N/A	Date	10/2009
IV. TITLEHOLDER OF LAND								
A. Name	Ford Motor Company							
B. Street or P.O. Box	3200 East Elm Avenue							
C. City/State/ZIP	Monroe, Michigan 48162							
D. Telephone Number (area coded included)	734-243-4859							

V. OPERATING LICENSE APPLICATION								
Place an "X" in the appropriate box under either A or B (select only one box)								
A. Operating License Application								
<input type="checkbox"/>	First Application for *Existing Facility	Place an "X" here if application is for a facility that has not been previously licensed in Michigan to treat, store, or dispose of hazardous waste and has interim status pursuant to 40 CFR §270.70.						
<input checked="" type="checkbox"/>	Renewal Application for *Existing Facility	Place an "X" here if renewal application for a facility that was previously licensed in Michigan to treat, store, or dispose hazardous waste and whose hazardous waste operations have not had any new construction or been altered, enlarged, or expanded.						
<input type="checkbox"/>	Application for Modification of License	Place an "X" here if application is for a license modification.						
<input type="checkbox"/>	First Application for Research, Development, and Demonstration (RDD) License	Place an "X" here if application for a temporary license for RDD.						
<input type="checkbox"/>	Renewal Application for RDD License	Place an "X" here if application for the renewal of a temporary license for RDD.						
B. Operating License Application for New, Altered, Enlarged, or Expanded Facility								
<input type="checkbox"/>	First Application	Place an "X" here if application is for a new facility or a facility that wishes to alter, enlarge, or expand its hazardous waste operations.						
For existing facilities, provide date operation began.							Date	3/27/1995
For RDD activities, provide the date RDD began or expected to begin.							Date	NA
For new, altered, enlarged, or expanded facilities, provide date expected construction to begin.							Date	NA

***Existing Facility** means a hazardous waste treatment, storage, or disposal facility (TSDF) that either received all necessary state-issued environmental permits or licenses before January 1, 1980, or for which approval of construction was received from the Air Pollution Control Commission before November 19, 1980, or before promulgation of new federal rules that caused the facility to become subject to regulation as a TSDF. Existing facilities also include TSDFs that were operating before January 1, 1980, under existing authority, or before promulgation of new federal rules that caused the facility to become subject to regulation as a TSDF and that did not require state-issued environmental permits or licenses.

VI. OPERATING LICENSE APPLICATION FEES			
<input checked="" type="checkbox"/>	A. Operating License Application Fixed Fee		\$ 500
<input type="checkbox"/>	B. Additional License Application Fees for New, Altered, Enlarged, or Expanded Facility		\$ 25,000
Check Type of Facility			
<input type="checkbox"/>	Land Disposal (\$9,000)		\$ _____
<input type="checkbox"/>	Incineration or Other Treatment (\$7,200)		\$ _____
<input type="checkbox"/>	Storage (\$500)		\$ _____
Total Operating License Fee			\$ _____
<p>Note: Checks shall be made payable to the "State of Michigan" and the state accounting code "HWOL" written in the memo portion. Checks shall be mailed to EGLE, Cashier's Office, P.O. Box 30657, Lansing, Michigan 48909-8157, with a copy of payment included with application that is mailed to the EGLE, MMD, P.O. Box 30241, Lansing, Michigan 48909-7741.</p>			

VII. EXISTING ENVIRONMENTAL PERMITS (attach copies of each as proof of issuance)	
<input type="checkbox"/>	A. NPDES (Discharges to Surface Water) Permit Number
<input type="checkbox"/>	B. UIC (Underground Injection of Fluids) Permit Number
<input checked="" type="checkbox"/>	C. RCRA (Hazardous Waste) Permit Number MID005057005
<input type="checkbox"/>	D. PSD (Air Emissions From Proposed Sources) Permit Number
<input checked="" type="checkbox"/>	E. Other (Specify below) Permit Number City of Monroe Discharge Permit Nos.: 1030 and 1030-1 (Attachment 1)

VIII. NATURE OF BUSINESS (Provide a brief description)	
Ford Motor Company Warehouse. Former Automotive Components Holdings, LLC automotive chassis plant. Former Visteon automotive chassis plant. Former Ford metal stamping and former electroplating operation.	
(see other required attachment #, General Facility Description for more detailed information)	

IX. MAP	
Attach to this application is a topographic map of the area extending at least one mile beyond the property boundaries. The map must show the legal boundaries of the facility; the location of each of its existing and proposed intake and discharge structures; each of its hazardous waste treatment, storage, or disposal facilities, including the location of all processes listed in Items XII and XIII identified by process code; and each well where it injects fluids underground. Include all springs, rivers, and other surface water bodies in the map area, plus all drinking water wells within a quarter mile of the facility that are identified in the public record or otherwise known to you. (see instructions for specific requirements)	

X. FACILITY DRAWING	
All existing facilities must include a scale drawing of the facility showing the property boundaries of the facility; the areas occupied by treatment, storage, or disposal operations that will be used during interim status; the name of each operation (drum storage area, etc.); areas of past TSD operations; areas of future TSD; and the approximate dimensions of the property boundaries and all TSD areas. Where applicable, use the process codes listed in Items XII and XIII to indicate the location of all TSD. This drawing should fit on an 8.5 by 11 inch sheet of paper.	

XI. PHOTOGRAPHS	
All existing facilities must include photographs that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. Use the process codes and descriptions in Items XII and XIII to indicate the location of all TSD areas. Indicate the date of the photograph on the back of each photograph. Photographs may be in color or black and white, aerial or ground-level.	

XII. PROCESS CODES AND DESIGN CAPACITIES (see instructions)									
Line Number	A. Process Code (from list)	B. Process Design Capacity			Line Number	A. Process Code (from list)	B. Process Design Capacity		
		B.1. Quantity	B.2. Unit of Measure	For Official Use Only			B.1. Quantity	B.2. Unit of Measure	For Official Use Only
1.	D80	873	A		6.				
2.					7.				
3.					8.				
4.					9.				
5.					10.				

C. Additional Process Codes or Description of Nonlisted Processes (Codes "S99" and "T04").
 NA

XIII. DESCRIPTION OF HAZARDOUS WASTES								
Line Number	A. Hazardous Waste Number (enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (enter code)	D. Processes				
				D.1 Process Codes (enter code)				D.2 Process Description (if no code entered in D.1)

XIV. OTHER REQUIRED ATTACHMENTS

- A. General Information (each item should be a separate attachment to the application)**
- | | | |
|--------------------------------------|---------------------------------------|--|
| 1. General facility description | 6. Preparedness/prevention or waiver* | 11. Closure and Postclosure (C/PC) Plan* |
| 2. Chemical and physical analyses* | 7. Contingency Plan* | 12. C/PC cost estimates* |
| 3. Waste Analysis Plan* | 8. Traffic information | 13. Topographic map |
| 4. Security procedures and equipment | 9. Location information | 14. Liability mechanism |
| 5. Inspection schedules* | 10. Personnel training program* | 15. Financial assurance instrument |
- * Use template provided to complete application

- B. Supplemental Information (each item, if needed, should be a separate attachment to the application)**
- | | |
|---|--|
| 1. Status of compliance with other federal laws | 6. Engineering plans |
| 2. Corrective action information* | 7. Proof of issuance of other permits or licenses |
| 3. Hydrogeological Report* | 8. Capability certification/compliance schedule |
| 4. Environmental Assessment* | 9. Restrictive covenant (landfills only) |
| 5. Environmental monitoring Programs* | 10. Construction certification (new, altered, enlarged, or expanded) |
- * Use template provided to complete application

- C. Facility Specific Information (each item, if needed, should be a separate attachment to the application)**
- | | |
|--------------------------------------|--|
| 1. Containers* | 8. Land treatment |
| 2. Tanks* | 9. Miscellaneous units |
| 3. Incineration or thermal treatment | 10. Underground mines or caves |
| 4. Treatment | 11. Drip pads |
| 5. Surface impoundments | 12. Boilers and industrial furnaces |
| 6. Waste piles | 13. Air emissions from process vents, equipment leaks, tanks, containers, and surface impoundments** |
| 7. Landfills | |
- * Use template provided to complete application
- ** Use templates C.11-AA, C.11-BB, and C.11-CC provided to complete application

XV. CERTIFICATION		
<p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>		
<p>Andrew S. Hobbs, Director, Environmental Quality Office Ford Motor Company</p>	<p>DocuSigned by: <i>Andy Hobbs</i></p>	<p>oct-26-2021</p>
OWNER NAME (type or print)	SIGNATURE	DATE SIGNED
OPERATOR NAME (type or print)	SIGNATURE	DATE SIGNED
TITLEHOLDER OF LAND NAME (type or print)	SIGNATURE	DATE SIGNED

Section II

EGLE Site Identification Form EQP

5150



SITE IDENTIFICATION FORM

You must save this file to your computer before completing the form

Required under authority of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.
Failure to submit this information may result in civil or criminal penalties.

Clear Form

1. Reason for Submittal (Select only one)

<input type="checkbox"/>	Obtaining an initial United States Environmental Protection Agency (EPA) Identification (ID) number, as a new site or new owner, for an on-going regulated activity that will continue for a period of time. 1. Pay the \$50 fee on-line using a MasterCard, VISA, or Discover Card at https://www.thepayplace.com/mi/deq/siteid (fees do not apply to LIB only sites). 2. E-mail this form , with a copy of the fee receipt, to EGLE-MMD-Site-ID-Reporting@Michigan.gov ; •or Mail the form with a check made payable to the State of Michigan to: Michigan Department of Environment, Great Lakes, and Energy (EGLE), Cashier's Office – HWUC, P.O. Box 30657, Lansing, Michigan 48909-7741.
<input checked="" type="checkbox"/>	Submitting a subsequent notification to change, update, or verify site information for an existing owner of a site with a previously issued Site ID number. E-mail to EGLE-MMD-Site-ID-Reporting@Michigan.gov ; or mail to EGLE, Materials Management Division (MMD), Management and Tracking Unit, P.O. Box 30241, Lansing, Michigan 48909-7741.
<input type="checkbox"/>	* NOTIFYING THAT Site is still in business and that regulated activity is no longer occurring at this site (end date required) _____ STILL IN BUSINESS AND NO LONGER GENERATING WASTE Authorized Signature _____ Date _____ <i>*Mail completed pages 1 and 2 to EGLE, MMD, PO Box 30241, Lansing, MI 48909-7741</i>
<input type="checkbox"/>	*NOTIFYING THAT Site is no longer in business and that regulated activity is no longer occurring at this site (end date required) _____ SITE IS OUT OF BUSINESS AND NO LONGER GENERATING WASTE Authorized Signature _____ Date _____ <i>*Mail completed pages 1 and 2 to EGLE, MMD, PO Box 30241, Lansing, MI 48909-7741</i>
<input type="checkbox"/>	Site was a TSD facility and/or generator of less than 1,000 kilograms (kg) of hazardous waste, less than 1 kg of acute hazardous waste, or 100 kg of acute hazardous waste spill cleanup in one or more months of the reporting year.
<input type="checkbox"/>	Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities.
<input type="checkbox"/>	Submitting a new or revised Part A Form.
<input type="checkbox"/>	Submitting as a component of the Hazardous Waste Biennial Report.

2. Site EPA ID Number

M	I	D	0	0	5	0	5	7	0	0	5
---	---	---	---	---	---	---	---	---	---	---	---

3. Site Legal Name

Ford Motor River Raisin Warehouse

4. Site Specific Name

Ford River Raisin Warehouse

5. Site Location Address

Street Address 3200 E Elm Aveune		
City, Town, or Village Monroe	County Monroe	
State Michigan	Country USA	Zip Code 48162

6. Site Mailing Address

Same as Location Address

Street Address 290 Town Center Drive, Suite 800		
City, Town, or Village Dearborn	County Wayne	
State Michigan	Country USA	Zip Code 48126

Site ID # M I D 0 0 5 0 5 7 0

7. Federal Tax ID # (required)

38XXXXX90

8. Site Land Type (check one)

Private <input checked="" type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Tribal <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input type="checkbox"/>	Other <input type="checkbox"/>
--	------------------------------------	--------------------------------------	-------------------------------------	------------------------------------	---------------------------------------	-----------------------------------	-----------------------------------

9. North American Industry Classification System (NAICS) Code(s) for the Site at least one 6-digit code REQUIRED

A 493190	B
C	D

10. Site Contact Information Same as Location Address

Full Name (Company or Individual as applicable) Chuck Pinter		
Title Senior Environmental Engineer		
Street Address 290 Town Center Drive, Suite 800		
City, Town or Village Dearborn		
State Michigan	Country USA	Zip Code 48126
Email cpinter@ford.com		
Phone 734-260-0928	Ext	Fax

11. Name of Site's Legal Owner Same as Site Mailing Address

Approximate date became owner 10/01/2009 Approximate date ceased as owner _____

Full Name (Company or Individual as applicable)		
Title		
Street Address		
City, Town or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax

[Return to Top](#)

Site ID # M I D 0 0 5 0 5 7 0

11(b) Name of Site's Legal Operator

Same as Site Specific Name/Address

Approximate date became operator 10/01/2009

Approximate date ceased as operator _____

Full Name (Company or Individual as applicable)		
Title		
Street Address		
City, Town or Village		
State	Country	Zip Code
Email		
Phone	Ext	Fax

12. Type of Regulated Waste Activity (at your site) Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

Hazardous Waste Activities

<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	1. Generator of Hazardous Waste – If "Yes", mark only one of the following:	
<input type="checkbox"/> Date activity began	Large Quantity Generator (LQG)	-Generates, in any calendar month (includes quantities imported by importer site), 1,000 kg per month (mo) (2,200 pounds (lb)/mo) or more of non-acute hazardous waste; or -Generates, in any calendar month or accumulates at any time, more than 1 kg/mo (2.2 lb/mo) of acute hazardous waste; or -Generates, in any calendar month or accumulates at any time, more than 100 kg/mo (220 lb/mo) of acute hazardous spill cleanup material
<input type="checkbox"/> Date activity began	Small Quantity Generator (SQG)	100 to 1,000 kg/mo (220 to 2,200 lb/mo) of non-acute hazardous waste, and no more than 1 kg (2.2 lb) of acute hazardous waste, and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material
<input type="checkbox"/> 01/01/2021 Date activity began	Very Small Quantity Generator (VSQG)	Less than, or equal to, 100 kg/mo (220 lb/mo) of non-acute hazardous waste
If "Yes" above, indicate other generator activities in 2 and 3, as applicable		
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	2. Short Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes" provide an explanation in the Comments Section.	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	3. Mixed Waste (hazardous and radioactive) Generator	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	4. Treater, Stores or Disposer of Hazardous Waste – Note: A hazardous waste Part B permit is required for these activities	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	5. Receives Hazardous Waste from Off-site	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	6. Recycler of Hazardous Waste	
	<input type="checkbox"/> Recycler who stores prior to recycling	
	<input type="checkbox"/> Recycler who does not store prior to recycling	
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	7. Exempt Boiler and/or Industrial Furnace – If "Yes", mark all that apply.	
	<input type="checkbox"/> Small Quantity On-site Burner Exemption	
	<input type="checkbox"/> Smelting, Melting, and Refining Furnace Exemption	

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Site ID # MI D 0 0 5 0 5 7 0

Waste Codes for Federally Regulated Hazardous Waste. Please list the waste codes of the Federal Hazardous Wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D002, F007, U112). Use an additional page if more spaces are needed.

Waste Codes for State Regulated (non-Federal) Hazardous Waste. Please list the waste codes of the State Hazardous Wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

13. Additional Regulated Waste Activities

Other Waste Activities

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Transporter of Hazardous Waste – If “Yes”, mark all that apply. (May require permits or registration)
	<input type="checkbox"/> Transporter
	<input type="checkbox"/> Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Underground injection Control
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	United States Importer of Hazardous Waste
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Recognized Trader – If “Yes”, mark all that apply
	<input type="checkbox"/> Importer
	<input type="checkbox"/> Exporter
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Importer/Exporter of Spent Lead-Acid Batteries (SLABs under 40 Code of Federal Regulations 266 Subpart G) - If “Yes” , mark all that apply.
	<input type="checkbox"/> Importer
	<input type="checkbox"/> Exporter

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Universal Waste Activities

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) – If “Yes”, mark all that apply. Note: Refer to state regulations to determine what is regulated.
	<input type="checkbox"/> Batteries
	<input type="checkbox"/> Thermostats
	<input type="checkbox"/> Mercury Thermometers
	<input type="checkbox"/> Devices containing elemental mercury
	<input type="checkbox"/> Mercury Switches
	<input type="checkbox"/> Pesticides
	<input type="checkbox"/> Electric Lamps
	<input type="checkbox"/> Pharmaceuticals
	<input type="checkbox"/> Consumer Electronics
	<input type="checkbox"/> Antifreeze as defined in R 299.9101
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Destination Facility of Universal Waste (a hazardous waste permit may be required for this activity)

Used Oil Activities

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Used Oil Transporter – If “Yes”, mark all that apply.
	<input type="checkbox"/> Transporter
	<input type="checkbox"/> Transfer Facility (at your site)
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Used Oil Processor and/or Re-refiner – If “Yes,” mark all that apply.
	<input type="checkbox"/> Processor
	<input type="checkbox"/> Re-refiner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Off-Specification Used Oil Burner
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Used Oil Fuel Marketer – If “Yes”, mark all that apply.
	<input type="checkbox"/> Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
	<input type="checkbox"/> Marketer Who First Claims the Used Oil Meets the Specifications
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Used Oil Processor
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Used Oil Collection or Aggregation Point
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Collection Center or Aggregation Point that accepts DIY Used Oil

Liquid Industrial By-Product Activities

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Liquid Industrial By-Product Transporter – If “Yes”, mark all that apply. (requires Permit & Registration)
	<input type="checkbox"/> Transporter. Date Activity Began:
	<input type="checkbox"/> Transfer Facility (at your site). Date Activity Began:
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Transports Own Waste. Date Activity Began:
<input checked="" type="checkbox"/> Y <input type="checkbox"/> N	Liquid Industrial Waste By-Product Generator. Date Activity Began: 06/10/2009
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Liquid Industrial By-Product Designated Facility. Date Activity Began:

14. Eligible Academic Entities with Laboratories - Notification for opting into, or withdrawing from, managing laboratory hazardous wastes pursuant to 40 CFR 262, Subpart K.

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Opting into, or currently operating under, 40 CFR 262, Subpart K, for the management of hazardous wastes in laboratories. If “Yes”, mark all that apply. NOTE: See the item-by-item instructions for definitions of types of eligible academic entities.
	<input type="checkbox"/> College or University
	<input type="checkbox"/> Teaching Hospital that is owned by, or has a formal written affiliation, with a college or university
	<input type="checkbox"/> Non-profit Institute that is owned by, or has a formal written affiliation, with a college or university
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Withdrawing from 40 CFR 262, Subpart K, for the management of hazardous wastes in laboratories.

15. Episodic Generation

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category? If “Yes”, you must fill out the Addendum for Episodic Generator.
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16. LQG Consolidation of VSQG Hazardous Waste

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you an LQG notifying of consolidating VSQG hazardous waste under the control of the same person pursuant to 40 CFR 262.17(f)? If “Yes”, you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.
--	--

17. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional OR Entire Facility {Required})

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility
	Central Accumulation Area (CAA) or Entire Facility
	Expected Closure date:
	Requesting new closure date:
	Date Closed:
	In compliance with the closure performance standards 40 CFR 262.17(a)(8)
	Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

18. Notification of Hazardous Secondary Material (HSM) Activity

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing HSM under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If “Yes”, you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying under 40 CFR 260.53(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to, or unable to be compared to, a legitimate product or intermediate but that the recycling is still legitimate? If “Yes”, you may provide explanation in the Comments section (Number 19, below). You must also document that your recycling is still legitimate and maintain that documentation on site.

19. Electronic Manifest Broker

<input type="checkbox"/> Y <input checked="" type="checkbox"/> N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
--	--

20. Comments (include item number for each comment)

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21. Certification: I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. **Note: For the RCRA Hazardous Waste Part A Permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).**

Signature of legal owner, operator, or authorized representative <small>DocuSigned by:</small> <i>Charles Pinter</i>	Date (mm/dd/yyyy) 05/05/2021
Printed Name (First, Middle Initial, Last) Charles H Pinter	Title Senior Environmental Engineer
Email cpinter@ford.com	

Signature of legal owner, operator, or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial, Last)	Title
Email	

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Site ID # M I D 0 0 5 0 5 7 0

**ADDENDUM TO THE SITE IDENTIFICATION FORM
NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY**

ONLY FILL OUT THIS FORM IF:

You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under rule R 299.9204 (1)(aa), (bb) or (cc) of Part 111, (or federal equivalent);

AND

a. You are or will be managing excluded HSM in compliance with rules R 299.9202 (6)(a – f), or R 299.9204 (1)(aa – cc) (or federal equivalent) or have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section. Note: if your facility was granted a solid waste variance under rules R 299.9202 (6)(a – f) prior to July 13, 2015, your management of HSM under rules R 299.9202 (6)(a – f) is grandfathered under the previous regulations and you are not required to notify for the HWM management activity excluded under rules R 299.9202 (6)(a – f).

Reason for Notification (include dates where requested)

Facility will begin managing excluded HSM as of _____

Facility is still managing excluded HSM/re-notifying, as required, by March 1 of each even-numbered year.

Facility has stopped managing excluded HSM as of _____ and is notifying as required.

Description of Excluded HSM Activity: Please list the appropriate codes (see Code List section of the instructions) and quantities, in short tons, to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

Facility Code	Waste Codes for HSM	Estimate Short Tons of Excluded HSM to be Managed Annually	Actual Short Tons of Excluded HSM That Was Managed During the Most Recent Odd-numbered Year	Land-based Unit Code

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Site ID # M I D 0 0 5 0 5 7 0

**ADDENDUM TO THE SITE IDENTIFICATION FORM
EPISODIC GENERATOR**

ONLY fill out this form if:

You are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves the generator to a higher generator category pursuant to 40 CFR 262, Subpart L. Note: Only one planned and one unplanned episodic event are allowed within one year. Otherwise, you must follow the requirements of the higher generator category. Use additional pages if more space is needed.

Episodic Event

Planned Excess chemical inventory removal Tank Cleanouts Short-term construction or demolition Equipment maintenance during plant shutdowns Other _____	Unplanned Accidental Spills Production process upsets Product recalls "Acts of nature" (Tornado, hurricane, flood, etc.) Other _____
Emergency Contact Phone	Emergency Contact Name
Beginning Date (mm/dd/yyyy)	End Date (mm/dd/yyyy)

Waste 1

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

Waste 2

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

Waste 3

Waste Description	Estimated Quantity (in pounds)
Federal and/or State Hazardous Waste Codes	

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Site ID # M I D 0 0 5 0 5 7 0

**ADDENDUM TO THE SITE IDENTIFICATION FORM
LQG CONSOLIDATION OF VSQG HAZARDOUS WASTE**

ONLY fill out this form if:

You are an LQG receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed.

VSQG 1

Site ID Number (if assigned)	Name	
Street Address		
City, Town, or Village	State	Zip Code
Contact Phone Number	Contact Name	
Email		

VSQG 2

Site ID Number (if assigned)	Name	
Street Address		
City, Town, or Village	State	Zip Code
Contact Phone Number	Contact Name	
Email		

VSQG 3

Site ID Number (if assigned)	Name	
Street Address		
City, Town, or Village	State	Zip Code
Contact Phone Number	Contact Name	
Email		


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Section III

EPA Part A Permit Application Form

8700-23

OMB# 2050-0024; Expires 01/31/2017

SEND COMPLETED FORM TO: The Appropriate State or Regional Office.	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM		
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location) <input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below) <input type="checkbox"/> Site was a TSD facility and/or generator of >1,000 kg of hazardous waste, >1 kg of acute hazardous waste, or >100 kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)		
2. Site EPA ID Number	EPA ID Number M I D 0 0 5 0 5 7 0 0 5		
3. Site Name	Name: Ford River Raisin Warehouse		
4. Site Location Information	Street Address: 3200 East Elm Avenue Latitude = 41.90401 Longitude = -83.35089		
	City, Town, or Village: Monroe		County: Monroe
	State: Michigan	Country: USA	Zip Code: 48162
5. Site Land Type	<input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. NAICS Code(s) for the Site (at least 5-digit codes)	A. 3 3 6 3 9 9	c. 3 3 6 3 7 0	
	B. 3 3 6 3 5 0	D.	
7. Site Mailing Address	Street or P.O. Box: 3200 East Elm Avenue		
	City, Town, or Village: Monroe		
	State: Michigan	Country: USA	Zip Code: 48162
8. Site Contact Person	First Name: Chuck MI: Last: Pinter		
	Title: Senior Environmental Engineer		
	Street or P.O. Box: 290 Town Center Drive, Suite 800		
	City, Town or Village: Dearborn		
	State: Michigan	Country: USA	Zip Code: 48126
	Phone: 734-260-0928 Ext.:	Fax:	
9. Legal Owner and Operator of the Site	A. Name of Site's Legal Owner: Ford Motor Company		Date Became Owner: 10/2009
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	Street or P.O. Box: 3200 East Elm Avenue		
	City, Town, or Village: Monroe		Phone: 734-243-4859
	State: Michigan	Country: USA	Zip Code: 48162
	B. Name of Site's Operator: Ford Motor Company		Date Became Operator: 10/2009
Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other			

EPA ID Number

OMB#: 2050-0024; Expires 01/31/2017

10. Type of Regulated Waste Activity (at your site)
 Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

A. Hazardous Waste Activities; Complete all parts 1-10.

- Y N **1. Generator of Hazardous Waste**
 If "Yes," mark only one of the following – a, b, or c.
- a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs/mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs/mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs/mo) of acute hazardous spill cleanup material.
- b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs/mo) of non-acute hazardous waste.
- c. CESQG: Less than 100 kg/mo (220 lbs/mo) of non-acute hazardous waste.
- If "Yes" above, indicate other generator activities in 2-10.

- Y N **2. Short-Term Generator** (generate from a short-term or one-time event and not from on-going processes). If "Yes," provide an explanation in the Comments section.
- Y N **3. United States Importer of Hazardous Waste**
- Y N **4. Mixed Waste (hazardous and radioactive) Generator**

- Y N **5. Transporter of Hazardous Waste**
 If "Yes," mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)
- Y N **6. Treater, Storer, or Disposer of Hazardous Waste** Note: A hazardous waste Part B permit is required for these activities.
- Y N **7. Recycler of Hazardous Waste**
- Y N **8. Exempt Boiler and/or Industrial Furnace**
 If "Yes," mark all that apply.
- a. Small Quantity On-site Burner Exemption
- b. Smelting, Melting, and Refining Furnace Exemption
- Y N **9. Underground Injection Control**
- Y N **10. Receives Hazardous Waste from Off-site**

B. Universal Waste Activities; Complete all parts 1-2.

- Y N **1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes," mark all that apply.**
- a. Batteries
- b. Pesticides
- c. Mercury containing equipment
- d. Lamps
- e. Other (specify) _____
- f. Other (specify) _____
- g. Other (specify) _____
- Y N **2. Destination Facility for Universal Waste**
 Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities; Complete all parts 1-4.

- Y N **1. Used Oil Transporter**
 If "Yes," mark all that apply.
- a. Transporter
- b. Transfer Facility (at your site)
- Y N **2. Used Oil Processor and/or Re-refiner**
 If "Yes," mark all that apply.
- a. Processor
- b. Re-refiner
- Y N **3. Off-Specification Used Oil Burner**
- Y N **4. Used Oil Fuel Marketer**
 If "Yes," mark all that apply.
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID Number M I D 0 0 5 0 5 7 0 0 5

OMB#: 2050-0024; Expires 01/31/2017

D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- a. College or University
b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

Table with 7 columns for listing waste codes.

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

Table with 7 columns for listing waste codes.

EPA ID Number | M | I | D | 0 | 0 | 5 | 0 | 5 | 7 | 0 | 0 | 5 |

OMB#: 2050-0024; Expires 01/31/2017

12. Notification of Hazardous Secondary Material (HSM) Activity

Y N Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

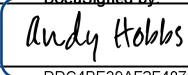
If "Yes," you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

13. Comments

The EPA RCRA subtitle C Site Identification Form 8700-23 is provided in accordance with EGLE application Form EQP 5111

Operating License - Hazardous Waste Treatment, Storage and Disposal.

14. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
 <p>DocuSigned by: DDC4BE39AF2F487...</p>	Andrew S. Hobbs, Director, Environmental Quality Office Ford Motor Copmany	Oct-26-2021



ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY

ONLY fill out this form if:

- ❖ You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statespf.htm> for a list of eligible states; **AND**
- ❖ You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) or you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

1. Indicate reason for notification. Include dates where requested.

- Facility will begin managing excluded HSM as of _____ (mm/dd/yyyy).
- Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.
- Facility has stopped managing excluded HSM as of _____ (mm/dd/yyyy) and is notifying as required.

2. Description of excluded HSM activity. Please list the appropriate codes and quantities in **short tons** to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

a. Facility code (answer using codes listed in the Code List section of the instructions)	b. Waste code(s) for HSM	c. Estimated short tons of excluded HSM to be managed annually	d. Actual short tons of excluded HSM that was managed during the most recent odd-numbered year	e. Land-based unit code (answer using codes listed in the Code List section of the instructions)

3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi). (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y N Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?

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EPA ID Number **M I D 0 0 5 0 5 7 0 0 5**

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United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact	First Name: Sean	MI:	Last Name: Townsend
	Contact Title: Plant Manager		
	Phone: 734-244-1340	Ext.:	Email:
2. Facility Permit Contact Mailing Address	Street or P.O. Box: 3200 East Elm Avenue		
	City, Town, or Village: Monroe		
	State: Michigan		
	Country: USA	Zip Code: 48162	
3. Operator Mailing Address and Telephone Number	Street or P.O. Box: 3200 East Elm Avenue		
	City, Town, or Village: Monroe		
	State: Michigan	Phone: 734-243-4859	
	Country: USA	Zip Code: 48162	
4. Facility Existence Date	Facility Existence Date (mm/dd/yyyy): 03/27/1995		

5. Other Environmental Permits

A. Facility Type <i>(Enter code)</i>	B. Permit Number											C. Description	
R	M	I	D	0	0	5	0	5	7	0	0	5	RCRA Attachment #
E	1	0	3	0	-	1							City of Monroe Discharge Permit Attachment #
E	1	0	3	0	-	2							City of Monroe Discharge Permit Attachment #

6. Nature of Business: Ford Motor Company Warehouse, Former Automotive Components Holdings LLC, Chassis Plant, Former Visteon Automotive Chassis Plant. Former Ford Metal stamping and former electroplating operation (other required attachments #)

7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3

- A. PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For “other” processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.
- B. PROCESS DESIGN CAPACITY** – For each code entered in Item 7.A; enter the capacity of the process.
1. **AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.
 2. **UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.
- C. PROCESS TOTAL NUMBER OF UNITS** – Enter the total number of units for each corresponding process code.

Process Code	Process	Appropriate Unit of Measure for Process Design Capacity	Process Code	Process	Appropriate Unit of Measure for Process Design Capacity
Disposal			Treatment (Continued) (for T81 – T94)		
D79	Underground Injection Well Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour
D80	Landfill	Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards	T82	Lime Kiln	
D81	Land Treatment	Acres or Hectares	T83	Aggregate Kiln	
D82	Ocean Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kiln	
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	
D99	Other Disposal	Any Unit of Measure Listed Below	T86	Blast Furnace	
Storage			T87	Smelting, Melting, or Refining Furnace	
S01	Container	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide Chloride Oxidation Reactor	
S02	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Methane Reforming Furnace	
S03	Waste Pile	Cubic Yards or Cubic Meters	T90	Pulping Liquor Recovery Furnace	
S04	Surface Impoundment	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid	
S05	Drip Pad	Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards	T92	Halogen Acid Furnaces	
S06	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Other Industrial Furnaces Listed in 40 CFR 260.10	
S99	Other Storage	Any Unit of Measure Listed Below	T94	Containment Building Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour
Treatment			Miscellaneous (Subpart X)		
T01	Tank Treatment	Gallons Per Day; Liters Per Day	X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T02	Surface Impoundment	Gallons Per Day; Liters Per Day	X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; Kilograms Per Hour; Gallons Per Hour; Liters Per Hour; or Gallons Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Hour; or Million BTU Per Hour	X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour	X04	Geologic Repository	Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters
T80	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour	X99	Other Subpart X	Any Unit of Measure Listed Below
Unit of Measure		Unit of Measure Code	Unit of Measure		Unit of Measure Code
Gallons		G	Short Tons Per Hour		D
Gallons Per Hour.....		E	Short Tons Per Day		N
Gallons Per Day		U	Metric Tons Per Hour		W
Liters.....		L	Metric Tons Per Day		S
Liters Per Hour.....		H	Pounds Per Hour.....		J
Liters Per Day.....		V	Kilograms Per Hour.....		X
			Million BTU Per Hour.....		X
			Cubic Yards		Y
			Cubic Meters.....		C
			Acres.....		B
			Acre-feet		A
			Hectares.....		Q
			Hectare-meter		F
			BTU Per Hour.....		I

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7. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only				
	(1) Amount (Specify)		(2) Unit of Measure								
X 1	S	0	2	533.788	G	001					
1 1	D	8	0	873	A	001					
2											
3											
4											
5											
6											
7											
8											
9											
1 0											
1 1											
1 2											
1 3											

Note: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)

Line Number (Enter #s in sequence with Item 7)	A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only				
	(1) Amount (Specify)		(2) Unit of Measure								
X 2	T	0	4	100.00	U	001					
				NA							

9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5

- A. EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

For non-listed waste: For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 9.D(1).
3. Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

2. PROCESS DESCRIPTION: If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
2. In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING Item 9 (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number	A. EPA Hazardous Waste No. (Enter code)					B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES																	
	(1) PROCESS CODES (Enter Code)										(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))														
X	1	K	0	5	4	900	P	T	0	3	D	8	0												
X	2	D	0	0	2	400	P	T	0	3	D	8	0												
X	3	D	0	0	1	100	P	T	0	3	D	8	0												
X	4	D	0	0	2																				Included With Above

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)													
Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Qty of Waste	C. Unit of Measure (Enter code)	D. PROCESSES									
				(1) PROCESS CODES (Enter Code)					(2) PROCESS DESCRIPTION (If code is not entered in 9.D(1))				
1													
2													
3													
4													
5													
6													
7													
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10													
11													
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EPA ID Number **| M | I | D | | 0 | 0 | 5 | | 0 | 5 | 7 | | 0 | 0 | 5 |**

OMB#: 2050-0024; Expires 01/31/2017

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

Line Number	A. EPA Hazardous Waste No. (Enter code)				B. Estimated Annual Qty of Waste				C. Unit of Measure (Enter code)	D. PROCESSES																												
										(1) PROCESS CODES (Enter Code)						(2) PROCESS DESCRIPTION (If code is not entered in 9.D.1)																						

EPA ID Number

M I D | 0 0 5 | 0 5 7 | 0 0 5

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10. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements. **Attachment II**

11. Facility Drawing Attachment III

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

12. Photographs Attachment IV

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

13. Comments

Attachment 1

**Copies of Existing Environmental
Permits**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 27 1995

REPLY TO THE ATTENTION OF:

HRP-8J

CERTIFIED MAIL: P 851 379 086
RETURN RECEIPT REQUESTED

Jerome S. Amber, P.E. Manager
Waste and Hazardous Substances
Environmental Quality Office
Ford Motor Company
15201 Century Drive
Suite 602
Dearborn, Michigan 48120

RE: Final RCRA Permit Decision
Ford Motor Company
Monroe Stamping Plant
MID 005 057 005

Dear Mr. Amber:

Enclosed is a copy of the Federal portion of the Resource Conservation and Recovery Act (RCRA) post-closure permit for the above referenced facility. The RCRA post-closure permit contains both Federal permit conditions (contained herein) and State permit conditions for which the Michigan Department of Natural Resources (MDNR) has been authorized under Title 40 Code of Federal Regulations (40 CFR) Part 271. Unless a review is requested under 40 CFR 124.19, the Federal portion shall become effective on the date indicated on the signature page of the post-closure permit. When both this portion of the permit and the State of Michigan's portion of the permit are effective, Ford Motor Company in Monroe, Michigan, has a RCRA post-closure permit authorizing those hazardous waste management activities specified in the RCRA post-closure permit.

The duration the post-closure permit is ten (10) years. However, the United States Environmental Protection Agency (U.S. EPA) may modify, revoke, reissue, or terminate this post-closure permit for cause specified in 40 CFR 270.41, 270.42, and 270.43.

This permit is effective on the date indicated on the signature page of the permit. Eligibility to appeal this permit is discussed further in 40 CFR 124.19. The original and one copy of the petition must be received by the U.S. EPA in Washington, D.C., at the address indicated below within 30 days after service of notice:

U.S. Environmental Protection Agency
Environmental Appeals Board (MC-1103B)
401 M Street, SW
Washington, D.C. 20460



Submissions made by hand-delivery (including overnight delivery) should be made at the following address:

U.S. Environmental Protection Agency
Environmental Appeals Board
Westory Building
607 14th Street, NW
Suite 500
Washington, D.C. 20005

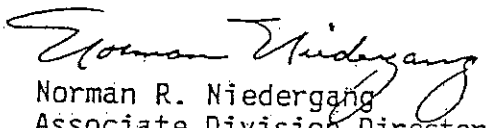
A copy of the petition should also be sent to:

RCRA Permitting Branch, HRP-8J
Waste Management Division
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

The procedures for filing an appeal are found in 40 CFR 124.19 (enclosed). The administrative appeal procedures must be completed prior to any action seeking judicial review.

Should you have any questions in this matter, please contact Shari Sutker at (312) 886-6151.

Sincerely yours,


Norman R. Niedergang
Associate Division Director
Office of RCRA
Waste Management Division

Enclosure

cc: Steven Sliver, MDNR
Michael Anastasio, EPA\ORC

§ 124.19 Appeal of RCRA, UIC, and PSD permits.

(a) Within 30 days after a RCRA, UIC, or PSD final permit decision (or a decision under § 270.29 to deny a permit for the active life of a RCRA hazardous waste management facility or unit) has been issued under § 124.15, any person who filed comments on that draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may petition for administrative review only to the extent of the changes from the draft to the final permit decision. The 30-day period within which a person may request review under this section begins with the service of notice of the Regional Administrator's action unless a later date is specified in that notice. The petition shall include a statement of the reasons supporting that review, including a dem-

§ 124.19

onstrations that any issues being raised were raised during the public comment period (including any public hearing) to the extent required by these regulations and when appropriate, a showing that the condition in question is based on:

(1) A finding of fact or conclusion of law which is clearly erroneous, or

(2) An exercise of discretion or an important policy consideration which the Environmental Appeals Board should, in its discretion, review.

(b) The Environmental Appeals Board may also decide on its initiative to review any condition of any RCRA, UIC, or PSD permit issued under this part. The Environmental Appeals Board must act under this paragraph within 30 days of the service date of notice of the Regional Administrator's action.

(c) Within a reasonable time following the filing of the petition for review, the Environmental Appeals Board shall issue an order granting or denying the petition for review. To the extent review is denied, the conditions of the final permit decision become final agency action. Public notice of any grant of review by the Environmental Appeals Board under paragraph (a) or (b) of this section shall be given as provided in § 124.10. Public notice shall set forth a briefing schedule for the appeal and shall state that any interested person may file an amicus brief. Notice of denial of review shall be sent only to the person(s) requesting review.

(d) The Environmental Appeals Board may defer consideration of an appeal of a RCRA or UIC permit under this section until the completion of formal proceedings under subpart E or F relating to an NPDES permit issued to the same facility or activity upon concluding that:

(1) The NPDES permit is likely to raise issues relevant to a decision of the RCRA or UIC appeals;

(2) The NPDES permit is likely to be appealed; and

(3) Either: (i) The interests of both the facility or activity and the public are not likely to be materially adversely affected by the deferral; or

40 CFR Ch. I (7-1-92)

(ii) Any adverse effect is outweighed by the benefits likely to result from a consolidated decision on appeal.

(e) A petition to the Environmental Appeals Board under paragraph (a) of this section is, under 5 U.S.C. § 552, a prerequisite to the seeking of review of the final agency action.

(f)(1) For purposes of judicial review under the appropriate Act, agency action occurs when a RCRA, UIC, or PSD permit is or denied by EPA and agency procedures are exhausted. A permit decision shall be issued by the Regional Administrator:

(i) When the Environmental Appeals Board issues notice to the party that review has been denied;

(ii) When the Environmental Appeals Board issues a decision on the merits of the appeal and the decision does not include a remand of the proceedings; or

(iii) Upon the completion of the proceedings if the proceedings are remanded, unless the Environmental Appeals Board's remand order specifically provides that appeal of the decision will be required to exhaust administrative remedies.

(2) Notice of any final agency action regarding a PSD permit shall be published in the Federal Register.

(g) Motions to reconsider an order shall be filed within 30 days after service of the final order. Every such motion must set forth the matters claimed to have been erroneously decided and the nature of the alleged errors. Motions for reconsideration under this provision shall be referred to, and decided by, the Environmental Appeals Board. Motion for reconsideration directed to the Regional Administrator, rather than to the Environmental Appeals Board, will not be considered, except in cases that the Environmental Appeals Board has referred to the Administrator pursuant to § 124.2 and in which the Administrator has issued the final order. A motion for reconsideration shall not be effective until the date of the final order specifically so ordered by the Environmental Appeals Board.

BASIS OF CAMU DECISION
FOR THE
FORD MOTOR COMPANY, MONROE STAMPING PLANT
MONROE, MICHIGAN, MID 005 057 005

Summary

The United States Environmental Protection Agency (U.S. EPA) is making a final decision, pursuant to 40 Code of Federal Regulations (40 CFR) 264.552(c), to approve the use of a Corrective Action Management Unit (CAMU) to facilitate the remediation of the hazardous waste surface impoundments at the Ford Motor Company, Monroe Stamping Plant in Monroe, Michigan. This Basis of Decision fulfills U.S. EPA's requirement under 40 CFR 264.552(f) to provide the public with formal documentation of the basis for a CAMU decision.

Application History

On July 18, 1994, Ford Motor Company (Ford) submitted a CAMU Petition request (herein referred to as the "application") to use a CAMU at the Monroe Stamping Plant. The application was reviewed and determined to be incomplete since the application did not provide sufficient information to enable the U.S. EPA to make a CAMU determination. Based on a review and evaluation of Ford's revised application, dated November 10, 1994, the U.S. EPA determined that Ford's application was complete and satisfactorily met the seven criteria, outlined below, necessary for a CAMU determination under 40 CFR 264.552.

Basis of Decision

The U.S. EPA's basis for approving the CAMU at the Monroe Stamping Plant is that the CAMU will (1) facilitate the implementation of reliable and protective cleanup methods (2) not create unacceptable risks to human health and the environment (3) allow remediation waste management in uncontaminated areas while maintaining protection of human health and the environment (4) minimize future releases of hazardous remediation wastes into the environment (5) expedite the cleanup of remediation wastes (6) enhance the long-term effectiveness of the remedial actions and (7) minimize the land areas where wastes will remain in place after closure. A detailed discussion of each basis is provided below.

1. The CAMU shall facilitate the implementation of reliable, effective, protective and cost-effective remedies

The CAMU shall facilitate the implementation of reliable, effective, protective and cost-effective remedies in that it will allow wastes to be treated (stabilized) and consolidated into two on-site containment units which will be located within the CAMU boundary. Each containment unit will be constructed with protective features that includes a leachate collection and removal system, soil-bentonite perimeter cutoff wall, and a composite cover system.

The stabilization process has been used in numerous other remediation projects and has been proven to be an effective method for providing the physical

the U.S. EPA, to be disposed in the containment units from the following on-site Solid Waste Management Units (SWMUs): Salaried Parking Lot; Coal Pile; Former Coal Pile; Rifle Range Area; Demolition Disposal Area; Empty Drum Storage Area; Former Drum Storage Area; Current Drum Storage Area; Filter Press Area; Dead Tree Area; and NPDES Outfall 002. The location of these SWMUs, which are identified under the federal corrective action program, are also shown in Figure 1.

Synchronizing concurrent corrective action investigations with closure activities has the potential to address most efficiently, reliably, and comprehensively these other areas as well as to provide flexibility in attaining containment area final grades. Without a CAMU approval, wastes from the above areas would be required to be consolidated in the Disposal Area D impoundment. This would result in steeper final grades and a higher elevation which would be less aesthetically compatible with the surrounding topography. The Disposal Area A, B, C impoundment would be too flat to provide adequate surface drainage without substantial regrading of waste materials, creating the potential for greater exposure to waste materials during earthwork activities. The CAMU allows the waste volumes in each containment unit to be balanced to provide adequate slopes and configurations most compatible with the surrounding terrain.

2. Waste management activities associated with the CAMU shall not create unacceptable risks to humans or to the environment resulting from exposure to hazardous wastes or constituents

Waste management activities associated with the CAMU will not create unacceptable risks to humans or to the environment resulting from exposure to hazardous wastes or hazardous waste constituents. A Public Health and Environmental Risk Assessment was performed for the closure activities at the Monroe Stamping Plant. The human health and environmental assessment demonstrates that closure of the hazardous waste surface impoundments does not create an unacceptable risk to human health or the environment.

In addition, air and particulate emissions generated during closure activities will be monitored and site activities will be managed under strict controls to prevent unacceptable risks to human health and the environment. A dust control program will be established to minimize the generation of dust by keeping construction road surfaces wet, sweeping site entrance roads if necessary, and storing and mixing dry solidification additives such as fly ash and bentonite in enclosed containers. Air quality monitoring will be performed on a continuous basis at four fixed air monitoring stations located on the Monroe Stamping Plant and Sterling State Park properties. Each station will be operated daily to monitor emissions of total suspended particulates, Volatile Organic Compounds, and total chromium.

3. The CAMU shall include uncontaminated areas of the facility, only if including such areas for the purpose of managing remediation waste is

technologies (including innovative technologies) to enhance the long-term effectiveness of remedial actions by reducing the toxicity, mobility, or volume of wastes that will remain in place after closure of the CAMU

The CAMU will enable the use of treatment technologies to enhance the long-term effectiveness of closure by reducing the toxicity and mobility of wastes that will remain in place after closure of the CAMU as discussed in Basis #1 above.

7. The CAMU shall, to the extent practicable, minimize the land area of the facility upon which wastes will remain in place after closure of the CAMU

The CAMU will minimize the land area of the facility upon which wastes will remain in place after closure of the CAMU by consolidating wastes from other areas into the containment units. Thus, the CAMU will allow the consolidation and remediation of Disposal Area D-North, Area D-West, former West Lagoon, West Marsh, North Intake Canal, and a portion of the Process Canal for a total area of approximately 17 acres. In addition, the CAMU will also allow wastes from SWMUs to be consolidated into the containment units if approved by the U.S. EPA.

The CAMU will also allow the containment unit sizes to be minimized by allowing the surplus waste associated with Disposal Area D and its surrounding areas to be transported to Disposal Areas A, B, and C. Without the CAMU, there would be insufficient volume in Disposal Areas A, B, and C to establish minimum final grades needed for surface water drainage. In addition, Disposal Area D impoundment would be too small to contain its solidified waste at slopes compatible with the surrounding terrain. The CAMU provides the flexibility needed to balance the waste volumes between each containment unit thereby ensuring stable and compatible slopes at each unit.

RESPONSE TO COMMENTS AND FINAL CAMU DECISION
ON THE DRAFT FEDERAL POST-CLOSURE PERMIT
TO BE ISSUED TO
FORD MOTOR COMPANY, MONROE STAMPING PLANT
MONROE, MICHIGAN MID 005 057 005

I. Introduction

This response is issued pursuant to Title 40 Code of Federal Regulations (40 CFR) Part 124.17, which requires that any changes of the draft post-closure permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in the response be included in the administrative record. In addition, the Basis for Corrective Action Management Unit (CAMU) Decision is also being issued pursuant to 40 CFR 264.552 (f). This Basis for Decision documents the rationale for approving a CAMU at the Ford Motor Company, Monroe Stamping Plant.

The public comment period commenced on January 20, 1995, with a public notice in the Monroe Evening News. The notice requested public comments on the draft Resource Conservation and Recovery Act post-closure permit for the Ford Motor Company, Monroe Stamping Plant. The public comment period ended March 9, 1995.

The written comments received by the United States Environmental Protection Agency (U.S. EPA) were from the Ford Motor Company (Ford), Lake Erie Cleanup Committee, and concerned citizens. The U.S. EPA's responses to Ford's comments are listed under Section II and U.S. EPA's response to comments from the Lake Erie Clean-Up Committee, Inc. and concerned citizens comments are listed under Section III.

II. Ford's Comments and U.S. EPA's Responses:

General Response

In Comments 2, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 16, 17, and 18, Ford has neither cited any reasons or justifications for its suggested language nor in any way cited, claimed, or demonstrated any deficiency, insufficiency, or inappropriateness in the proposed Permit language commented on or its intended or actual effect. This General Response is incorporated (without further reference) into each of the Responses to Comments 2, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 16, 17, and 18 below.

Comment 1

Effective Date. It is suggested that the title for this section read, "Expiration Date". It is suggested that the Permit be granted for a term of 10 years to avoid the cumbersome submittal and review process when little if any changes are required in the permit.

Response

Changing the title to "Expiration Date" would be inconsistent with the language and intent of this section. Therefore, the title of this

Response

The title for this section appears in the Code of Federal Regulations as "Transfer of Post-Closure Permits." Therefore, Post-Closure Permit Condition I.D.12. will not be changed.

Comment #5

Page 9 of 29, IV.A. It is suggested that the second sentence of the second paragraph read, "The Permittee shall remediate these areas, as necessitated by applicable requirements, in accordance with the terms and conditions specified in this post-closure permit and the State of Michigan's Post-Closure Operating License."

Response

The provisions of the Permit as well as RCRA and 40 CFR Parts 22 and 260-271 include appropriate and sufficient terms and conditions for remediation without the addition of the language suggested by Ford. Furthermore, the additional language suggested by Ford is unduly vague. Therefore, Post-Closure Permit Condition IV.A. will not be changed.

Comment #6

Page 9 of 29, IV.C. The title of this section should read, "Corrective Action Management Unit (CAMU)."

Response

The U.S. EPA concurs with Ford and will change Post-Closure Permit Condition IV.C. to read "Corrective Action Management Unit (CAMU)."

Comment #7

Page 10 of 29, IV.C.2. The title of this section should read, "Remediation Waste Management in A CAMU (40 CFR 264.552(e)(2))."

Response

The U.S. EPA concurs with Ford and will change Post-Closure Permit Condition IV.C.2. to read "Remediation Waste Management In A CAMU (40 CFR 264.552 (e)(2))."

Comment #8

Page 12 of 29, IV.C.2.c.(1). The last sentence of this paragraph should read, "The solidified wastes shall meet the performance criteria specified in Condition IV.C.2.b.(2) of this post-closure permit and in the State of Michigan Act 64 Post-Closure Operating License, as determined by final action of MDNR after considering comments or any appeals by Ford."

Comment 11

Page 24 of 29, IV.I. It is suggested that Dispute Resolution read as follows:

1. The permittee and U.S. EPA shall attempt to resolve expeditiously and informally any disagreements concerning implementation of this permit or any condition required hereunder.
2. In the event that any dispute arising under this permit is not resolved expeditiously through informal means, any party desiring dispute resolution under this Section shall give prompt written notice to the other party.
3. Within fourteen (14) calendar days of the service of notice of dispute pursuant to Paragraph 2 above, the party who gave notice shall serve on the other party to this order a written statement of the issues in dispute, the relevant facts upon which the dispute is based, and factual data, analysis or opinion supporting its position, and all supporting documentation on which such party relies (hereinafter the "Statement of Position"). The opposing party shall serve their Statement of Position, including supporting documentation, no later than fourteen (14) calendar days after receipt of the complaining party's Statement of Position. In the event that these 14 day time periods for exchange of Statements of Position may cause a delay in the work, they shall be shortened upon agreement between Permittee and U.S. EPA.
4. An administrative record of any dispute under this Section shall be maintained by U.S. EPA. The record shall include the written notification of such dispute, and the Statements of Position served pursuant to the preceding paragraphs.
5. Upon review of the administrative record, the Regional Administrator, Region 5, shall issue a decision consistent with the terms of this permit.
6. Notwithstanding the invocation of this dispute resolution procedure, the portions of the permit that are not affected by the dispute shall remain in effect.

Response

The dispute resolution provision of the Permit as well as applicable Federal law, including RCRA and regulations promulgated pursuant thereto, including 40 CFR Parts 22 and 260-271, afford appropriate and sufficient procedures by which to resolve any disputes arising under the permit without the addition of the language suggested by Ford. Ford has neither cited any reasons or justifications for its suggested language nor claimed or demonstrated that the current permit together with applicable Federal law do not afford appropriate and sufficient

waste from the SWMUs may be incorporated into the containment units without the addition of the language suggested by Ford. However, for purposes of clarity, U.S. EPA will insert the phrase "and nature and extent" after the term "presence" in the first sentence under Item I. Therefore, the first sentence in Item I in Attachment I will read: "The purpose of the Release Assessment (RA) is to document the absence or presence and nature and extent of hazardous waste or hazardous constituents at each Solid Waste Management Unit identified in Post-Closure Permit Condition IV.D." In addition, the U.S. EPA will modify Post-Closure Permit Condition IV.G.1. by adding the phrase "and nature and extent." Therefore, this condition will read: "The Permittee shall conduct a RA to document the absence or presence and nature and extent of hazardous waste(s) or hazardous constituents(s) from all SWMUs identified in Condition IV.D. above except for AOC #1."

Comment 15

Attachment IV., page 2 of 5. The first paragraph should have a statement of purpose. It is suggested that a sentence be added to read, "An Ecological Assessment shall be performed to document that the ecological concerns at the facility are being addressed by the closure activities."

Response

The terms and conditions of the Permit, including Attachment IV, as well as applicable Federal law, including the Endangered Species Act, RCRA and regulations promulgated pursuant thereto, including 40 CFR Parts 260-271, sufficiently and appropriately make clear the purpose of the Ecological Assessment without the addition of the statement suggested by Ford. Therefore, the U.S. EPA will not change the first paragraph of Attachment IV.

Comment 16

Attachment VI, page 4 of 5, III. It is suggested that the paragraph read, "If the Permittee is not required to perform additional investigations because the exposure to ecological receptors is minimal, the Permittee shall resubmit the Preliminary Ecological Assessment Report in the form of a Draft Ecological Assessment Report. This report shall be submitted to both the U.S. EPA and the MDNR. If additional investigations are required, the following outline shall be modified to account for investigations actually undertaken at the facility as appropriate."

Response

The U.S. EPA concurs with Ford's suggested language with the exception of the phrases "because the exposure to ecological receptors is minimal" and "as appropriate" because these phrases are undefined and unduly vague. The U.S. EPA will modify Item III of Attachment IV to read: "If the Permittee is not required to perform additional investigations, the

2. Protective Measures Plan (PMP)

Within 30 days of the effective date of this post-closure permit and prior to initiation of closure activities specified in this post-closure permit, the Permittee shall implement the PMP for the bald eagle. The purpose of the PMP is to ensure that the bald eagle pair at the facility is protected during the post-closure permit activities.

The U.S. EPA will add an additional permit requirement to Post-Closure Condition VI. The new requirement, labeled Post-Closure Permit Condition VI.A.3., will require Ford to submit a Bald Eagle Management Plan and will read as follows:

3. Bald Eagle Management Plan

By November 1, 1995, the Permittee shall submit a Bald Eagle Management Plan. The Regional Administrator will approve, modify and approve, or disapprove and provide comments on the Bald Eagle Management Plan in writing to the Permittee. Within 30 days of receipt of such comments, the Permittee must modify the Plan to reflect changes required in the Regional Administrator's comments. The Bald Eagle Management Plan, as approved or as modified and approved, becomes an enforceable condition of this post-closure permit.

The U.S. EPA will delete Post-Closure Permit Condition VI.C.2. which requires Ford to submit bimonthly progress reports because the U.S. EPA has determined that this requirement is not necessary.

The U.S. EPA will modify the Schedule of Compliance in Post-Closure Permit Condition VII.E. as follows:

1. Delete the requirement to submit a PMP Report;
2. Delete the requirement to submit a Modified or New PMP Report;
3. Delete the requirement to submit Progress Reports;
4. Modify due date of the PMP Implementation from "Within 30 days of Regional Administrator's comments" to "Within 30 days of the effective date of post-closure permit and prior to initiation of closure activities";
5. Add the requirement to submit a Bald Eagle Management Plan by November 1, 1995; and
6. Add the requirement to submit a Modified or New Bald Eagle Management Plan within 30 days of receipt of Regional Administrator's comments.

The U.S. EPA will modify Item B.2. and Item B.3. of Attachment V based on Ford's suggestions discussed in Comment #17 above. In addition, the U.S. EPA shall add two additional requirements labeled Item B.4. and Item B.5. to Attachment V. Therefore, Item B.2. through Item B.5. of Attachment V will read as follows:

- b. Schedule closure activities, that require walking and other out-of-vehicle activities, outside the critical zone during breeding season;
- c. Insure that vehicle drivers stay in their vehicle while in the critical zone during the breeding season.

The U.S. EPA will delete Item C. of Attachment V since the requirement to submit progress reports for the Protective Measures Plan is not necessary.

III. Comments from Lake Erie Clean-Up Committee, Inc. and Concerned Citizens and U.S. EPA's Response

The U.S. EPA received the following comments from concerned citizens. Some of these comments were addressed by the MDNR since they related to specific conditions in the State of Michigan Act 64 Post-Closure Operating License. The MDNR responses to the following comments are listed below.

Comment 1

The plan to use the 40 mil plastic sheet liner made from ultra low density polyethylene rather than a 40 mil vinyl sheet liner should be reconsidered. A "dioctylphthalate plasticized polyvinyl chloride" liner is conventionally used for ponds to collect and treat oily waste water and has significantly better ultra violet resistance to sun light and general weathering properties better than the polyethylene materials. To contain the organic solvent content of this huge mass of chemical waste and associated heavy metal content for 30 years plus, much care and thought must be given to selection of the best liner material.

MDNR Response

The liner will be used in the cap, and will not be exposed to waste or weathering. The choice of liner is appropriate and consistent with manufacturer specifications and standard practice.

Comment 2

To stabilize the clay-bentonite entombment and to avoid high wind erosion and dust problems, a durable stone/rock support should be used, as in a nearby entombment at the Pointe Mouillee State Game Area.

MDNR Response

The perimeter of the containment units that would be exposed to wave action and other erosion problems are protected by stones.

Comment 6

Has there been any discussion of other contaminated areas at the Ford plant? Allegedly, there is a substantial quantity of industrial waste buried under the steel storage building near the plant.

Response

In accordance with Section 3004(u) of RCRA and the regulations promulgated pursuant thereto, Ford must institute Corrective Action as necessary to protect human health and environment for all releases of hazardous waste(s) or hazardous constituent(s) from any Solid Waste Management Units (SWMUs) at the facility, regardless of the time at which waste was placed in such units. If other contaminated areas, including the area where industrial wastes are allegedly buried, are within a SWMU, then those areas will be addressed pursuant to the terms of the Permit and applicable law.

Comment 7

The project, including the CAMU, is not consistent with an area-wide approach to cleaning up the entire harbor or future harbor development plans.

Response

Surrounding land use planning and area-wide cleanup issues are beyond the scope of the Federal permit. The authority under the Federal post-closure permit only applies to the cleanup of the hazardous waste surface impoundments, cleanup of solid waste management units, and cleanup of any past environmental contamination that has migrated beyond the facility boundary.

Comment 8

What form of mitigation has been suggested to compensate for the removal of wetlands from the ecosystem? A barrier or breakwall should be installed to allow regeneration of wetland landward, and all remaining wetlands in the vicinity of the CAMU should remain undisturbed and become part of Sterling State Park.

Response

The wetland restoration and mitigation are covered by the Inland Lakes and Streams Act and Wetlands Protection Act permit. The containment units will only cover the area occupied by the surface impoundments. Wetland mitigation is not required for these hazardous waste disposal areas. Hazardous waste that has migrated to the West Marsh will be removed and approximately 9.3 acres of that wetland will be restored. The 0.9 acres parcel in the East Marsh that is taken as part of the Edison Tower relocation, and a 0.1 acre parcel near the North Intake

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
HAZARDOUS WASTE MANAGEMENT POST-CLOSURE PERMIT

Name of Permittee: Ford Motor Company, Monroe Stamping Plant

Facility Location: Street Address: 3200 East Elm Street
City, State: Monroe, Michigan 48161

EPA Identification Number: MID 005 057 005

Effective Date: _____

Expiration Date: _____

Authorized Activities:

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, (42 U.S.C. §6901, et seq.), and regulations promulgated thereunder by the United States Environmental Protection Agency (U.S. EPA) (codified in Title 40 of the Code of Federal Regulations (40 CFR)), Federal post-closure permit conditions (hereinafter called the post-closure permit) of the RCRA post-closure permit are issued to Ford Motor Company (hereinafter called the Permittee), for the facility (Monroe Stamping Plant) located in Monroe, Michigan.

The RCRA permit contains both the effective Federal post-closure permit conditions (contained herein) and the effective State post-closure permit conditions issued by the State of Michigan's RCRA program authorized under 40 CFR Part 271 (hereinafter called the State post-closure license). The RCRA post-closure permit authorizes the Permittee to conduct post-closure activities as specified in the RCRA post-closure permit.

Post-Closure Permit Approval:

On October 30, 1986, the State of Michigan received final authorization pursuant to Section 3006 of RCRA, 42 U.S.C. §6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. Because the State of Michigan has not yet received authorization to administer the entire hazardous waste program requirements of HSWA, certain post-closure permit conditions must be issued by the U.S. EPA to address these requirements. These conditions are contained in this post-closure permit.

The Permittee must comply with all terms and conditions of this post-closure permit. This post-closure permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260, 261, 262, 264, 266, 268, 270, and 124, and applicable provisions of HSWA.

This post-closure permit is based on the assumption that the information submitted in the post-closure permit application, dated July 19, 1994, and in any subsequent amendments (hereinafter referred to as the application), is accurate. Any inaccuracies found in this information may be grounds for the termination, revocation and reissuance, or modification of this post-closure permit (see 40 CFR 270.41, 270.42 and 270.43) and potential enforcement action. The Permittee must inform the U.S. EPA of any deviation from or changes in the information in the submitted application and certification as soon as the Permittee becomes aware of such deviation or changes.

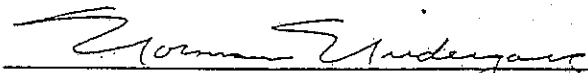
Opportunity to Appeal:

Petitions for review must be submitted within 30 days after service of notice of the final post-closure permit decision. Any person who filed comments on the draft post-closure permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the post-closure permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft post-closure permit may petition the Environmental Appeals Board to review only to the extent of the changes from the draft to the final post-closure permit decision. The procedures for permit appeals are found in 40 CFR 124.19.

Effective Date:

This post-closure permit is effective as of _____, unless a review is requested under 40 CFR 124.19, and shall remain in effect for a fixed term not to exceed 10 years, unless revoked and reissued, or terminated (40 CFR 270.41, 270.43, 270.50) or continued in accordance with 40 CFR 270.51.

BY:



Norman R. Niedergang
Associate Division Director
Office of RCRA
Waste Management Division

DATE:

3/27/95

Ford Motor Company
Monroe Stamping Plant
Monroe, Michigan

POST-CLOSURE PERMIT INDEX

POST-CLOSURE PERMIT CONDITIONS:

- I. Standard Conditions
- II. General Facility Conditions
- III. Land Disposal Requirements
- IV. Corrective Action Requirements
- V. Toxicity Characteristic
- VI. Endangered Species Act Requirements
- VII. Schedule of Compliance

ATTACHMENTS:

- I. RCRA Corrective Action Plan
- II. Facility Maps: CAMU Boundary Location Map
Western and Eastern Containment Unit Location Map
SWMU Location Map
- III. Corrective Action Definitions
- IV. Ecological Assessment
- V. Biological Assessment and Protective Measures Plan

POST-CLOSURE PERMIT CONDITIONS

(Note: The regulatory citations in parentheses are incorporated by reference.)

I. STANDARD CONDITIONS

A. EFFECT OF POST-CLOSURE PERMIT (40 CFR 270.4 and 270.30(g))

The Permittee is allowed to manage hazardous waste in accordance with the conditions of the RCRA post-closure permit. Any unauthorized management of hazardous waste is prohibited.

Compliance with the RCRA post-closure permit during its term constitutes compliance, for the purposes of enforcement, with Subtitle C of RCRA, except for those requirements not included in the post-closure permit which become effective by statute, or which are promulgated under 40 CFR Part 268, restricting the placement of hazardous waste in or on the land. Issuance of this post-closure permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this post-closure permit does not constitute a defense to any order issued or any action brought under Sections 3008(a), 3008(h), 3013, or 7003 of RCRA; Sections 104, 106(a), or 107 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (42 U.S.C. §9601 *et seq.*, commonly known as CERCLA); or any other law providing for protection of public health or the environment.

B. POST-CLOSURE PERMIT ACTIONS (40 CFR 270.30(f))

This post-closure permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 270.41, 270.42, and 270.43. This post-closure permit may also be reviewed and modified by the U.S. EPA, consistent with 40 CFR 270.41, to include any terms and conditions determined necessary to protect human health and the environment pursuant to Section 3005(c)(3) of RCRA. The filing of a request for a post-closure permit modification, revocation and reissuance, or termination, or the notification of planned changes, or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any post-closure permit condition. The Permittee shall not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective.

C. SEVERABILITY (40 CFR 124.16)

The provisions of this post-closure permit are severable, and if any provision of this post-closure permit, or if the application of any provision

MODIFIED

of this post-closure permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this post-closure permit shall not be affected thereby.

D. DUTIES AND REQUIREMENTS

1. Duty to Comply. (40 CFR 270.30(a))

The Permittee shall comply with all conditions of this post-closure permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit (See 40 CFR 270.61). Any post-closure permit noncompliance, other than noncompliance authorized by an emergency permit, constitutes a violation of RCRA and HSWA and is grounds for enforcement action, post-closure permit termination, revocation and reissuance, modification, denial of a post-closure permit renewal application, or other appropriate action.

2. Duty to Reapply. (40 CFR 270.30(b) and 270.10(h))

The Permittee shall submit a complete application for a new post-closure permit at least 180 days before this post-closure permit expires unless: a) the Permittee no longer wishes to operate a hazardous waste management facility; b) the Permittee is no longer required to have a RCRA post-closure permit; or c) permission for a later date has been granted by the Regional Administrator. The Regional Administrator shall not grant permission for applications to be submitted later than the expiration date of the existing permit.

3. Post-Closure Permit Expiration. (40 CFR 270.13, 270.14, 270.50, and 270.51)

This post-closure permit and all conditions herein shall be effective for a fixed term not to exceed 10 years, and will remain in effect beyond the permit's expiration date only if the Permittee has submitted a timely, complete post-closure permit application (per 40 CFR 270.10 and applicable sections of 270.14 through 270.29): a) to both the U.S. EPA and the State; and b) through no fault of the Permittee, the Regional Administrator and the State have not issued a new post-closure permit, as set forth in 40 CFR 270.51.

4. Need to Halt or Reduce Activity Not a Defense. (40 CFR 270.30(c))

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this post-closure permit.

5. Duty to Mitigate. (40 CFR 270.30(d))

In the event of releases or noncompliance with the post-closure permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health and the environment.

6. Proper Operation and Maintenance. (40 CFR 270.30(e))

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this post-closure permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality control/quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the post-closure permit.

7. Duty to Provide Information. (40 CFR 270.30(h) and 264.74)

The Permittee shall furnish to the Regional Administrator, within the time designated by the Regional Administrator, any relevant information which the Regional Administrator may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this post-closure permit, or to determine compliance with this post-closure permit. The Permittee shall also furnish to the Regional Administrator, upon request, copies of records required to be kept by this post-closure permit.

8. Inspection and Entry. (40 CFR 270.30(i))

The Permittee shall allow the Regional Administrator, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

- a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this post-closure permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this post-closure permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this post-closure permit; and

- d. Sample or monitor, at reasonable times, for the purposes of assuring post-closure permit compliance, or as otherwise authorized by RCRA, any substances or parameters at any location.
9. Monitoring and Recordkeeping. (40 CFR 270.30(j), 270.31, 264.73, and 264.74)

The Permittee shall retain all reports, records, or other documents, required by this post-closure permit, and records of all data used to complete the application for this post-closure permit, for a period of at least 3 years from the date of the reports, records or other documents. Corrective Action records must be maintained at least 3 years after all Corrective Action activities have been completed. These periods may be extended by request of the Regional Administrator at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

10. Reporting Planned Changes. (40 CFR 270.30(1)(1))

The Permittee shall give notice to the Regional Administrator of any planned physical alterations or additions to the permitted facility, as soon as possible, and at least 30 days before construction of such alteration or addition is commenced.

11. Anticipated Noncompliance. (40 CFR 270.30(1)(2))

The Permittee shall give advance notice to the Regional Administrator of any planned changes in the permitted facility or activity which may result in noncompliance with post-closure permit requirements. Such notice does not constitute a waiver of the Permittee's duty to comply with post-closure permit requirements.

12. Transfer of Post-Closure Permits. (40 CFR 270.30(1)(3), 270.40(a), and 264.12(c))

This post-closure permit may be transferred by the Permittee to a new owner or operator only after providing notice to the Regional Administrator and only if the post-closure permit is modified, or revoked and reissued, pursuant to 40 CFR 270.40(b), 270.41(b)(2), or 270.42(a). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 268, and 270 (including all applicable corrective action requirements), and shall provide a copy of the RCRA post-closure permit to the new owner or operator.

13. Compliance Schedules. (40 CFR 270.30(1)(5) and 270.33)

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this post-closure permit shall be submitted to the Regional Administrator no later than 14 days following each scheduled date.

14. Twenty-four Hour Reporting. (40 CFR 270.30(1)(6) and 270.33)

The Permittee shall report to the Regional Administrator any noncompliance with this post-closure permit which may endanger human health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:

- a. Information concerning the release of any hazardous waste which may endanger public drinking water supplies; and
- b. Information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, which could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:
 - (1) Name, address, and telephone number of the owner or operator;
 - (2) Name, address, and telephone number of the facility;
 - (3) Date, time, and type of incident;
 - (4) Name and quantity of material(s) involved;
 - (5) The extent of injuries, if any;
 - (6) An assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and
 - (7) Estimated quantity and disposition of recovered material that resulted from the incident.

A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period(s) of noncompliance (including exact dates and times); steps taken to minimize impact on the environment; whether the noncompliance has been corrected, and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate and prevent recurrence of the noncompliance. The Permittee need not comply with the 5-day written notice requirement if the Regional

Administrator waives the requirement. Upon waiver of the 5-day requirement, the Permittee shall submit a written report within 15 days of the time the Permittee becomes aware of the circumstances.

15. Other Noncompliance. (40 CFR 270.30(1)(10))

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above within 15 days of when the Permittee becomes aware of the noncompliance. The reports shall contain the information listed in Condition I.D.14.

16. Other Information. (40 CFR 270.30(1)(11))

Whenever the Permittee becomes aware that it failed to submit any relevant facts, or submitted incorrect information to the Regional Administrator in the post-closure permit application or in any reports, records, or other documentation provided to the Regional Administrator, the Permittee shall promptly submit such facts or information.

17. Submittal of Reports or Other Information. (40 CFR 270.30(1)(7), (8), and (9), and 270.31)

All reports or other information required to be submitted pursuant to this post-closure permit shall be sent to:

RCRA Permitting Branch, HRP-8J
Waste Management Division
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: Michigan Section

18. All other requirements contained in RCRA, as amended, and in 40 CFR 270.30 not set forth herein are hereby fully incorporated in this post-closure permit.

E. SIGNATORY REQUIREMENT (40 CFR 270.30(k))

All reports or other information submitted to or requested by the Regional Administrator, his designee, or authorized representative, shall be signed and certified as required by 40 CFR 270.11.

F. CONFIDENTIAL INFORMATION

In accordance with 40 CFR 270.12 and 40 CFR Part 2, Subpart B; any information submitted to the U.S. EPA pursuant to this post-closure permit may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission in the manner prescribed on the

application form or instructions, or, in the case of other submission, by marking the words "Confidential Business Information" on each page containing such information.

If no claim is made at time of submission, the U.S. EPA may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 CFR Part 2.

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY

The Permittee shall maintain at the facility, until completion of post-closure care under 40 CFR 264.120, is completed and certified by an independent registered professional engineer, all items required by 40 CFR 264.73, including the following documents and all amendments, revisions, and modification to these documents:

1. Waste Analysis Plan, as required by 40 CFR 264.13 and this post-closure permit;
2. Operating Record, as required by 40 CFR 264.73 and this post-closure permit;
3. Waste minimization certifications, as required by 40 CFR 264.73(b)(9); and
4. Corrective Action reports and records, as required by Conditions IV.G, VI, and VII. III.F. of this post-closure permit. These reports and records must be maintained for at least 3 years after all Corrective Action activities have been completed.

H. COMPLIANCE WITH OTHER FEDERAL LAWS (40 CFR 270.3)

The Permittee must comply with the following Federal Laws, if applicable;

1. The Wild and Scenic Rivers Act (16 U.S.C. 1273 et seq., Section 7);
2. The National Historic Preservation Act of 1986 (16 U.S.C. 470 et seq., Section 106, and implementing regulations 36 CFR Part 800);
3. The Endangered Species Act (16 U.S.C. 1531 et seq., Section 7, and implementing regulations 50 CFR Part 402);
4. The Coastal Zone Management Act (16 U.S.C. 1451 et seq., Section 307(c), and implementing regulations 15 CFR Part 930); and
5. The Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.).

If the Permittee finds that any of these laws may be applicable to the issuance, modification, or conditions of this post-closure permit, the Permittee must notify the Regional Administrator within 14 days of discovery. Any noncompliance with these other Federal Laws may be grounds for enforcement action, post-closure permit termination, revocation and reissuance, modification, denial of a post-closure permit renewal application, or other appropriate action.

II. GENERAL FACILITY CONDITIONS

A. WASTE ACCEPTANCE

1. The Permittee is prohibited from receiving any hazardous waste(s) or remediation waste(s), as defined in 40 CFR 260.10, from off-site sources and placing these waste(s) into the Western or Eastern containment units.
2. The Permittee is prohibited from placing any liquids into the Western or Eastern containment units.

B. LAND DISPOSAL REQUIREMENTS

A. GENERAL CONDITIONS

1. The Permittee shall comply with all the applicable self-implementing requirements of 40 CFR Part 268 and all applicable land disposal requirements which become effective by statute (Section 3004 of RCRA).
2. The Permittee must test, in accordance with 40 CFR 268.7(a), any waste generated at the facility, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
3. For restricted wastes with treatment standards expressed as concentrations in the waste extract, as specified in 40 CFR 268.41, the Permittee shall test the wastes or waste treatment residues, or extracts of such residues developed using the test methods described in Appendix II of 40 CFR Part 261 (Toxicity Characteristic Leaching Procedure, or TCLP) to assure that the wastes or waste treatment residues or extracts meet the applicable treatment standards of 40 CFR Part 268, Subpart D. Such testing shall be performed as required by 40 CFR 264.13.
4. A restricted waste for which a treatment technology is specified under 40 CFR 268.42(a) may be land disposed after it is treated using that specified technology or an equivalent treatment method approved by the Administrator under the procedures set forth in 40 CFR 268.42(b).
5. For restricted wastes with treatment standards expressed as concentrations in the waste, as specified in 40 CFR 268.43, the Permittee shall test the wastes or waste treatment residues (not an

extract of such residues) to assure that the wastes or waste treatment residues meet the applicable treatment standards of 40 CFR Part 268, Subpart D. Such testing shall be performed as required by 40 CFR 264.13.

IV. CORRECTIVE ACTION REQUIREMENTS

A. CORRECTIVE ACTION AT THE FACILITY

In accordance with Section 3004(u) of RCRA and the regulations promulgated pursuant thereto, the Permittee must institute Corrective Action as necessary to protect human health and the environment for all releases of hazardous waste(s) or hazardous constituent(s) from any solid waste management units (SWMU) at the facility, regardless of the time at which waste was placed in such units. In addition, Section 3004(u) of RCRA allows RCRA facilities to use a Corrective Action Management Unit (CAMU), if approved by the Regional Administrator under 40 CFR 264.552 (c), to facilitate cleanup of past environmental contamination in a manner that is protective of human health and the environment.

For purposes of implementing corrective action, the Permittee shall use a single CAMU, as described in Condition IV.C. below, to facilitate cleanup of SWMUs, surface impoundments, and other disposal areas at the facility. The Permittee shall remediate these areas in accordance with the terms and conditions specified in this post-closure permit and the State of Michigan's Post-Closure Operating License. Corrective Action definitions and terms can be found in Attachment IV. to this post-closure permit.

B. CORRECTIVE ACTION BEYOND THE FACILITY BOUNDARY

In accordance with Section 3004(v) of RCRA and the regulations promulgated pursuant thereto, the Permittee must implement Corrective Action(s) beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Regional Administrator that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be addressed under the Release Assessment, RCRA Facility Investigation, Corrective Measures Study, and Corrective Measures Implementation phases, as determined to be necessary on a case-by-case basis.

C. CORRECTIVE ACTION MANAGEMENT UNIT (CAMU)

The Permittee shall use a single CAMU at the facility, as defined in 40 CFR 260.10, pursuant to implementing corrective action requirements under 40 CFR 264.101 and Section 3004(u) of RCRA. The Permittee shall only use the CAMU

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for the management of remediation wastes, as defined in 40 CFR 260.10 and for wastes managed under Section 3004(v) of RCRA for releases beyond the facility boundary. Since the Regional Administrator has designated the regulated units at the facility as part of the CAMU, in accordance with 40 CFR 264.552(b)(1), the Permittee may manage remediation wastes from SWMUs and regulated units in the CAMU.

1. Areal Configuration Of CAMU Boundary (40 CFR 264.552(e)(1))

The areal configuration of the CAMU boundary shall include regulated units and nonregulated units or SWMUs. The areal configuration of the CAMU shall include Disposal Areas A, B; C (including Polishing Lagoon), Area D, North Lagoon, Former West Lagoon, Process Canal, and areas occupied by the Wastewater Treatment Plant. The CAMU boundary shall be as shown in Attachment II (Plate A) to this post-closure permit and in Construction Drawing No. 2, Volume VI, of the RCRA Post-Closure Operating License Application.

The western portion of the CAMU boundary shall contain Disposal Area D (SWMU), North Lagoon (SWMU), and the Former West Lagoon (regulated unit). The western portion of the CAMU is bounded to the north by the North Intake Canal; to the West by Area D-West; to the south by the Ford-Monroe manufacturing building; and to the east by the North Marsh.

The eastern portion of the CAMU boundary shall contain Disposal Areas A and B (regulated units), Area C (SWMU) which includes the Polishing Lagoon (regulated unit), and the Process Canal (regulated unit). The eastern portion of the CAMU boundary is bounded to the north by the North Marsh; to the west by the Ford-Monroe manufacturing building; to the south by the River Raisin; and to the east by the East Marsh.

2. Remediation Waste Management In A CAMU (40 CFR 264.552(e)(2))

a. General Conditions

- (1) The CAMU shall only be used for the management of remediation wastes, as defined in 40 CFR 260.10, pursuant to implementing corrective action requirements under 40 CFR 264.101 and Section 3004(v) of RCRA. The CAMU may also be used for implementing corrective action under RCRA Section 3004(u) for releases beyond the facility boundary.
- (2) Placement of remediation wastes into or within the CAMU does not constitute land disposal of hazardous waste and is not subject to Land Disposal Restrictions (LDRs) under 40 CFR Part 268 and Section 3004(g) of RCRA.

- (3) Consolidation or placement of remediation wastes into or within a CAMU does not constitute creation of a unit subject to Minimum Technology Requirements (MTRs) under 40 CFR 264.301 and Section 3004(o) and Section 3015 of RCRA.
- (4) Movement and placement of remediation wastes from SWMUs at the facility into the CAMU at the facility is not subject to LDRs or MTRs under Sections 3004(g) and 3004(o) of RCRA.
- (5) Excavation of remediation wastes from a CAMU, treatment on-site in another unit (i.e., temporary tank or generator accumulation tank) and redeposition of those wastes or residuals into the CAMU, is not subject to LDRs or MTRs under Sections 3004(g) and 3004(o) of RCRA.
- (6) Excavation of remediation wastes from areas outside the CAMU, treatment on-site either in-situ or ex-situ in another unit (i.e., temporary unit or a generator accumulation tank) and deposition of those wastes or residuals into the CAMU, is not subject to LDRs or MTRs under Section 3004(g) and Section 3004(o) of RCRA.
- (7) Excavation of remediation wastes from a CAMU and placement of those wastes into a land-based unit that is not the CAMU (either at the facility or off-site) or part of the designated CAMU, is subject to applicable LDRs and MTRs under Sections 3004(g) and 3004(o) of RCRA.
- (8) Excavation of remediation wastes from a CAMU, treatment off-site in another unit, and redeposition of those wastes into the CAMU is subject to LDRs and MTRs under Section 3004(g) and Section 3004(o) of RCRA.

b. Requirements For Areas Within CAMU Boundary

(1) Waste Management Within CAMU Boundary

The Permittee may manage remediation wastes in areas located within the CAMU boundary, as shown in Attachment II (Plate A), in accordance with this post-closure permit and the State of Michigan Act 64 Post-Closure Operating License. The areas located within the CAMU boundary include Disposal Areas A, B, C, D, North Lagoon, Process Canal, Former West Lagoon, and the area occupied by the Wastewater Treatment Plant. The Permittee may treat (solidify) remediation wastes in Disposal Areas A, B, C, D, North Lagoon, and the Process Canal in-situ. The Permittee shall solidify remediation wastes in areas within the CAMU boundary in accordance with the requirements of this post-closure permit and the State of Michigan Post-

Closure Operating License. If treatment is performed ex-situ, the Permittee shall comply with the generator accumulation tank requirements under 40 CFR Part 262 and the requirement of the State of Michigan Act 64 Post-Closure Operating License. The solidified wastes shall meet the performance criteria specified in Condition IV.C.2.b.(2) below and in the State of Michigan Act 64 Post-Closure Operating License.

(2) Performance Criteria

The Permittee shall comply with the following performance criteria for solidified remediation wastes: (1) solidified wastes shall have a minimum 28-day unconfined compressive strength of at least 25 pounds per square inch (2) solidified wastes shall not contain free liquids and (3) solidified wastes shall be fine-grained material capable of being excavated using ordinary excavation methods.

c. Requirements for Areas Outside CAMU Boundary

(1) Waste Management Outside CAMU Boundary

The Permittee may manage remediation wastes in areas located outside the CAMU boundary (Area D-North, D-West, North Intake Canal, and the West Marsh) in accordance with this post-closure permit and the State of Michigan Act 64 Post-Closure Operating License. The Permittee may either treat (solidify) wastes in-situ or ex-situ in generator accumulation tanks prior to disposal in the Western or Eastern containment units, as discussed in Post-Closure Permit Condition IV.C.3.a. If treatment is performed ex-situ, the Permittee shall comply with the generator accumulation requirements under 40 CFR Part 262 and the State of Michigan Act 64 Operating License. In addition, the Permittee shall solidify wastes in areas located outside the CAMU boundary in accordance with the requirements of this post-closure permit, and the State of Michigan Post-Closure Operating License. The solidified wastes shall meet the performance criteria specified in Condition IV.C.2.b.(2) of this post-closure permit and in the State of Michigan Act 64 Post-Closure Operating License.

3. Closure

The Permittee shall close the CAMU in a manner that controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous remediation waste, hazardous constituents, leachate, contaminated run-off, or hazardous remediation waste decomposition products to the groundwater or surface waters or to the atmosphere in accordance 40 CFR 264.110.

The Permittee shall close the CAMU by constructing two on-site containment units (Western and Eastern) for final disposal of on-site remediation wastes. The Western and Eastern containment units shall be constructed with a leachate collection and removal system, a perimeter cutoff wall, and composite cover in accordance with the requirements specified below and in the State of Michigan Act 64 Post-Closure Operating License.

a. Requirements For Containment Units (Western and Eastern)

(1) Design and Location of Containment Units

The Permittee shall construct two on-site containment units (Western and Eastern) within the CAMU boundary for final disposal of on-site remediation wastes. The Western containment unit shall be located in the area presently occupied by Disposal Area D and the North Lagoon. The Eastern containment unit shall be located in the area presently occupied by Disposal Areas A, B, C (includes the Polishing Lagoon), and a portion of the Process Canal. The location of the Western and Eastern containment units shall be as shown in Attachment II (Plate B) to this post-closure permit.

The Permittee shall construct the Western and Eastern containment units with a leachate collection and removal system, a perimeter cutoff wall, and a composite cover as specified below and in accordance with the State of Michigan Act 64 Post-Closure Operating License. In addition, the Permittee shall comply with the sequence for construction of each containment unit as specified in the State of Michigan Act 64 Post-Closure Operating License.

(a) Leachate Collection and Removal System (LCR)

After remediation wastes above the LCR zone have been solidified, as defined in the State of Michigan Act 64 Post-Closure Operating License, the Permittee shall install a leachate collection and removal system. The LCR system shall consist of an interior and perimeter collection system and a pressure conveyance system and be installed within the Western and Eastern containment units. The Permittee shall comply with the construction, operating, maintenance, monitoring, and reporting requirements for the leachate collection and removal system in accordance with this post-closure permit and the State of Michigan Act 64 Post-Closure Operating License. In addition, the Permittee shall manage leachate collected by the leachate collection and removal system within each containment unit in accordance with

the State of Michigan Act 64 Post-Closure Operating License.

(b) Cutoff Walls

As remediation wastes are solidified, the Permittee shall construct a cutoff wall around the perimeter of the Western and Eastern containment units. The Permittee shall comply with the construction, operating, maintenance, monitoring, and reporting requirements for the cutoff wall in accordance with this post-closure permit and the State of Michigan Act 64 Post-Closure Operating License.

(c) Composite Cover

After all treated remediation wastes have been placed into the containment units, the Permittee shall install a composite cover. The composite cover shall consist of a low permeability layer, a drainage layer, and a vegetated topsoil cover and be installed over the Western and Eastern containment units. The Permittee shall comply with the construction, maintenance, monitoring, and reporting requirements for the composite cover in accordance with the requirements of this post-closure permit and the State of Michigan Act 64 Post-Closure Operating License.

(2) Waste Identification and Disposal Capacity

The Western and Eastern containment units shall have a total disposal capacity of approximately 1,407,000 cubic yards or 873 acre-feet. These units shall contain approximately one million cubic yards of treated electroplating sludge (F006 waste) and contaminated soils from Disposal Areas A, B, C (includes Polishing Lagoon), Area D, D-North, D-West, North Lagoon, North Intake Canal, West Marsh, and the Process Canal. Remediation wastes from the Former West Lagoon, as discussed in Post-Closure Permit Condition IV.C.3.b., may also be placed in the Western or Eastern containment units. In addition, remediation wastes from SWMUs identified in Condition IV.D. may be placed into the containment units provided that the Regional Administrator makes a determination that remediation wastes can be placed into the containment units and approval is given in accordance with applicable law including 40 CFR 264.552. Other types of remediation wastes that may be placed into the units include drilling muds, demolition debris, and soils excavated during construction of the perimeter cutoff walls.

b. Confirmatory Sampling

The Permittee shall perform confirmatory sampling in areas outside the containment units, as shown in Attachment II (Plate B), where remediation wastes have been removed. The areas subject to confirmatory sampling include Disposal Areas D-North, D-West, North Intake Canal, West Marsh, and the western portion of the Process Canal. In addition, the Permittee shall sample the areas previously located within the CAMU boundary but not within the containment units. These areas include the Former West Lagoon and the area occupied by the Wastewater Treatment Plant. Since the Former West Lagoon has not been "clean closed" under current RCRA regulations, the Permittee shall comply with the sampling requirements for the Former West Lagoon as specified in the State of Michigan Act 64 Post-Closure Operating License. The Permittee shall ensure that the remaining soils in areas outside the containment units meet the cleanup levels specified in the State of Michigan Act 64 Post-Closure Operating License.

c. Decontamination

The Permittee shall properly dispose of or decontaminate all structures, equipment, tanks (i.e., generator accumulation tanks), and soils contaminated with hazardous remediation wastes after closure in accordance with the State of Michigan Act 64 Post-Closure Operating License.

4. Post-Closure Care

After completion of closure activities specified in Condition IV.C.3. above, the Permittee shall perform post-closure care of the Western and Eastern containment units for 30 years after closure unless the post-closure care period is shortened or extended under 40 CFR 264.117. The post-closure care requirements necessary to protect human health and the environment include performing groundwater monitoring and monitoring and maintaining the final composite cover, leachate collection and removal system, and the cutoff wall. The Permittee shall comply with the post-closure care groundwater monitoring, maintenance, and reporting requirements specified in this post-closure permit and the State of Michigan Act 64 Post-Closure Operating License.

a. Monitoring and Maintenance

The Permittee shall perform post-closure monitoring and maintenance of the Western and Eastern containment units to ensure integrity of the leachate collection and removal system, perimeter cutoff wall, and final composite cover in accordance with the activities and frequencies specified in the State of Michigan Act 64 Operating License.

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d. Requirements For Sediment Containment Unit (SCU)

The Permittee may construct the SCU within the CAMU boundary for on-site disposal of PCB-contaminated River Raisin Sediments, identified in Condition IV.D., and other materials generated as a result of the U.S. EPA Superfund program's cleanup of the River Raisin Hot Spot Area and associated on-land sewers and impacted areas at the facility. This cleanup activity is authorized in an Administrative Consent Order between the Permittee and U.S. EPA Superfund program.

(1) Design and Location of SCU

The SCU shall be located and constructed within the CAMU in accordance with the SCU design plans and specifications, approved by the State of Michigan on June 7, 1996, and contained in Attachment 6 of State of Michigan's Part 111 Post-Closure Operating License.

b. Groundwater Monitoring

The Permittee shall conduct groundwater monitoring to monitor groundwater quality and groundwater flow around the Western and Eastern containment units. The Permittee shall conduct groundwater monitoring in accordance with the sampling frequency, methods, and reporting requirements specified in the State of Michigan Act 64 Post-Closure Operating License.

D. IDENTIFICATION OF SWMUs

A RCRA Facility Assessment (RFA), consisting of a record review, site visit, and a sampling visit, was conducted at the Ford Motor Company, Monroe Stamping Plant in 1987. Twenty-one Solid Waste Management Units (SWMUs) were identified during the RFA. Ten of the twenty-one SWMUs will be remediated using the CAMU as described in Condition IV.C. of this post-closure permit. The remaining 11 SWMUs will be investigated in accordance with the corrective action activities specified in Condition IV.G. below.

The 10 SWMUs that will be remediated using the CAMU are as follows: Disposal Areas A, B, C (includes the Polishing Lagoon), Area D, D-North, D-West, North Lagoon, Process Canal, and the Former West Lagoon. Since these SWMUs will be remediated using the CAMU under the requirements of this post-closure permit, the Permittee is not required to conduct a corrective action investigation at these 10 SWMUs under Post-Closure Permit Condition IV.G. at this time.

The remaining SWMUs will be investigated in accordance with the corrective action activities specified under Post-Closure Permit Condition IV.G. The 11 SWMUs are as follows: salaried parking lot; coal pile; former coal pile; rifle range area; demolition disposal area; empty drum storage area; former drum storage area; current drum storage area; filter press area; dead tree area; and the NPDES outfall 002. Although not listed in the RFA, the River Raisin sediments have been identified as an Area of Concern (AOC) which is subject to corrective action under Post-Closure Permit Condition IV.G. An AOC is an area or unit that does not meet the definition of a SWMU but may have released or have the potential to release hazardous constituents to the environment. However, since the River Raisin Sediments are currently being investigated under the U.S. EPA Superfund program, the Permittee is not required to perform corrective action investigations under Post-Closure Permit Condition IV.G. for this SWMU at this time.

The location of the 11 SWMUs and the River Raisin sediments can be found in Attachment II (Plate C) to this post-closure permit. A description of the SWMUs and the results of sampling during the RFA is provided below.

<u>SWMU #</u>	<u>SWMU Identification</u>	<u>SWMU Description and RFA Sampling Results</u>
1	Salaried Parking Lot	A 200 ft. by 300 ft. asphalt parking lot, constructed in 1971, with a 6-inch base reported to be composed of a mixture of F006 hazardous waste sludge and fly ash. Sampling indicated the presence of heavy metals in soil.
2	Coal Pile	A 175 ft. by 400 ft. area adjacent to the River Raisin and Dead Tree Area which is no longer used for coal storage. Previous coal piles were stored in this area with no containment or liners. Sampling in this area indicates the presence of heavy metals in soil.
3	Former Coal Pile	A 150 ft. by 400 ft. area adjacent to the Raisin River which is no longer used for coal storage. Coal residue is present in soils. No soil samples were taken during the RFA.
4	Rifle Range Area	A 34 ft. by 48 ft. area near the Raisin River and East Marsh. Reportedly, F006 hazardous waste sludge was stored in this area before it was removed and filled in with clay. Sampling indicates the presence of heavy metals in soil.
5	Demolition Disposal Area	A 50 ft. by 1000 ft. area along the River Raisin shoreline previously used to store demolition debris for erosion protection. Visual evidence of oil-like materials in this area was reported in the RFA. No soil samples were taken during the RFA.
6	Empty Drum Storage Area	A 39 ft. by 63 ft. area previously used for the storage of drums containing waste oil, solvents, paint wastes, and diesel fuel. Visual evidence of black-stained concrete and staining of adjacent soils was reported in the RFA. Sampling indicates the presence of heavy metal and organics in soils.

<u>SWMU #</u>	<u>SWMU Identification</u>	<u>SWMU Description and RFA Sampling Results</u>
7	Former Drum Storage Area	A 27 ft. by 51 ft. area previously used for less than 90-day storage of compactor waste, oil and coil spring dust, and slag. Oily waste from this area has been drained via a sump to storage tanks. No sampling was taken during the RFA.
8	Current Drum Storage Area	Area is presently used for less than 90 day storage of oily wastes, compactor waste, coil spring dust, and slag. This area has been active since 1987. No soil samples were taken during the RFA.
9	Filter Press Area	Area located within the wastewater treatment plant used for sludge dewatering. Visual evidence of staining in this area was reported in the RFA. Sampling indicates the presence of heavy metals and organics in soil.
10	Dead Tree Area	A 100 ft. by 585 ft. area adjacent to the River Raisin containing dead trees. Natural depressions in this area containing coal, construction debris, and fine-grained oily material were reported in the RFA. No soil samples were taken during the RFA.
11	NPDES Outfall 002	Used for the discharge of treated wastewater into the River Raisin. No sediment samples were taken during the RFA.

<u>AOC #</u>	<u>AOC Identification</u>	<u>AOC Description</u>
1	River Raisin Sediments	Sediments near Ford's two NPDES Outfall pipes contaminated with metals and polychlorinated biphenyls. Sediment investigation and potential removal actions currently being conducted under U.S. EPA's Superfund program.

E. NEWLY IDENTIFIED SWMUs OR RELEASES

1. General Information

The Permittee shall notify the Regional Administrator, within 30 days of discovery, of the following information requirements for any new SWMU identified at the facility, in accordance with 40 CFR 270.14(d):

- a. The location of the unit on the site topographic map;
- b. Designation of the type of unit;
- c. General dimensions and structural description (supply any available drawings);
- d. When the unit was operated; and
- e. Specifications of all waste(s) that have been managed at the unit.

2. Release Information

The Permittee must submit to the Regional Administrator, within 30 days of discovery, all available information pertaining to any release of hazardous waste(s) or hazardous constituent(s) from any new or existing SWMU.

F. CORRECTIVE ACTION FOR NEWLY IDENTIFIED SWMUs AND RELEASES

The Regional Administrator will review the information provided in Condition IV.E. above, and may as necessary require further investigations or corrective measures. The Permittee shall submit a written RCRA Facility Investigation Workplan to the Regional Administrator within (90) days after written notification by the Regional Administrator that further investigation is necessary.

G. CORRECTIVE ACTION ACTIVITIES

1. Release Assessment (RA)

The Permittee shall conduct an RA to document the absence or presence and nature and extent of hazardous waste(s) or hazardous constituents(s) from all SWMUs identified in Condition IV.D. above except for AOC #1. The major tasks and required submittal dates for the RA are shown below. Additional tasks and associated submittal dates may also be specified in the Schedule of Compliance (Post-Closure Permit Condition VII). The scope of work for each of the tasks can be found in Attachment i. (RCRA Corrective Action Plan).

a. RA Workplan

The Permittee shall submit a written RA Workplan to the Regional Administrator within (90) days after the effective date of this post-closure permit.

The Regional Administrator will approve, modify and approve, or disapprove, and provide comments on the Workplan in writing to the Permittee. Within (60) days of receipt of such comments, the Permittee must modify the Workplan, so as to reflect the changes required in the Regional Administrator's comments, or submit a new workplan for the Regional Administrator's approval. The RA Workplan, as approved or as modified and approved, becomes an enforceable condition of this post-closure permit.

b. RA Implementation

Within (30) days of the Regional Administrator's written approval of the RA Workplan, the Permittee shall implement the workplan according to the terms and schedule in the approved RA Workplan.

c. RA Final Report

Within (60) days after the completion of the RA, the Permittee shall submit an RA Final Report to the Regional Administrator. The RA Final Report shall describe the procedures, methods, and results of the RA. The Final Report must contain adequate information to support further corrective action decisions at the facility.

After the Permittee submits the RA Final Report, the Regional Administrator shall either approve or disapprove the Report in writing. If the Regional Administrator disapproves the Report, the Regional Administrator shall notify the Permittee in writing of the deficiencies and specify a due date for submittal of a revised Report. The RA Final Report, as approved, becomes an enforceable condition of this post-closure permit.

2. RCRA Facility Investigation (RFI)

If the Regional Administrator determines, based on the results of the RA and other relevant information, that an RFI is necessary, the Regional Administrator will notify the Permittee in writing that the Permittee shall conduct an RFI. The purpose of the RFI is to evaluate thoroughly the nature and extent of the release of hazardous waste(s) and hazardous constituent(s) from all applicable SWMUs identified in Condition IV.D. or as identified by the Regional Administrator. The major tasks and required submittal dates are shown below. Additional tasks and associated submittal dates may also be specified in the Schedule of Compliance (Post-Closure Permit Condition VII.). The scope of work for

each of the tasks is found in Attachment I. (RCRA Corrective Action Plan).

a. RFI Workplan

The Permittee shall submit a written RFI Workplan to the Regional Administrator within (90) days from the notification of the requirement to conduct an RFI.

The Regional Administrator will approve, modify and approve, or disapprove, and provide comments on the Workplan in writing to the Permittee. Within (60) days of receipt of such comments, the Permittee must modify the Workplan, so as to reflect the changes required in the Regional Administrator's comments, or submit a new workplan for the Regional Administrator's approval. The RFI Workplan, as approved or as modified and approved, becomes an enforceable condition of this post-closure permit.

b. RFI Implementation

Within (30) days of the Regional Administrator's written approval of the RFI Workplan, the Permittee shall implement the RFI Workplan according to the terms and schedule in the approved RFI Workplan.

c. RFI Final Report

Within (60) days after the completion of the RFI, the Permittee shall submit an RFI Final Report to the Regional Administrator. The RFI Final Report shall describe the procedures, methods, and results of the RFI. The Final Report must contain adequate information to support further corrective action decisions at the facility.

After the Permittee submits the RFI Final Report, the Regional Administrator shall either approve or disapprove the Report in writing. If the Regional Administrator disapproves the Report, the Regional Administrator shall notify the Permittee in writing of the deficiencies and specify a due date for submittal of a revised Report. The RFI Final Report, as approved, becomes an enforceable condition of this post-closure permit.

3. Determination of No Further Action

The Regional Administrator will determine, based on the results of the RA or RFI, whether corrective measures are necessary. If the Regional Administrator determines that corrective measures are not necessary, no further action will be required at that time.

a. Periodic Monitoring

A determination of no further action shall not preclude the Regional Administrator from requiring continued or periodic monitoring of air, soil, ground water, or surface water, if necessary to protect human health and the environment, when site-specific circumstances indicate that potential or actual releases of hazardous waste(s) including hazardous constituents are likely to occur.

b. Further Investigations

A determination of no further action shall not preclude the Regional Administrator from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates that a release or likelihood of a release from a SWMU at the facility is likely to pose a threat to human health or the environment. Additionally, the Regional Administrator may determine that there is insufficient information on which to base a determination, and may require the Permittee to perform additional investigations as needed to generate the needed information.

4. Corrective Measures Study (CMS)

If the Regional Administrator determines, based on the results of the RA, RFI and other relevant information, that corrective measures are necessary, the Regional Administrator will notify the Permittee in writing that the Permittee shall conduct a CMS. The purpose of the CMS will be to develop and evaluate the corrective action alternative(s) and to outline one or more alternative corrective measure(s) which will satisfy the performance objectives specified by the Regional Administrator. The major tasks and required submittal dates are shown below. Additional tasks and associated submittal dates may also be specified in the Schedule of Compliance (Post-Closure Permit Condition VII.). The Scope of Work for each of the tasks is found in Attachment I.

a. CMS Workplan

The Permittee shall submit a written CMS Workplan to the Regional Administrator within (90) days from the notification of the requirement to conduct a CMS.

The Regional Administrator will approve, modify and approve, or disapprove and provide comments on the CMS Workplan in writing to the Permittee. Within (60) days of receipt of such comments, the Permittee must modify the Workplan, so as to reflect the changes required in the Regional Administrator's comments, or submit a new plan for the Regional Administrator's approval. The CMS Workplan,

as approved or as modified and approved, becomes an enforceable condition of this post-closure permit.

b. CMS Workplan Implementation

Within (30) days of the Regional Administrator's written approval of the CMS Workplan, the Permittee shall implement the CMS Workplan according to the terms and schedule in the approved CMS Workplan.

c. CMS Final Report

Within (90) days after the completion of the CMS, the Permittee shall submit a CMS Final Report to the Regional Administrator. The CMS Final Report shall summarize the results of the investigations for each remedy studied and must include an evaluation of each remedial alternative.

After the Permittee submits the CMS Final Report, the Regional Administrator shall either approve or disapprove the Report in writing. If the Regional Administrator disapproves the Report, the Regional Administrator shall notify the Permittee in writing of the deficiencies and specify a due date for submittal of a revised Report. The CMS Final Report, as approved, becomes an enforceable condition of this post-closure permit.

5. Corrective Measures Implementation (CMI)

Based on the results of the CMS, the Regional Administrator shall select one or more of the Corrective Measures in the CMS, and shall notify the Permittee in writing of the decision. The Regional Administrator's selection will be based on the corrective measures' long-term reliability and effectiveness, short-term effectiveness, implementability, cost, reduction of toxicity, mobility, or volume.

a. Permit Modification

The Regional Administrator will initiate a major permit modification, as provided by 40 CFR 270.41, to require implementation of the corrective measure(s) selected.

b. Financial Assurance

As part of the permit modification of this permit to incorporate CMI, the Permittee shall provide financial assurance in the amount specified by the Regional Administrator for necessary corrective action activities as required by 40 CFR 264.101(b) and (c).

H. ECOLOGICAL ASSESSMENT

The Permittee shall submit to the Regional Administrator a Preliminary Ecological Assessment Report within 90 days after the effective date of this post-closure permit. The report shall be based on existing data and limited field work describing the environmental systems that are susceptible to contaminant exposure from the facility. The Permittee's report shall include the information specified in Section I of Attachment IV. (Ecological Assessment Plan).

Within 60 days of the Regional Administrator's written approval of the Preliminary Ecological Assessment Report, the Permittee shall submit a Draft Ecological Assessment Report which will include the information specified in Section III of Attachment IV.

The Regional Administrator will approve, modify and approve, or disapprove and provide comments on the Draft Ecological Assessment Report in writing to the Permittee. Within 30 days of receipt of such comments, the Permittee must modify the Draft Ecological Assessment Report, so as to reflect the changes required in the Regional Administrator's comments and submit a Final Ecological Assessment Report. The Final Report must contain adequate information to support further corrective action decisions at the facility.

I. DISPUTE RESOLUTION

1. If the Permittee disagrees, in whole or in part, with the U.S. EPA's disapproval or modification of any submission required by Condition IV.G. of the post-closure permit, the Permittee shall notify the U.S. EPA of its objections by providing the Region 5 Associate Division Director, Waste Management Division, Office of RCRA, with a written statement of position within 14 days of receipt of the U.S. EPA's disapproval or modification. The Permittee's statement of position shall set forth the specific matters in dispute, the position that the Permittee asserts should be adopted as consistent with the requirements of this post-closure permit, the basis for the Permittee's position, and shall include any supporting documentation.
2. The U.S. EPA and the Permittee shall have an additional 14 days from the U.S. EPA's receipt of the Permittee's statement of position to meet or confer to attempt to resolve the dispute. If agreement is reached, the Permittee shall submit a revised submission, if necessary, and shall implement the submission in accordance with such agreement.
3. If the U.S. EPA and the Permittee are not able to reach agreement within the 14-day period, the Regional Administrator, Region 5, or his or her delegate will thereafter issue a written decision resolving the dispute which shall become an enforceable condition of this post-closure permit, and the Permittee shall comply with the terms and conditions of the U.S. EPA's decision resolving the dispute.

4. Notwithstanding the invocation of this dispute resolution procedure, the Permittee shall proceed to take any action required by those portions of the modified and approved submission that the U.S. EPA determines are not substantially affected by the dispute according to the schedule contained in the submission.

V. TOXICITY CHARACTERISTIC

A. WASTE RESTRICTIONS

The Permittee is prohibited from accepting, storing, treating, or disposing of TC wastes from off-site sources.

B. WASTE CHARACTERIZATION

The Permittee must use the Toxicity Characteristic Leaching Procedure (TCLP) (Appendix II of 40 CFR Part 261), or use knowledge of the waste to determine whether a waste exhibits the characteristic of toxicity, as defined in 40 CFR 261.24. Use of the TCLP does not exempt the Permittee from also using the Extraction Procedure (EP) toxicity test if required by the State license conditions.

VI. ENDANGERED SPECIES ACT REQUIREMENTS

A. ENDANGERED SPECIES ACT COMPLIANCE

The Permittee shall comply with the requirements under Section 7 (a) and 7 (c) of the Endangered Species Act in accordance with the conditions specified in this post-closure permit. The conditions required by this post-closure permit include conducting a Biological Assessment (BA) and performing protective measures for the bald eagle pair which is known to be present at the facility. The purpose of the BA is to ensure that post-closure permit activities do not jeopardize the continued existence of any Federal or State proposed, listed, or candidate endangered or threatened species or adversely affect its critical habitat.

The requirements for the BA and Protective Measures Plan for the bald eagle can be found in Attachment V. to this post-closure permit. Additional requirements and associated submittal dates may also be specified in the Schedule of Compliance (Post-Closure Permit Condition VII).

I. Biological Assessment (BA)

Within 90 days of the effective date of this post-closure permit and prior to initiation of closure activities specified under the post-closure permit, the Permittee shall submit a BA. The purpose of the BA is to identify any Federal or State proposed, listed, or candidate endangered or threatened species at the facility which may be affected by post-closure permit activities.

The Regional Administrator will approve, modify and approve, or disapprove and provide comments on the BA in writing to the Permittee. Within 60 days of receipt of such comments, the Permittee must modify the BA to reflect changes required in the Regional Administrator's comments. The BA, as approved or as modified and approved, becomes an enforceable condition of this post-closure permit.

If, based on the results of the BA, the Regional Administrator determines that post-closure permit activities will likely affect species identified in the BA, then the Regional Administrator will enter into formal consultation with the U.S. Fish and Wildlife Service.

2. Protective Measures Plan (PMP)

Within 30 days of the effective date of this post-closure permit and prior to initiation of closure activities specified in this post-closure permit, the Permittee shall implement the PMP for the bald eagle. The purpose of the PMP is to ensure that the bald eagle pair at the facility is protected during the post-closure permit activities.

3. Bald Eagle Management Plan

By November 1, 1995, the Permittee shall submit a bald eagle management plan. The Regional Administrator will approve, modify and approve, or disapprove and provide comments on the Bald Eagle Management Plan in writing to the Permittee. Within 30 days of receipt of such comments, the Permittee must modify the Plan to reflect changes required in the Regional Administrator's comments. The Bald Eagle Management Plan, as approved or as modified and approved, becomes an enforceable condition of this post-closure permit.

B. NEWLY IDENTIFIED FEDERAL OR STATE SPECIES

If the post-closure activities specified in the post-closure permit are modified or if new information becomes available that indicates additional Federal or State proposed, listed, or candidate endangered or threatened species are present and/or affected, the Permittee shall notify the U.S. EPA and the U.S. Fish and Wildlife within 30 days of discovery.

If the Regional Administrator determines that a BA is necessary, the Regional Administrator will notify the Permittee in writing within 90 days of receipt of notification of discovery.

C. REPORTING REQUIREMENTS

1. Annual Report

The Permittee shall submit a signed annual report to the U.S. EPA which

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contains an updated list of Federal and State proposed, listed, or candidate endangered or threatened species which may be present at the facility. The Permittee may obtain a list of species by placing a request with the U.S. Fish and Wildlife Service, United States Department of the Interior, East Lansing Field Office, 1405 South Harrison Road, East Lansing, Michigan 48823.

VII. SCHEDULE OF COMPLIANCE

The required submittal dates for corrective action submittals including the Release Assessment (RA), RCRA Facility Investigation (RFI), Corrective Measures Study (CMS); Ecological Assessment; and Biological Assessment (BA) and Protective Measures Plan (PMP) are shown below.

A. RA (Attachment I)

Facility Submittal	Due Date
RA Workplan	Within 90 days of after effective date of post-closure permit
Modified or New RA Workplan, if necessary	Within 60 days of receipt of Regional Administrator's comments
RA Implementation	Within 30 days after Regional Administrator's written approval
RA Final Report	Within 60 days after completion of RA

B. RFI (Attachment I), if required

Facility Submittal	Due Date
RFI Workplan	Within 90 days of the notification of the requirement
Modified or New RFI Workplan, if necessary	Within 60 days of receipt of Regional Administrator's comments
RFI Implementation	Within 30 days of the Regional Administrator's written approval
RFI Final Report	Within 60 days after completion of RFI
Progress Reports	Bimonthly

C. CMS (Attachment I), if required

Facility Submittal	Due Date
CMS Workplan	Within 90 days of notification of requirement
Modified or New CMS Workplan, if necessary	Within 60 days of receipt of Regional Administrator's comments
CMS Workplan Implementation	Within 30 days of Regional Administrator's written approval
CMS Final Report	Within 90 days after completion of CMS
Progress Reports	Bimonthly

D. Ecological Assessment (Attachment IV)

Facility Submittal	Due Date
Preliminary Ecological Assessment	Within 90 days after effective date of post-closure permit
Draft Ecological Assessment	Within 60 days of Regional Administrator's written approval
Final Ecological Assessment	Within 30 days of receipt of Regional Administrator's comments

E. BA and PMP (Attachment V)

Facility Submittal	Due Date
BA Report	Within 90 days of effective date of post-closure permit and prior to initiation of post-closure activities
Modified or New BA, if necessary	Within 60 days of receipt of Regional Administrator's comments
PMP Implementation	Within 30 days of the effective date of post-closure permit and prior to initiation of closure activities
Bald Eagle Management Plan	November 1, 1995
Modified or New Bald Eagle Management Plan	Within 30 days of receipt of Regional Administrator's comments

Attachment I

RCRA Corrective Action Plan

RCRA CORRECTIVE ACTION PLAN
For
Ford Motor Company, Monroe Stamping Plant
Monroe, Michigan

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Corrective Action Scope of Work

The corrective action requirements for the Permittee are specified in Post-Closure Permit Condition IV. The corrective action for the facility includes discrete elements. The scope of work for each of the elements is specified below. All workplans and final reports are subject to approval by the U.S. EPA. Any of the information or documentation that has been submitted in the Post-Closure Permit Application may be incorporated by reference in the required workplans and reports.

I. Release Assessment (RA)

The purpose of the Release Assessment (RA) is to document the absence or presence and nature and extent of hazardous waste or hazardous constituents at each Solid Waste Management Unit identified in Post-Closure Permit Condition IV.D.

A. RA Workplan

The Permittee shall prepare a RA Workplan. During the RA Investigation, it may be necessary to revise the Workplan to increase or decrease the detail of information collected to accommodate site specific needs. The RA Workplan includes the following:

1. Project Management Plan

The Permittee shall prepare a Project Management Plan which shall include a discussion of the technical approach, schedules, and personnel. The Project Management Plan shall evaluate each SWMU based on its actual or potential threat to human health and the environment and prioritize the investigatory and/or remedial activities accordingly. The Project Management Plan shall also include a description of qualifications of personnel performing or directing the Release Assessment, including contractor personnel. This plan shall also document the overall management approach to the RA.

2. Data Collection Quality Assurance Plan

The Permittee shall prepare a plan to document all monitoring procedures including sampling, field measurements and sample analysis performed during the assessment to characterize the environmental setting, source and contamination, so as to ensure that all information, data and resulting decisions are technically sound, statistically valid, and properly documented. The Data Collection Quality Assurance Plan shall include, but not be limited to, the following:

a. Data Collection Strategy - This section shall include the

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level of precision and accuracy for all data (factors which should be considered include the environmental conditions at the time of sampling, number of sampling points, and the representatives of selected media and selected analytical parameters), a description of methods and procedures to assess the precision, accuracy and completeness of the measurement data, a description of the measures to be taken to assure that data generated by the Permittee and outside laboratories or consultants during the Release Assessment can be compared to each other.

- b. Sample Collection - This section shall include a discussion of; selecting appropriate sampling locations (depth, etc.), determining which media are to be sampled (e.g., groundwater, air, soil, sediment, etc.), determining which parameters are to be measured and where, selecting the frequency of sampling and length of sampling period, selecting the type of samples (e.g., composites versus grabs) and number of samples to be collected, measures to be taken to prevent contamination of the sampling equipment and cross contamination between sampling points, selecting appropriate sample containers, sample preservation, chain-of-custody (e.g., standardized field tracking reporting forms to establish sample custody in the field prior to and during shipment as well as prepared sample labels containing all information necessary for effective sample tracking), and documenting field sampling operations and procedures.
- c. Field Measurements - This section shall include a discussion of; selecting appropriate field measurements (locations, depth, etc.), measuring all necessary ancillary data, determining conditions under which field measurements should be conducted, determining which media are to be addressed by appropriate field measurements (e.g., groundwater, air, soil, sediment, etc.), determining which parameters are to be measured and where, selecting the frequency of field measurements and length of field measurements period, and documenting field measurements and procedures.
- d. Sample Analysis - This section shall specify chain-of-custody procedures, sample storage procedures and storage times; sample preparation methods; analytical procedures (i.e., scope and application of the procedure, sample matrix, potential interferences, precision and accuracy of the methodology, and method detection limits); calibration procedures and frequency; data reduction, validation and reporting; preventative maintenance procedures and schedules; corrective action (for laboratory problems); turnaround time; and internal quality control checks, laboratory performance and systems audits and frequency.

3. Data Management Plan

The Permittee shall develop and initiate a Data Management Plan to document and track assessment data and results. This plan shall identify and set up data documentation materials and procedures, project file requirements, and project-related progress reporting procedures and documents. The plan shall also provide the format to be used to present the raw data and conclusions of the assessment. The Data Management Plan shall include the following:

- a. Data Records - This section shall include; unique sample or field measurement code, sampling or field measurement location and sample or measurement type, sampling or field measurement raw data, laboratory analysis ID number, and result of analysis.
- b. Tabular Display - This section shall present; raw data, results from each medium or each constituent monitored, data reduction for statistical analysis, sorting of data by potential stratification factors (e.g., location, soil layer, topography), and summary data.
- c. Graphical Format - This section shall describe: sampling location and sampling grid; boundaries of sampling area, and areas where additional data are required; levels and extent of contamination at each sampling location; contamination levels, averages, and maxima; changes in concentration in relation to distance from the source, time, depth, or other parameters; and features affecting intramedia transport and potential receptors.

4. Health and Safety Plan

The Permittee's Release assessment Workplan shall include a Health and Safety Plan covering activities to be conducted during the assessment. This plan shall be consistent with all applicable U.S. EPA, OSHA, NIOSH, State and local requirements and regulations, and the conditions of this permit.

5. Release Assessment

The Permittee shall conduct the necessary assessments to document the absence or presence of hazardous wastes or hazardous constituents at SWMUs identified in Condition IV.D. of the post-closure permit. The assessments shall result in data of adequate technical quality to support the determination of whether there is a need to implement a RCRA Facility Investigation.

The Release Assessment activities shall follow the plans set forth in Part I.A. of this Scope of Work. All sampling and analysis

shall be conducted in accordance with the Data Collection Quality Assurance Plan. All sampling locations shall be documented in a log and identified on a detailed site map.

6. Assessment Analysis

The Permittee shall prepare an analysis and summary of all facility assessments and results. The objective of this element shall be to ensure that the assessment data are sufficient in quality and quantity to support the determination of whether it is necessary to implement an RFI.

The Permittee shall analyze all release assessment data and prepare a report on the type and known extent of contamination at each solid waste management unit. The report shall describe the contamination (qualitative/quantitative) in relation to background levels indicative of the area.

7. Determination of Further Investigation

Based on the data analysis from the Release Assessment, the Permittee shall provide recommendations on which solid waste management units require further investigation under Part II.A. of this Scope of Work.

II. RCRA Facility Investigation (RFI) (if required)

If the Regional Administrator determines that additional investigation is necessary, the Permittee shall prepare a RFI Workplan. The purpose of the RFI is to evaluate thoroughly the nature and extent of the release of hazardous waste and hazardous constituents and to gather additional screening data to support the corrective measures study.

A. RFI Workplan

The Permittee shall prepare an RFI Workplan. During the RFI, it may be necessary to revise the Workplan to increase or decrease the detail of information collected to accommodate site specific needs. The RFI Workplan includes the following:

1. Facility Background

The Permittee's RFI Workplan shall summarize existing information about the facility that will aid in determining the nature and extent of contamination at the facility and beyond the facility boundary. This information shall be used to develop a conceptual model that is a narrative and graphical description of the site, the pollutants and the behavior of the pollutants at the site. The model will help to visualize where the problem may exist and facilitate the selection of corrective measures, including the

remediation of existing contamination and the prevention of future contamination. The conceptual model shall address the release source(s), the release mechanism(s), specific contaminants and the distribution of contaminants, pathways of contamination migration, actual or potential receptors including on-site and adjacent ecosystems, and exposure routes. This model may be modified as additional information is collected.

The Permittee shall describe the following specific information:

- a. A summary of the facility's regional location, pertinent boundary features, drainage basin and general facility physiography.
- b. A summary of the environmental setting at and adjacent to the facility, including geology, hydrogeology, hydrology, and meteorology, wildlife and vegetative community.
- c. Maps depicting the following:
 - (1) General geographic location;
 - (2) Property lines, with the owners of all adjacent property clearly indicated;
 - (3) Topography and surface drainage depicting all soil profiles, waterways, wetlands, floodplains, water features, drainage patterns, and surface water areas;
 - (4) All tanks, buildings, utilities, paved areas, easements, rights-of-way, and other features;
 - (5) All solid or hazardous waste treatment, storage or disposal units active after November 19, 1980;
 - (6) All known past solid or hazardous waste treatment, storage or disposal areas regardless of their dates of operation;
 - (7) All known past and present product and waste underground tanks or piping;
 - (8) Surrounding land uses;
 - (9) The location of all nearby production, recovery, and groundwater monitoring wells; and
 - (10) Terrestrial habitat cover - types (i.e., vegetation communities) with emphasis on locating natural (undisturbed) areas.

- (11) Wildlife nesting and foraging locations for locally "uncommon" mammals, birds, fish, benthos, etc. Threatened and endangered species possibly on or near the site should be identified as early as possible.

All maps shall be consistent with the requirements of 40 CFR 270.14 and be of sufficient detail and accuracy to locate and report all current and future work performed at the site.

- d. A history and description of ownership and operation, solid and hazardous waste generation, treatment, storage and disposal activities at the facility;
- e. A summary of past permits requested and/or received, any enforcement actions and the subsequent responses and a list of documents and studies prepared for the facility along with a brief summary of their findings;
- f. A summary of all possible source areas of contamination. At a minimum, this should include all regulated units, solid waste management units identified in Condition III.C. of the facility's permit, any additional solid waste management units, spill areas, and other suspected source areas of contamination including any observed effects to biota (i.e., fish kills, stressed vegetation, or other obvious impacts).

For each area the Permittee shall identify the following:

- (1) Location of unit/area;
- (2) Quantities of solid and hazardous wastes;
- (3) Hazardous waste or constituents, to the extent known;
- (4) Approximate dates or periods of past spills, identification of the materials spilled, the amount spilled, the location, and a description of the response actions, including any inspection reports or technical reports generated as a result of the spill;
- (5) Available monitoring data and qualitative information on locations and levels of contamination at the facility; and
- (6) Habitats and species (including threatened and endangered species) potentially exposed to contaminants, and any known or observed effects of site contaminants on biota, such as fish kills or other obvious impacts. Habitat description should be based on available information and

a field reconnaissance by a trained ecologist. Experts on local flora and fauna should also be consulted.

- g. A report on all interim measures which were or are being undertaken at the facility. This shall include:
- (1) Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long term solution at the facility;
 - (2) Design, construction, operation, and maintenance requirements;
 - (3) Schedules for design, construction and monitoring; and
 - (4) Schedule for progress reports.

2. Potential Corrective Measure Technologies

Based on the existing information in Part II.A.1. above, the Permittee's RFI Workplan shall identify:

- a. The potential corrective measure technologies that may be used at the facility or beyond the boundaries of the facility to respond to releases of hazardous waste or hazardous constituents at or from the facility; and
- b. Any field, laboratory, bench-scale or pilot-scale data that needs to be collected in the RFI to facilitate the evaluation and selection of the final corrective measure(s), if any, for releases at or from the facility (e.g., compatibility of waste and construction materials, information to evaluate effectiveness, treatability of waste, etc.).

3. Project Management Plan

The Permittee's RFI Workplan shall include a Project Management Plan which shall document the overall management approach to the RFI. The plan shall include:

- a. A discussion of the technical approach;
- b. Schedules of activities;
- c. A description of the qualifications of personnel directing the RFI, including contractor personnel; and
- d. Provision for submittal of periodic (e.g., monthly or quarterly progress reports, which shall, at a minimum,

include:

- (1) A description and estimate of the percentage of the RFI completed;
- (2) Summaries of all findings;
- (3) Summaries of all changes made in the RFI during the reporting period;
- (4) Summaries of all contacts with the public regarding the RFI;
- (5) Summaries of all problems or potential problems encountered during the reporting period;
- (6) Actions being taken to rectify problems;
- (7) Changes in personnel during the reporting period;
- (8) Projected work for the next reporting period; and
- (9) Copies of daily reports, inspection reports, laboratory and monitoring data, etc.

4. Facility Investigation Plan

The Permittee's RFI Workplan shall include a Facility Investigation Plan which discusses those investigations necessary to: characterize the environmental setting at the facility; define the source; define the degree and extent of contamination; and identify actual or potential receptors.

This information shall be used to verify and further develop the conceptual model of the nature and extent of contamination at the facility.

The investigation should also result in data of adequate technical quality to support the development and evaluation of the corrective measures alternative(s). The Permittee shall collect information to supplement and verify the existing information described in Part II.A.1.b. above on the environmental setting at the facility. The Permittee shall characterize the following:

a. Environmental Setting Investigation

(1) Hydrogeology

The Permittee shall conduct a program to evaluate hydrogeologic conditions at the facility. This program

shall provide the following information, as appropriate:

- (a) A description of the regional and facility-specific geologic and hydrogeologic characteristics affecting groundwater flow beneath the site, including:
 - (i) Regional and facility-specific stratigraphy;
 - (ii) Structural geology: description of local and regional structural features;
 - (iii) Depositional history;
 - (iv) Identification and characterization of areas and amount of recharge and discharge;
 - (v) Regional and facility-specific groundwater flow patterns; and
 - (vi) Temporal variations in the groundwater flow regime.
- (b) An analysis of any topographic features that might influence the groundwater flow system;
- (c) Based on field data, tests, and cores, a representative and accurate classification and description of the hydrogeologic units which may be part of the migration pathways at the facility, including:
 - (i) Hydraulic conductivity (horizontal and vertical) and porosity (total and effective);
 - (ii) Lithology, grain size, sorting, degree of cementation;
 - (iii) An interpretation of hydraulic interconnection between saturated zones; and
 - (iv) The attenuation capacity and mechanisms of the natural earth materials.
- (d) Based on field studies and cores, structural geology and hydrogeologic cross sections showing the extent of hydrogeologic units which may be part of the migration pathways, identifying:
 - (i) Sand and gravel deposits in unconsolidated deposits;

- (ii) Zones of fracturing or channeling in consolidated or unconsolidated deposits;
 - (iii) Zones of higher or lower permeability that might direct or restrict the flow of contaminants;
 - (iv) Aquifers: A geologic formation, group of formations, or part of a formation capable of yielding a significant amount of groundwater to wells or springs; and
 - (v) Water-bearing zones above the first confining layer that may serve as a pathway for contaminant migration including perched zones of saturation.
- (e) Based on data obtained from groundwater monitoring wells and piezometers installed upgradient and downgradient of the potential contaminant source, a representative description of water level or fluid pressure monitoring including:
- (i) Water level contour and/or potentiometric maps;
 - (ii) Hydrologic cross sections showing vertical gradients;
 - (iii) The flow system, including the vertical and horizontal components of flow; and
 - (iv) Any temporal changes in hydraulic gradients due to seasonal or other influences.
- (f) A description of manmade influences that may affect the hydrogeology of the site, identifying:
- (i) Active and inactive local water supply and production wells with an approximate schedule of pumping; and
 - (ii) Manmade hydraulic structures (pipelines, french drains, ditches, unlined ponds, septic tanks, NPDES outfalls, etc.).

(2) Soils

The Permittee shall conduct a program to characterize the soil and rock units above the water table in the vicinity of the contaminant release(s). Such characterization shall consider, but not be limited to, the following

information, as appropriate:

- (a) SCS soil classification;
- (b) Surface soil distribution;
- (c) Soil profile, including ASTM classification of soils;
- (d) Transects of soil stratigraphy;
- (e) Hydraulic conductivity (saturated and unsaturated);
- (f) Relative permeability;
- (g) Bulk density;
- (h) Porosity;
- (i) Soil sorptive capacity;
- (j) Cation exchange capacity (CEC);
- (k) Soil organic content;
- (l) Soil pH;
- (m) Particle size distribution;
- (n) Depth of water table;
- (o) Moisture content;
- (p) Effect of stratification on unsaturated flow;
- (q) Infiltration;
- (r) Evapotranspiration;
- (s) Storage capacity;
- (t) Vertical flow rate; and
- (u) Mineral content.

(3) Surface Water and Sediment

The Permittee shall conduct a program to characterize the surface water bodies in the vicinity of the facility that may be affected by releases from the facility. Such characterization shall include, but not be limited to, the following activities and information:

- (a) Description of the temporal and permanent surface water bodies including:
 - (i) For lakes and estuaries: location, elevation, surface area, inflow, outflow, depth, temperature or chemical stratification and volume;
 - (ii) For streams, ditches, drains, swamps and channels: location, elevation, flow, velocity, depth, width, seasonal fluctuations, and flooding tendencies;
 - (iii) Drainage patterns; and
 - (iv) Evapotranspiration.

- (b) Description of the chemistry of the natural surface water and sediments; this includes determining the pH, total dissolved solids, total suspended solids, biological oxygen demand, alkalinity, conductivity, dissolved oxygen profiles, nutrients, chemical oxygen demand, total organic carbon, specific contaminant concentrations, etc.; and
- (c) Description of sediment characteristics including the disposition area, thickness profile, physical and chemical parameters (e.g., grain size, density, organic carbon content, ion exchange capacity, pH, etc.), and specific contaminant concentrations.

(4) Air

The Permittee shall provide information characterizing the climate in the vicinity of the facility. Such information shall include, but not be limited to, as appropriate:

- (a) A description of the following parameters:
 - (i) Annual and monthly rainfall averages;
 - (ii) Monthly temperature averages and extremes;
 - (iii) Wind speed and direction;
 - (iv) Relative humidity and dew point;
 - (v) Atmospheric pressure;
 - (vi) Evaporation data;
 - (vii) Development of inversions; and
 - (viii) Climate extremes that have been known to occur in the vicinity of the facility, and the frequency of occurrence.
- (b) A description of topographic and manmade features which affect air flow and emission patterns, including:
 - (i) Ridges, hills or mountain areas;
 - (ii) Canyons or valleys;
 - (iii) Surface water bodies;

- (iv) Wind breaks and forests; and
- (v) Buildings.

b. Source/Waste Characterization

The Permittee shall collect analytical data to characterize the source(s) where wastes have been placed, and to describe the characteristics of the wastes. This shall include qualification of the following specific characteristics at each source area, as each source becomes identified during the facility investigation:

(1) Unit/Disposal Area Characteristics:

- (a) Location of unit/disposal area;
- (b) Type of unit/disposal area;
- (c) Design features;
- (d) Operating practices (past and present);
- (e) Period of operation;
- (f) Age of unit/disposal area;
- (g) General physical conditions; and
- (h) Method used to close the unit.

(2) Waste Characteristics:

- (a) Type of waste placed in the units;
 - (i) Hazardous classification;
 - (ii) Quantity; and
 - (iii) Chemical composition.
- (b) Physical and chemical characteristics;
 - (i) Physical form (solid, liquid, gas);
 - (ii) Physical description;
 - (iii) Temperature;
 - (iv) pH;
 - (v) General chemical class (e.g., acid, solvent);
 - (vi) Molecular weight;
 - (vii) Density;

- (viii) Boiling point;
- (ix) Viscosity;
- (x) Solubility in water;
- (xi) Cohesiveness of the waste;
- (xii) Vapor pressure; and
- (xiii) Flash point.

(c) Migration and dispersal characteristics of the waste.

- (i) Sorption;
- (ii) Biodegradability, bioconcentration;
- (iii) Photodegradation rates;
- (iv) Hydrolysis rates; and
- (v) Chemical transformations.

The Permittee shall document the procedures used in making the above determinations.

c. Contamination Characterization

The Permittee shall collect analytical data on groundwater, soils, surface water, sediment, subsurface gas and air contamination in the vicinity of the facility. These data shall be sufficient to define the extent, origin, direction, and rate of movement of plumes of contamination. Data shall include time and location of sampling, media samples, concentrations found, conditions during sampling, and the identity of the individuals performing the sampling and analysis. In developing strategies for collecting these under Part I.B.4. a and b above, the Permittee shall address the following types of contamination at the facility, as appropriate:

(1) Groundwater Contamination

The Permittee shall conduct a Groundwater Investigation to characterize any plumes of contamination at or originating from the facility. This investigation shall at a minimum provide the following information:

- (a) A description of the horizontal and vertical extent of any immiscible or dissolved plume(s) originating from the facility;
- (b) The horizontal and vertical direction of contaminant movement;
- (c) The velocity of contaminant movement;

- (d) The horizontal and vertical concentration profiles of Appendix IX constituents in the plume(s);
- (e) An evaluation of factors influencing the plume movement; and
- (f) An extrapolation of future contaminant movement.

The Permittee shall document the procedures used in making the above determinations.

(2) Soil Contamination

The Permittee shall conduct an investigation to characterize the contamination of the soil and rock units above the water table in the vicinity of the contaminant release. The investigation shall include the following information:

- (a) A description of the vertical and horizontal extent of contamination;
- (b) A description of contaminant and soil chemical properties within the source area and contaminant plume. This includes physical and chemical properties that might affect contaminant migration and transformation;
- (c) Specific contaminant concentrations;
- (d) The velocity and direction of contaminant movement; and
- (e) An extrapolation of future contaminant movement.

The Permittee shall document the procedures used in making the above determinations.

(3) Surface Water and Sediment Contamination

The Permittee shall conduct a surface water investigation to characterize contamination in surface water bodies resulting from contaminant releases at the facility. The investigation shall include, but not be limited to, the following:

- (a) A description of the horizontal and vertical extent of any immiscible or dissolved plume(s) originating from the facility and the extent of contamination in underlying sediments;

- (b) The horizontal and vertical direction of contaminant movement;
- (c) The contaminant velocity;
- (d) An evaluation of the physical, chemical, and biological factors influencing contaminant movement;
- (e) An extrapolation of future contaminant movement taking into account times of flood; and
- (f) A description of the chemistry of the contaminated surface waters and sediments. This includes determining the pH, total dissolved solids, specific contaminant concentrations, etc.

The Permittee shall document the procedures used to make the above determinations.

(4) Air Contamination

The Permittee shall conduct an investigation to characterize the particulate and gaseous contaminants released into the atmosphere. This investigation shall provide the following information:

- (a) A description of the horizontal and vertical direction and velocity of contaminant movement;
- (b) The rate and amount of release; and
- (c) The chemical and physical composition of the contaminants released, including horizontal and vertical concentration profiles.

(5) Subsurface Gas Contamination

The Permittee shall conduct an investigation to characterize subsurface gases emitted from buried hazardous waste and hazardous constituents in the groundwater. This investigation shall include the following information:

- (a) A description of the horizontal and vertical extent of subsurface gases mitigation;
- (b) The chemical composition of the gases being emitted;
- (c) The rate, amount, and density of the gases being emitted; and

- (d) Horizontal and vertical concentration profiles of the subsurface gases emitted.

The Permittee shall document the procedures used in making the above determinations.

d. Potential Receptors

The Permittee shall collect data describing the human populations and environmental systems that are susceptible to contaminant exposure from the facility. Chemical analyses of biological samples may be needed. Data on observable effects in ecosystems or from bioassays may also be needed. The following characteristics shall be identified, as appropriate:

- (1) Local uses and possible future uses of groundwater:
 - (a) Type of use (e.g., municipal or residential drinking water source, industrial, etc.); and
 - (b) Location of groundwater users including wells and discharge areas.
- (2) Local uses and possible future uses of surface waters draining the facility:
 - (a) Domestic and municipal;
 - (b) Recreational;
 - (c) Agricultural;
 - (d) Industrial; and
 - (e) Environmental.
- (3) Human use of, or access to, the facility and adjacent lands, including, but not limited to:
 - (a) Recreation;
 - (b) Agriculture;
 - (c) Residential;
 - (d) Commercial;
 - (e) Zoning; and

- (f) Relationship between population locations and prevailing wind direction.
- (4) A description of the biota in surface water bodies including benthic macroinvertebrates and fish communities on, adjacent to, or affected by the facility. The aquatic biota expected in these water bodies in the absence of site-related contamination, based on physical habitat characteristics, should also be described.
- (5) A description of terrestrial habitats on or potentially affected by the site and a description of potential terrestrial animal receptors seen or expected in those habitats, including, birds, mammals, amphibians, and reptiles.
- (6) A demographic profile of the people who use or have access to the facility and adjacent land, including, but not be limited to: age; sex; and sensitive subgroups.
- (7) A description of any endangered or threatened species near the facility.

5. Quality Assurance Project Plan

The Permittee shall prepare a plan to document all monitoring procedures; sampling, field measurements and sample analysis performed during the investigation to characterize the environmental setting, source, and contamination, so as to ensure that all information, data and resulting decisions are technically sound, statistically valid, and properly documented.

- a. For convenience in review, it is a requirement that Quality Assurance Project Plans (QAPJP) are to be prepared using the document control format consisting of the following information, placed in the upper right-hand corner of each document page:

- Project Name;
- Section Number;
- Revision Number;
- Date; and
- Section Page Number.

The Permittee can see the upper right-hand corner on each page of the guidance documents, QAMS-005/80 and "Content Requirements for the Preparation of RCRA QAPjPs," for an example of this format. This format provides for easy change of individual QAPjP element pages without rewriting the entire document.

A QAPjP meeting must be held prior to the preparation of the QAPjP and its supporting documents. During the meeting, U.S. EPA representatives will provide QAPjP preparation guidance and lead a discussion on the specific sampling and analysis issues for the project.

Four copies of the QAPjP must be submitted initially and for each required revision.

- b. The QAPjP must include, but not be limited to, a discussion addressing each of the following items:

(1) TITLE PAGE AND QAPjP APPROVAL

The title page of the QAPjP should contain, at a minimum, provisions for approval by the following parties:

- (a) The U.S. EPA Region 5 Permit Writer;
- (b) The U.S. EPA Regional Quality Assurance Manager, Monitoring and Quality Assurance Branch (MQAB);
- (c) The responsible Project Officer (PO) and Quality Assurance (QA) Officer for the contract engineering firm; and
- (d) Subcontractors, as appropriate (i.e., laboratories, sampling, subcontractors, drillers, etc.).

After final approval of the QAPjP by the U.S. EPA Regional Quality Assurance Manager, the Project Coordinator will determine the distribution, and the responsibility for this distribution, of QAPjP copies to each person/organization having a major responsibility for the proposed environmental measurements. This includes, but is not limited to, contractors, subcontractors, and each laboratory.

(2) TABLE OF CONTENTS

The Table of Contents shall address each of the following items:

- (a) Introduction;
- (b) A serial listing of each of the 16 QAPjP elements shall be provided. Each section, subsection and page shall be clearly labelled and numbered properly;
- (c) A listing of any appendices which are required to augment the QAPjP as presented (i.e., SOPs, summaries of past data, etc.) shall be provided;
- (d) Following the list of appendices, a listing of any tables and figures which are required to augment the QAPjP shall be provided; and
- (e) At the end of the Table of Contents, a listing of the Quality Assurance Section (QAS) officials and other individuals receiving official copies of the QAPjP and any subsequent revisions shall be provided.

(3) PROJECT DESCRIPTION

The purpose of the project description is to:

- Define the objectives (goal of the remedial activity);
- Describe how the project will be designed to obtain the information needed for these objectives; and
- Define the scope of the QAPjP for reviewers.

The project description element should include the following:

(a) Introduction

A succinct description of the project including a brief statement addressing the phase(s) of the work and general objectives of the investigation;

(b) Site Description

A description of site-specific features including location, size, borders, important physical features, topographic, geological and hydrogeologic information, etc., separate paragraphs/sections shall be used to clearly address each of these

items;

(c) Site History or Background

Chronological history of the site which led to its RCRA status; documentation of known chemicals dumped on site; summary of any previous sampling and analysis efforts; data with overview of these results or copy of previous data reports for the site can be appended to the QAPjP; a summary table of past data along with the analytical methodologies used and their method detection limits (if available) should be provided;

(d) Target Compounds

Discussion of important site contaminants or target compounds, including required detection limits (RDLs) for RFI/CMS;

(e) Project Objectives

The project objectives element should include the following:

- (i) Specific objectives;
- (ii) The intended data usages; and

The brief statement outlining the usages of all data including any data generated from field screening and or/field measurements. These may include, but not be limited to the following:

- Qualitative or semi-quantitative analyses for selection of sample and/or sampling locations;
- Future enforcement actions;
- Data for remedial action alternatives;
- Determination of hazardous waste characteristics for remedial removals;
- Protection of public health; and
- Definition of extent of environmental contamination.

(iii) Data Quality Objective (DQO) summaries from RCRA DQO preparation guidance.

(f) Sample Network and Rationale

A succinct description of the monitoring (sampling) network design and rationale. This may be referenced to readily available work and sampling plans. The following are minimum requirements:

- (i) Diagrams or site maps of sampling locations;
- (ii) Short rationale of selected sampling locations; and
- (iii) Summary table listing matrices, parameters, and their frequency of collection.

NOTE: Parameters shall include both laboratory and field parameters. The field parameters may include the following field activities if they are applicable:

- Any field screening (i.e., screening of volatile organics using HNu, OVA, etc.);
- Any field measurements (i.e., pH, conductance, temperature, etc.); and
- Hydrogeologic investigations (i.e., soil permeability, particle size, etc.).

Sample matrices and parameters are best listed in groups for a remedial activity site as follows:

- On-site contaminated soils, sludges, barrels, liquids, or sediments. These types of sampling and analyses are often done to determine disposal methods;
- Ambient monitoring of air, groundwater, surface water, soils, drinking water, river sediments, fish;

Specifications of filtered or unfiltered sample aliquot for groundwater and surface water must be included as part of the definition of parameters. These types of analyses usually are intended to measure the extent of

environmental contamination and to assess public health risk; and

- Regulatory requirements: Appendix IX analyses may be required for certain projects.

(g) Project Schedule

A description of dates anticipated for start, milestones, and completion of the project and monitoring activities. A milestone table or a bar chart consisting of project tasks and time lines is appropriate.

(4) PROJECT ORGANIZATION AND RESPONSIBILITY

This element identifies key personnel organizations that are necessary for the remedial activity and apprises them of their responsibilities.

(a) Management Responsibilities

Operational responsibilities showing how execution and direct management of the technical and administrative aspects of this project have been assigned as shown in the following Table.

Quality Assurance Organization

Tasks	Responsible Organization/Personnel
Final review/approval of QAPJP	U.S. EPA Region 5 PO and U.S. EPA Region 5QA Officer
QA review and approval of reports, SOPs, and field activities; audits of reports, procedures, and activities for identifying, controlling nonconformance for corrective actions	Permittee's Contractor QA Manager
Evidence audits of field records	Permittee's Contractor
Data assessment	Permittee's Contractor

Tasks	Responsible Organization/Personnel
Performance and system audit of laboratories	U.S. EPA Region 5 Central Regional Laboratory (CRL)
Analysis	Contract Laboratory
Performance and system audits of field activities	U.S. EPA Region 5 CRL and/or Central District Office (CDO)
Approval of QA Program and laboratory test procedures	U.S. EPA Region 5 QA Section, U.S. EPA Region 5 CRL

Include a table, chart or figure showing the project organization and line authority for the Quality Assurance Organization described above.

(5) QUALITY ASSURANCE OBJECTIVES FOR MEASUREMENT DATA IN TERMS OF PRECISION, ACCURACY, COMPLETENESS, REPRESENTATIVENESS AND COMPARABILITY

Clearly describe the quality assurance (QA) objectives of the project in terms of precision, accuracy, completeness, representativeness and comparability for both field activities (sampling, measurements and screening) and laboratory analyses, including the project required acceptance limits and means to achieve these QA objectives.

NOTE: Trip blanks are required at a frequency of one per cooler in which aqueous matrix VOC samples are shipped. Field blanks are required for all aqueous matrix parameters at a frequency of one for every ten or fewer investigative samples. Field duplicates are required at the same frequency as field blanks, while accounting for all parameters and matrices. These field QC samples must be treated as regular investigative samples concerning sample volume, containers and preservation. Field duplicates must not be composited prior to placing them in the sample containers.

(6) SAMPLING PROCEDURES

If a separate sampling plan (SP) will be written, then

the sampling procedures shall be referenced to the SP. Otherwise, the detailed sampling procedures shall be described under this QAPjP element. The description of sampling procedures shall include the following:

- (a) Detailed procedures, criteria, or guidelines used for sampling point selection;
- (b) Detailed procedures, criteria, or guidelines used for collecting background samples, if any; detailed procedures for preparing composite samples shall also be properly described if composite samples are to be collected;
- (c) Detailed procedures for sample collection of each sample matrix or parameters;
- (d) Detailed procedures for sample packaging, handling and shipment, including time consideration (i.e., shipped daily by overnight courier) and field filtration requirements and procedures;
- (e) Samples containers, reagents, preservatives, and holding time requirements - a table is appropriate;
- (f) Special conditions for the preparation of sampling containers, and time requirements - a table is appropriate;
- (g) Chain-of-custody procedures - including an acceptable sample numbering system;
- (h) Detailed procedures for preparing/collecting trip blank samples, field blank samples and field duplicate samples;
- (i) Documentation of sampling activities - including forms, notebooks, bound logbook and procedures to record sample history, sampling conditions, etc., and analyses to be taken;
- (j) Summary of sampling and analysis - using a table is appropriate;
- (k) For ground and surface waters, both filtered and unfiltered samples must be submitted for analysis of dissolved and total metals, respectively; and
- (l) Compositing of any samples is prohibited.

(7) SAMPLE CUSTODY

Sample custody consists of three major elements, namely the chain-of-custody procedure for field sampling and measurements; chain-of-custody procedure for laboratory analysis; and the final evidence file. All of these three elements shall be addressed clearly, and separately:

- (a) Chain-of-custody procedure for field activities, including sampling, field measurement and screening.
- (b) Chain-of-custody procedure for laboratory activities, including sample receiving, log-in, storage, and tracking of custody-transfer during sample preparation and analysis, etc.
- (c) The final evidence file, including the description of file contents and specifying file custodian.

(8) CALIBRATION PROCEDURES AND FREQUENCY

Describe the calibration procedures and their frequency for both field and laboratory instruments. The description shall include the following:

(a) Field Instruments

- (i) Initial calibration, including multilevel calibration for determination of usable range;
- (ii) Continuing calibration check and acceptable control limits; and
- (iii) Conditions to trigger recalibration.

(b) Laboratory Instruments

- (i) Initial calibration for each instrument;
- (ii) Initial calibration verification;
- (iii) Continuing calibration check; and
- (iv) Conditions to trigger the recalibration.

(9) ANALYTICAL PROCEDURES

SW-846 (third edition) methods are preferred. Other U.S. EPA methods from the Clean Water Act (CWA),

Superfund Contract Laboratory Program (CLP) Clean Air Act Program, or Safe Drinking Water Act (SDWA) are acceptable when appropriate for the constituent of interest. The following shall be properly addressed:

- (a) For SW-846 (third edition) analytical method, the method for analysis (by number). For parameters to be analyzed by methods other than those found in SW-846, the following shall be provided:
 - (1) For nonstandard methods, an appropriate Standard Operating Procedure (SOP) shall be included as an integrated part of the QAPJP; and
 - (2) For modified SW-846 or other standard methods (i.e., Appendix IX or site-specific contaminants), the analytical procedure to be used shall be documented in the format of an SOP.
- (b) For U.S. EPA or other standard methods not found in SW-846, a reference to the method manual and procedure number(s) is appropriate.
- (c) Chain-of-custody procedure to be used/followed by analyst of the laboratory performing the analytical services shall be clearly addressed or properly referenced, provided the procedure is described elsewhere in the QAPJP.

(10) INTERNAL QUALITY CONTROL CHECKS

All specific quality control check methods to be followed for both laboratory and field activities should be described or properly referenced. Items to be considered include the following:

- (a) Field Activities (Measurements and Screening)
 - (i) Continuing calibration check;
 - (ii) Replicate analyses;
 - (iii) Spike sample analyses;
 - (iv) Blank (trip blank, field blank, etc.);
 - (v) Quality Control (QC) samples;

- (vi) Zero and Span gases (i.e., air monitoring); and
- (vii) Calibration standards and devices, etc.

(b) Laboratory Analyses

- (i) Method blanks;
- (ii) Reagent/preparation blanks;
- (iii) Matrix spike and matrix spike duplicates;
- (iv) Calibration standards;
- (v) Internal standards;
- (vi) Surrogate standards;
- (vii) Continuing calibration check;
- (viii) Calibration check standards, etc.; and
- (ix) Laboratory duplicate/replicate analysis, etc.

(11) DATA REDUCTION, VALIDATION AND REPORTING

- (a) Methods to be used for reducing both field and laboratory data. For instance, reducing data from instrument printout to final reporting units using a calibration curve, and an average response factor or updated response factor, etc., shall be described.
- (b) Criteria/guidelines/procedures to be used for data validation shall be described. This function must be performed independently of the laboratory.
- (c) The data reporting format including all forms and reporting units shall be described. The description shall include the listing of data package contents (deliverables from the laboratory).

(12) PERFORMANCE AND SYSTEM AUDITS

This QAPjP element describes the procedures and mechanisms used to ensure that the sampling and analysis are performed per specifications of the QAPjP and that measurement data meet project requirements. A description of both the internal and external audits for the field activity as well as laboratory analysis shall be provided to address this QAPjP element.

(a) Internal Audits which can be implemented by contractor's site manager and/or QA officer. The description provided for this QAPjP element shall address the following:

- The responsible party for these audits shall be identified;
- The frequency of these audits to be conducted shall be specified; and
- Methods/procedures to be used for conducting these audits shall be described.

(b) External Audits

The external audits of laboratories selected for a specific monitoring activity are EPA's responsibility.

- Laboratory Scientific Support Section (LSSS), Central Regional Laboratory (CRL), Region 5 is responsible for these audits.

(13) PREVENTIVE MAINTENANCE

Preventive maintenance procedures to be used for both field and laboratory instruments shall be described. A table showing the type of maintenance to be performed and the frequency is appropriate.

For the maintenance of laboratory instruments used for the analysis of SW-846 methods, the analytical methods can be referenced.

(14) SPECIFIC ROUTINE PROCEDURES USED TO ASSESS DATA PRECISION, ACCURACY, AND COMPLETENESS

The procedures/equations to be used to aid in assessing the accuracy and precision of analytical data, and completeness of data collection shall be clearly documented or properly referenced.

(15) CORRECTIVE ACTION

In order to address this QAPjP element the following shall be provided:

- (a) The mechanism of triggering the initiation of limitation of corrective actions;
- (b) The proper procedures to be used for initiating, development, approval and implementation of the corrective actions. Parties for initiating, approval and implementation of the corrective actions shall be identified; and
- (c) Alternate corrective actions to be taken.

(16) QUALITY ASSURANCE REPORTS TO MANAGEMENT

Quality assurance reports shall be submitted on a periodic basis to management. This shall be done to ensure that problems, if any, identified during the sampling and/or analysis are investigated, and corrective actions are properly taken. For a very simple project, a final report may be substituted for QA reports.

6. RFI Report

The Permittee's RFI Workplan shall include an outline of the contents of the RFI report. The RFI report shall include the following:

- a. A summary of all facility investigations conducted during the RFI;
- b. An analysis of all data developed during the RFI;
- c. A description of the nature and extent of contamination at the facility, including:
 - (1) The release source(s);
 - (2) The release mechanism(s);
 - (3) Specific contaminant concentrations and the distribution of contamination;
 - (4) Pathways of contamination migration; and
 - (5) Actual or potential receptors including exposure routes.
- d. Identification of all relevant and applicable standards, including background values, for the protection of human health and the environment, and comparison of those standards to the extent of contamination found at the facility; and
- e. Recommendation of which SWMUs require a Corrective Measure Study, and the identification of those corrective action alternatives that will be further investigated.

7. Health and Safety Plan

The Permittee's RFI Workplan shall include a Health and Safety Plan covering activities to be conducted during the RFI. This Plan shall be consistent with all applicable U.S. EPA, OSHA, NIOSH, State and local requirements and regulations, and the conditions of this Permit.

8. Community Relations Plan

The Permittee's RFI Workplan shall include a plan for dissemination of information to the public regarding investigation activities and results.

C. RFI Implementation

The Permittee shall conduct the RCRA Facility Investigation according to terms and schedules in the RFI Workplan, as approved by the Regional Administrator. The RFI Workplan shall include the information required in Part II.A. of this Scope of Work.

D. RFI Reporting Requirements

The Permittee shall prepare and submit RFI progress reports and a draft and final RFI report.

1. Progress Reports

The Permittee shall submit progress reports according to the requirements of Part II.A.3.d. of this Scope of Work and the Post-Closure Permit Schedule of Compliance (Condition VII).

2. Draft Report

The Permittee shall submit a final RFI report according to the requirements of Part II.A.6. of this Scope of Work and Post-Closure Permit Schedule of Compliance (Condition VII).

3. Final Report

The Permittee shall submit a final RFI report according to the requirements of Part II.A.6. of this Scope of Work and Post-Closure Permit Schedule of Compliance (Condition VII).

III. Corrective Measures Study (CMS) (if required)

The purpose of a CMS is to develop and evaluate remedial alternative(s) and recommend the remedy(ies) to be taken.

A. CMS Workplan

If required under Post-Closure Permit Condition IV.G.5, the Permittee shall prepare a CMS Workplan. The Permittee may elect either to screen a number of potential remedies prior to evaluating a smaller number of potential remedies or, based on justification and prior approval by the U.S. EPA, delete the screening step and proceed with evaluation of the expected remedy(ies), including any specified by U.S. EPA. The CMS Workplan includes the following:

1. Findings of the RCRA Facility Investigation

The Permittee's CMS Workplan shall summarize the findings of the RFI, highlighting the description of the nature and extent of contamination, and the identification of SWMUs requiring corrective measures. Any updates to facility conditions since the RFI was conducted, including implementation of interim measures, shall be included in this section of the workplan.

2. Target Cleanup Levels and Media Cleanup Standards

The Permittee's CMS Workplan shall propose site-specific target cleanup levels for the corrective measures. These target cleanup levels shall be based on information gathered during the RFI, from U.S. EPA guidance, the requirements of any applicable Federal standards for protection of human health and the environment.

The Permittee shall recommend final media cleanup standards when the final remedy is selected. If the media cleanup standards differ from the target cleanup levels, the Permittee shall document the reasons for recommendation of different standards.

3. Screening of Corrective Measures Technologies

The Permittee shall screen corrective measures technologies to eliminate those that may prove infeasible to implement, or that rely on technologies unlikely to or that do not achieve the media cleanup standards within a reasonable period of time. This screening process focuses on eliminating those technologies which have severe limitations for a given set of waste and site-specific conditions. The screening step may also eliminate technologies based on inherent technology limitations.

The Permittee's CMS Workplan shall document the reasons for eliminating any technology, based on the following criteria:

a. Site Characteristics:

Site data should be reviewed to identify conditions that may limit or promote the use of certain technologies.

Technologies whose use is clearly precluded by site characteristics should be eliminated from further consideration;

b. Waste Characteristics; and

Technologies clearly limited by waste characteristics should be eliminated from consideration;

c. Technology Limitations

During the screening process, the level of technological development, performance record, and inherent construction, operation, and maintenance problems should be identified for each technology considered. Technologies that are unreliable, perform poorly, or are not fully demonstrated may be eliminated in the screening process.

4. Identification of the Corrective Measures Alternative(s)

The Permittee's CMS Workplan shall identify the corrective measures alternative(s) based on the target cleanup levels and an analysis of available technologies. The Permittee shall rely on sound engineering practice to determine which of the previously identified technologies appear most suitable for the site. Technologies can be combined to form the overall corrective action alternative(s). The alternatives developed should represent a workable number of options that appear to adequately address all site problems and corrective action objectives. The Permittee shall document the reasons for excluding technologies that might be feasible alternatives.

5. Evaluation and Recommendation of the Corrective Measures Alternative(s)

The Permittee's CMS Workplan shall describe how each corrective measure alternative that passes through the initial screening process shall be evaluated. The evaluation shall be based on technical, environmental, human health and institutional concerns. The Permittee shall also develop cost estimates for each corrective measure.

a. Evaluation Criteria

The evaluation criteria shall include the following:

(1) Technical:

The Permittee shall evaluate each alternative based on performance, reliability, implementability and safety.

- (a) The Permittee shall evaluate performance based on the effectiveness and useful life of the measure:
- (i) Effectiveness shall be evaluated in terms of the ability to perform intended functions, such as containment, division, removal, destruction, or treatment. The effectiveness of each measure shall be determined either through design specifications or by performance evaluation. Any specific waste or site characteristics which could impede effectiveness shall be considered; and
 - (ii) Useful life is defined as the length of time the level of effectiveness can be maintained. Most corrective measure technologies deteriorate with time. Each measure shall be evaluated in terms of the projected service lives of its components.
- (b) The Permittee shall provide information on the reliability of each corrective measure including its operation and maintenance requirement and its demonstrated reliability:
- (i) Operation and maintenance requirements include the frequency and complexity of the operation and maintenance. Technologies requiring frequent or complex operation and maintenance should be regarded as less reliable. The availability of labor and materials to meet these requirements shall also be considered; and
 - (ii) Demonstrated reliability is a way of measuring the risk and effect of failure. The Permittee should evaluate the technology's reliability under analogous conditions, the flexibility to deal with uncontrollable changes at the site, and the impact on receptors of a failure.
- (c) The Permittee shall describe the implementability of each alternative, including the ease of installation and the time required to achieve a given level of response:
- (i) Constructability is determined by both internal and external facility conditions (e.g., location, depth to water table, availability of utilities, need for special permits, etc.).

The Permittee shall evaluate what measures will facilitate construction under these conditions; and

(ii) Time has two components that shall be addressed: the time it takes to implement a corrective measure, and the time it takes to see beneficial results.

(d) The Permittee shall evaluate each corrective measure alternative with regard to safety. This evaluation shall include threats to the safety of nearby communities and environments, as well as to workers during the implementation. Factors to consider are fire, explosion and exposure to hazardous substances.

(2) Environmental

The Permittee shall assess each alternative to determine its short- and long-term beneficial and adverse effects on the environment. Each alternative will be evaluated for its impact on habitat types and plant and animal receptors located in, adjacent to, or affected by the facility. Receptor impacts should include those occurring at the individual level (e.g., mortality, growth and reproductive impairments) and those occurring at higher levels of biological organization (i.e., at population, community, and ecosystem levels). The assessment should include proposed measures for mitigating adverse impacts.

(3) Human Health

The Permittee shall assess each alternative in terms of the extent to which it mitigates short- and long-term potential or actual exposure to any residual contamination and protects human health both during and after implementation of the corrective measure. Each alternative will be evaluated to determine the level of contaminants through various media, and the reduction over time. The residual levels from each alternative must be compared with target cleanup levels, including existing criteria, standards and guidelines acceptable to the U.S. EPA.

(4) Institutional

The Permittee shall assess relevant institutional needs for each alternative. Specifically, the effects of

Federal, State and local environmental and public health standards, regulations, guidance, advisories, ordinances, or community relations on the design, operations, and timing of each alternative.

b. Cost Estimate

The Permittee shall develop an estimate of the cost of each corrective measure alternative, and for all phases of the action. The cost estimate shall include both capital and operation and maintenance costs, as appropriate.

(1) Capital costs consist of direct (construction) and indirect (nonconstruction and overhead) costs.

(a) Direct capital costs include:

- (i) Construction costs: Materials, labor and equipment required to install the corrective measure;
- (ii) Equipment costs: Treatment, containment, disposal and/or service equipment necessary to implement the action;
- (iii) Land site development costs: Expenses associated with the purchase of land and development of existing property; and
- (iv) Buildings and service costs: Process and non-process buildings, utility connections, purchased services, and disposal costs.

(b) Indirect capital costs include:

- (i) Engineering expenses: Costs of administration, design, construction supervision, drafting, and testing of corrective measure alternatives;
- (ii) Legal fees and license or permit costs;
- (iii) Startup and shakedown costs; and
- (iv) Contingency allowances: Funds to cover costs resulting from unforeseen circumstances, such as adverse weather conditions, strikes, and inadequate facility characterization.

(2) Operation and maintenance costs are post-construction costs necessary to ensure continued effectiveness of a

corrective measure. The Permittee shall consider the following operation and maintenance cost components:

- (a) Operating labor costs: Wages, salaries, training, overhead, and fringe benefits associated with the labor necessary for continued operation;
- (b) Maintenance materials and labor costs: Costs for labor, parts, and other resources required for routine maintenance of facilities and equipment;
- (c) Auxiliary materials and energy: Costs of items such as chemicals, electricity, water and sewer service, and fuel;
- (d) Purchased services: Sampling costs, laboratory fees, and professional fees;
- (e) Disposal and treatment costs: Costs of transporting, treating and disposing of waste materials and residues;
- (f) Administrative costs;
- (g) Insurance, taxes and licensing costs; and
- (h) Other costs: Items that do not fit into any of the above categories.

c. Recommendation of the Corrective Measure Alternative(s)

The Permittee shall present a corrective measure alternative using technical, human health, and environmental criteria. This recommendation shall include summary tables which allow the alternative or alternatives to be understood easily. Tradeoffs among health risks, environmental effects, and other pertinent factors shall be highlighted. The U.S. EPA will select the corrective measure alternative or alternatives to be implemented based on the results of the Corrective Measure Study. At a minimum, the following criteria will be used to justify the final corrective measure or measures.

(1) Technical

- (a) Performance - corrective measure or measures which are most effective at performing their intended functions and maintaining the performance over extended periods of time will be given preference;
- (b) Reliability - corrective measure or measures which

do not require frequent or complex operation and maintenance activities and that have proven effective under waste and facility conditions similar to those anticipated will be given preference;

- (c) Implementability - corrective measure or measures which can be constructed and operating to reduce levels of contamination to attain or exceed applicable standards in the shortest period of time will be preferred; and
- (d) Safety - corrective measure or measures which pose the least threat to the safety of nearby residents and environments as well as workers during implementation will be preferred.

(2) Human Health

The corrective measure or measures must comply with existing U.S. EPA criteria, standards, or guidelines for the protection of human health. Corrective measures which provide the minimum level of exposure to contaminants and the maximum reduction in exposure with time are preferred.

(3) Environmental

~~The corrective measure or measures posing the least adverse impact (or greatest improvement) over the shortest period of time on the environment will be favored.~~

6. Reporting Requirements

- a. The Permittee's CMS Workplan shall include provisions for the submittal of periodic progress reports. These progress reports shall contain:
 - (1) A description and estimate of the percentage of the CMS completed;
 - (2) Summaries of all findings;
 - (3) Summaries of all contacts with representatives of the local community, public interest groups, or State government during the reporting period;
 - (4) Summaries of all problems or potential problems encountered during the reporting period;

- (5) Actions being taken to rectify problems;
 - (6) Changes in personnel during the reporting period; and
 - (7) Projected work for the next reporting period.
- b. The Permittee's CMS Workplan shall include an outline of the contents of the CMS report. The CMS report shall include the following:
- (1) An updated description of the findings of the RFI, highlighting the nature and extent of the contamination as documented by the RCRA Facility Investigation Report;
 - (2) Recommended target cleanup levels for corrective action for each SWMU, or group of SWMUs;
 - (3) A summary of the results of the screening of Corrective Measures Technologies;
 - (4) A description of the evaluation of corrective measure alternatives using the criteria in Section II.A.5. of this Scope of Work; this section shall include summary tables which allow the alternative(s) to be understood easily. Comparisons among health risks, environmental effects, and other pertinent factors among the alternatives evaluated shall be highlighted; information on all evaluated potential remedy(ies) shall be presented.
 - (5) A description and justification of the recommended remedy, including recommended media cleanup standards that can be achieved by the remedy;
 - (6) A description of design and implementation considerations for the recommended remedy(ies) including:
 - (a) Special technical problems;
 - (b) Additional engineering data required;
 - (c) Permits and regulatory requirements;
 - (d) Access, easements, rights-of-way;
 - (e) Health and safety requirements;
 - (f) Community relations activities; and
 - (g) Long-term monitoring requirements to assess

attainment of media cleanup standards (including ecological integrity).

- (7) A description of the cost estimates and schedules for implementing the recommended remedy(ies) including:
- (a) Capital cost estimates;
 - (b) Operation and maintenance cost estimates; and
 - (c) Project schedule for implementation.

7. Schedule for Completion of the CMS

The Permittee's CMS Workplan shall include a schedule for completion of all tasks described in Part III.A. of this Scope of Work.

B. CMS Implementation

The Permittee shall conduct the Corrective Measures Study according to the terms and schedules in the CMS Workplan, as approved by the Regional Administrator. The CMS Workplan shall include the information required in Part III.A. of this Scope of Work.

C. CMS Reporting Requirements

The Permittee shall prepare and submit CMS progress reports and a draft and final CMS report.

1. Progress Reports

The Permittee shall submit progress reports according to the requirements of Part III.A.6.a. of this Scope of Work and the Post-Closure Permit Schedule of Compliance.

2. Draft Report

The Permittee shall submit a draft CMS report according to the requirements of Part III.A.6.b. of this Scope of Work and the Post-Closure Permit Schedule of Compliance.

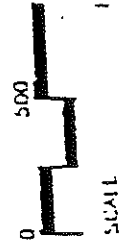
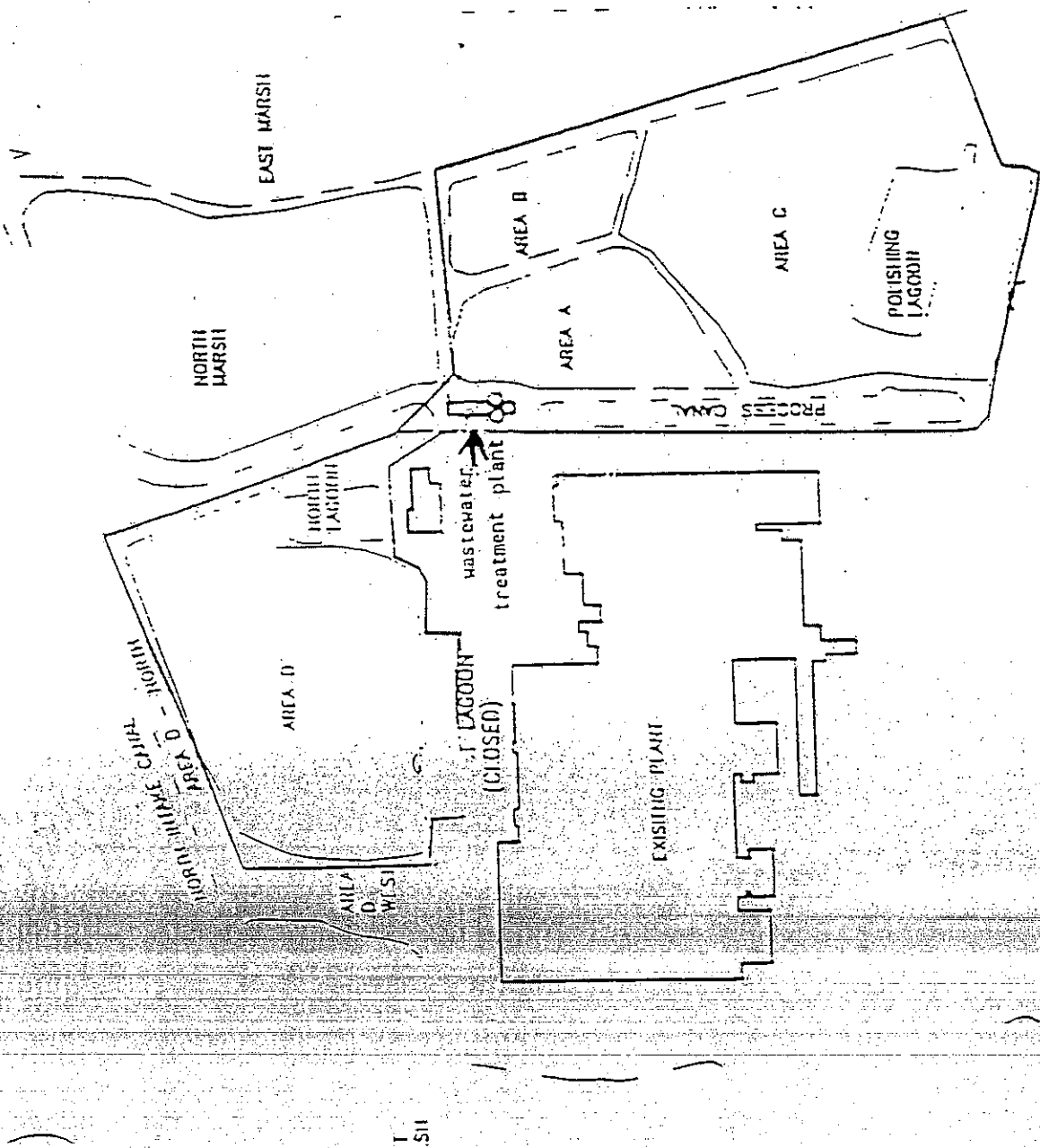
3. Final Report

The Permittee shall submit a final CMS report according to requirements of Part III.A.6.b. of this Scope of Work and the Post-Closure Permit Schedule of Compliance.

Attachment II
Facility Maps

LEGEND:

- CORRECTIVE ACTION MANAGEMENT UNIT BOUNDARY



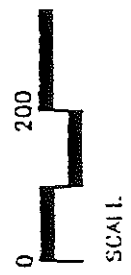
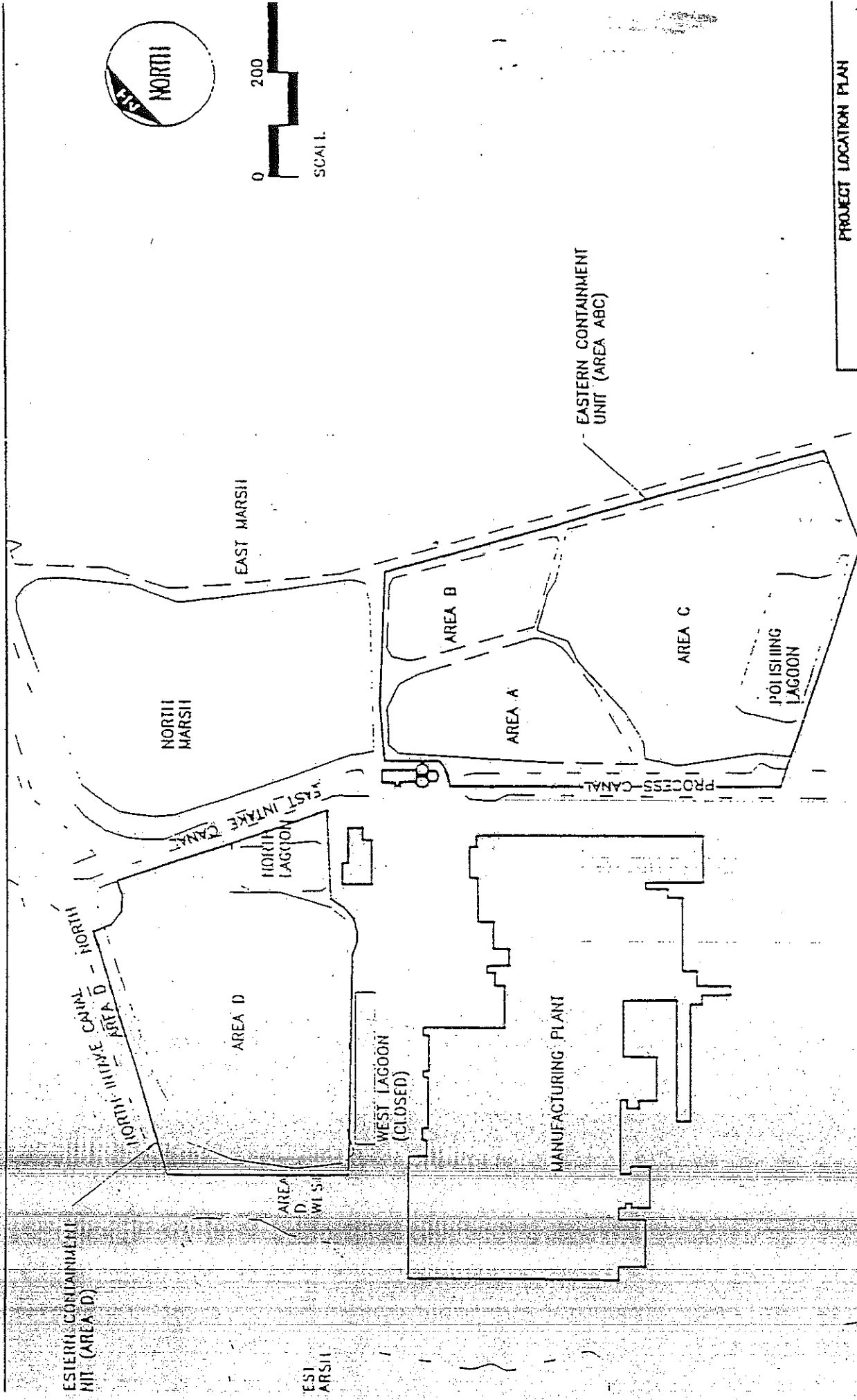
LOCATION PLAN

FORD MOTOR STAMPING PLANT
FORD, MICHIGAN

NTH CONSULTANTS, LTD.
Professional Engineering & Environmental Services
Westborough, MA, Michigan

PROJECT NO. 13-5004-KW	DRAWN BY KRII	DATE 11-10-94
CHECKED BY SII		CHECKED BY SII

Plate B: Western and Eastern Containment Unit Location Map



PROJECT LOCATION PLAN

CLOSURE OF SURFACE IMPROVEMENTS
 FORD MOHORE STAMPING PLANT
 MONROE, MICHIGAN

NTH CONSULTANTS, I.T.
 Professional Engineering & Environmental Service
 Farmington Hills, Michigan

PROJECT NO. 94-0001-04
 DRAWN BY: JG
 DATE: 02-17-94

RIVER RAISIN

LEGEND:

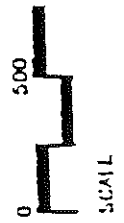
— CORRECTIVE ACTION MANAGEMENT UNIT BOUNDARY

SOLID WASTE MANAGEMENT UN

- 1 SALARIED PARKING LOT
- 2 COAL PILE
- 3 FORMER COAL PILE
- 4 RIFLE RANGE AREA
- 5 DEMOLITION DISPOSAL AREA
- 6 EMPTY DRUM STORAGE AREA
- 7 FORMER DRUM STORAGE AREA
- 8 CURRENT DRUM STORAGE AREA
- 9 FILTER PRESS AREA
- 10 DEAD TREE AREA
- 11 NPDES OUTFALL 002

AREA OF CONCERN(ADO):

- 1 RIVER RAISH SEDIMENTS



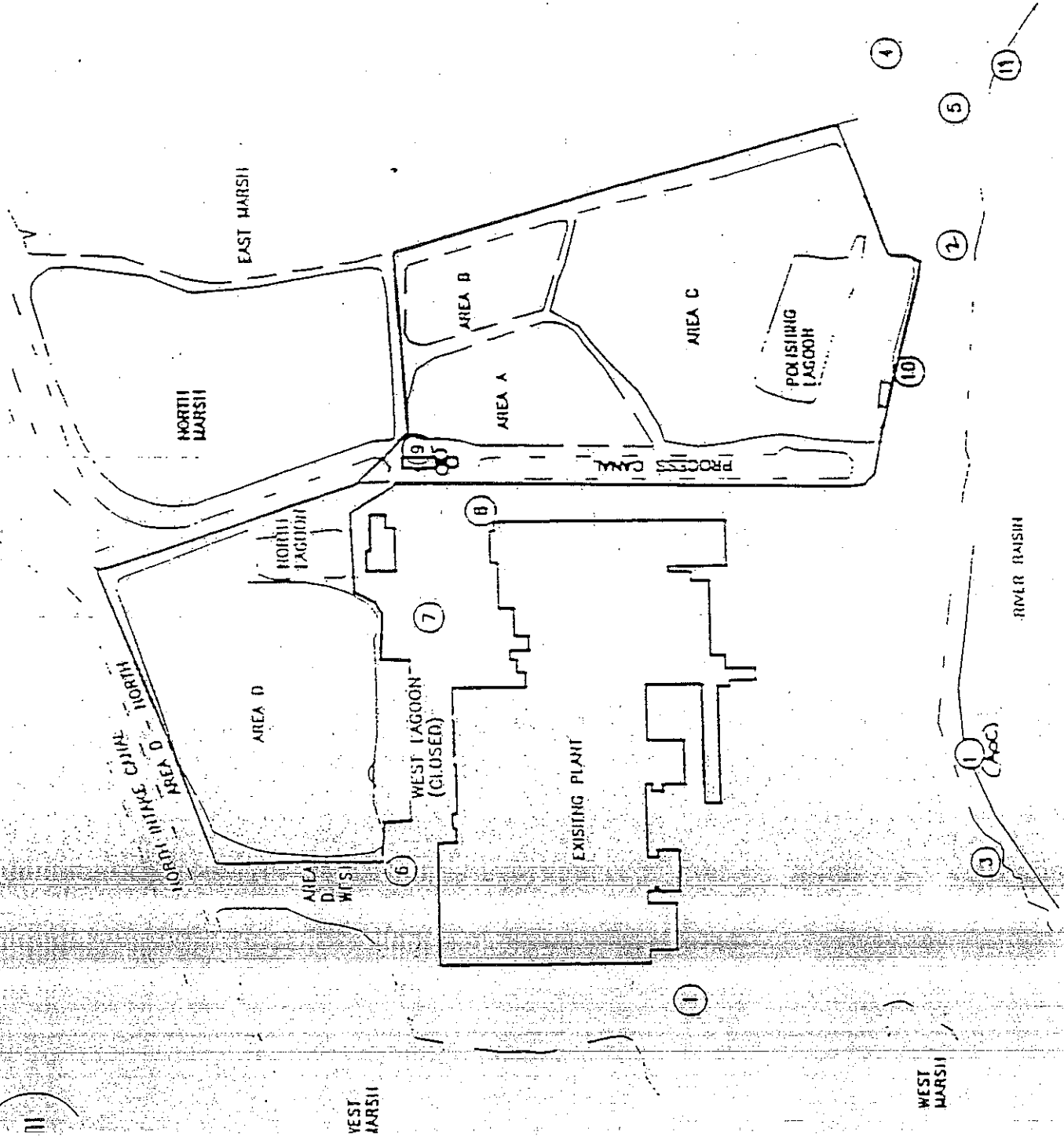
LOCATION PLAN

FORD MOTOR STAMPING PLANT
LAWRENCE, MICHIGAN



NTH CONSULTANTS, I.P.
Professional Engineering & Environmental Inc.
Farmington Hills, Michigan

PROJECT NO. _____ DATE: 11-10-04



Attachment III

Corrective Action Definitions

CORRECTIVE ACTION DEFINITIONS
FOR
Ford Motor Company, Monroe Stamping Plant
Monroe, Michigan

1. Facility: For the purpose of implementing corrective action under 40 CFR 264.101, all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. This definition also applies to facilities implementing corrective action under RCRA Section 3008(h).
2. Corrective Action Management Unit (CAMU): An area within a facility that is designated by the Regional Administrator under Part 264 Subpart S, for the purpose of implementing corrective action requirements under 40 CFR 264.101 and RCRA Section 3008(h). A CAMU shall only be used for the management of remediation wastes pursuant to implementing such corrective action requirements at the facility.
3. Remediation wastes: All solid and hazardous waste and all media (including groundwater, surface water, soils, and sediments) and debris, which contain listed hazardous wastes or which themselves exhibit a hazardous waste characteristic, that are managed for the purpose of implementing corrective action requirements under 40 CFR 264.101 and RCRA Section 3008(h). For a given facility, remediation wastes may originate only from within the facility boundary, but may include waste managed in implementing RCRA Sections 3004(v) or 3008(h) for releases beyond the facility boundary.
4. Solid Waste Management Unit: Any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous wastes. Such units include any area at a facility at which solid wastes have been routinely and systematically released.
5. Regulated Unit: Surface impoundments, waste piles, land treatment units, and landfills which received hazardous waste after July 26, 1982.
6. Release: Any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous constituents) into the environment (including abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

7. Hazardous Waste: Means a hazardous waste as defined in 40 CFR 261.3. A hazardous waste is a solid waste, or combination of solid wastes which, because of its quantity, concentration, or physical, chemical, or infectious characteristics may cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible or incapacitating reversible illness; or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. The term hazardous waste includes hazardous constituents defined below.
8. Hazardous Constituents: Any constituent identified in Appendix VIII of 40 CFR Part 261, or Appendix IX of 40 CFR Part 264.

Attachment IV

Ecological Assessment

ECOLOGICAL ASSESSMENT
For
Ford Motor Company, Monroe Stamping Plant
Monroe, Michigan

Index

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ECOLOGICAL ASSESSMENT

The Preliminary, Draft, and Final Ecological Assessment Reports should be submitted for all sites. The Additional Investigations for Site Characterization Workplan may not be necessary for all sites. The need for this Workplan will be determined by the results of the Preliminary Ecological Assessment Report.

I. Preliminary Ecological Assessment Report

The Permittee shall characterize the facility based on existing data and limited field work. Two copies of the Preliminary Ecological Assessment Report shall be submitted to the U.S. EPA and the MDNR. This preliminary characterization shall include:

- A. A description of the biota in surface water bodies on, adjacent to, or affected by the facility;
- B. A description of the ecology overlying and adjacent to the facility;
- C. A description of any endangered or threatened species near the facility;
- D. Identification of facility-specific conditions pertinent to the evaluation of fate and transport processes occurring at the site, such as amount of soil erosion;
- E. Identification of potential and probable exposure points for ecological receptors;
- F. Identification of any known or observed effects of facility contaminants to biota, such as fish kills or other obvious impacts;
- G. An initial toxicity assessment of facility contaminants. The potential for adverse ecological effects from contaminant exposure should be assessed. This preliminary assessment will necessarily contain much uncertainty; a conservative approach should be used; and
- H. An evaluation of the need for more data and further investigations to complete the ecological assessment. Some facilities may not require additional investigations such as those where exposure to ecological receptors is known to be minimal. However when the initial toxicity assessment provides ambiguous or uncertain conclusions, additional field data are needed (Additional Investigations for Site Characterization Workplan).

If required by the Regional Administrator, the Permittee shall further characterize the site based on additional field investigations. The additional field investigations shall include:

1. Habitat identification and evaluation;

2. Qualitative and semiquantitative surveys of flora and fauna;
3. Toxicity tests; and
4. Additional sampling to define contamination.

II. Additional Investigations For Site Characterization Workplan

If it is determined that further site characterization is necessary to complete the ecological assessment, the Permittee shall prepare a detailed workplan for further facility investigations. The workplan shall include the following, as appropriate:

- A. An identification of ecological assessment endpoints. Endpoint selection criteria must be clearly explained;
- B. Qualitative, semiquantitative, and quantitative surveys of flora and fauna.
- C. A description of chemical sampling in potentially exposed habitats and reference sites;
- D. A description of laboratory and in situ toxicity testing; and
- E. A description of tissue analyses.

For each proposed investigation above, the Permittee shall provide information regarding the following:

1. Study objectives and relevance to overall risk assessment objectives. Study objectives may include documentation of actual or potential endangerment or effects to the environment, the definition of spatial and temporal extent of contamination, development of remediation criteria, or evaluation of ecological effects of remedial alternatives;
2. Proposed field or laboratory methods, with appropriate reference to Agency guidelines or other source;
3. Expected sampling locations (including detailed maps), sampling dates, and sample size.
4. Statistical methods to be used and data quality objectives to meet statistical significance criteria; and
5. Quality control procedures.

III. Draft Ecological Assessment Report

The Permittee shall prepare a Draft Ecological Assessment Report and submit two copies of the Draft Ecological Assessment Report to the U.S. EPA and the MDNR. If the Permittee is not required to perform additional investigations, the Permittee shall resubmit the Preliminary Ecological Assessment Report in the form of a Draft Ecological Assessment Report. This report shall be submitted to the U.S. EPA and the MDNR. If additional investigations are required, the following outline shall be modified to account for investigations actually undertaken at the facility.

A. Facility Characterization and Identification of Potential Receptors (include detailed maps where appropriate).

1. Physical description of the facility;
2. Nature and extent of contamination by medium and contaminant type; and
3. Potentially exposed habitats and species.

B. Selection of Contaminants and Ecological Endpoints of Concern

1. Contaminants of concern and rationale for selection; and
2. Ecological endpoints of concern and rationale for selection.

C. Exposure Assessment

1. Sources and exposure pathways of contaminants of concern;
2. Fate and transport analysis, including possible food chain transport;
3. Estimation of exposure point concentrations by habitat, species, and exposure scenario; and
4. Uncertainty analysis.

D. Toxicity Assessment

1. Toxicological properties of contaminants of concern;
2. Facility-specific toxicity tests--laboratory and in situ;
3. Existing toxicity-based criteria and standards; and
4. Uncertainty analysis.

MODIFIED

E. Risk Characterization

1. Observed adverse effects in potentially exposed habitats compared to reference sites, such as (but not limited to) mortality (observed on-site or in toxicity tests), behavioral effects, presence or absence of key species, reproductive effects or altered community composition.
 - a. Analysis of contaminant concentrations in relation to observed adverse effects; and
 - b. Predicted (or observed) population-, community-, and ecosystem-level effects of observed effects.
2. Comparison of exposure point concentrations with relevant benchmark values. Possible additive, synergistic, or antagonistic effects or contaminant mixtures should be considered.
 - a. Comparison with appropriate criteria (such as ambient Water Quality Criteria) and standards (such as State Water Quality Standards); and
 - b. Comparison with contaminant levels known to cause effects from published or peer-reviewed literature. Possible population-, community-, and ecosystem-level effects should be predicted based on these comparisons.
3. Likely ecological risks associated with present and future land use scenarios.
4. Ecological considerations in selecting remedial alternatives (including no action).
5. Uncertainty analysis.

IV. Final Ecological Assessment Report

The Permittee shall modify the Draft Ecological Assessment Report to incorporate changes required in the Regional Administrator's comments and submit two copies of the Final Ecological Assessment Report to the U.S. EPA and the MDNR.

Attachment V

Biological Assessment and Protective Measures Plan

BIOLOGICAL ASSESSMENT AND PROTECTIVE MEASURES PLAN
For
Ford Motor Company, Monroe Stamping Plant
Monroe, Michigan

A. REQUIREMENTS FOR BIOLOGICAL ASSESSMENT (BA)

1. The Permittee shall contract a qualified biologist to conduct a survey of all areas at the facility which may be affected by the activities specified in the post-closure permit. The purpose of the survey is to determine if Federal or State listed, proposed, or candidate endangered or threatened species are present at the facility and whether the permitting activities may affected these species. If Federal or State proposed, listed, or candidate endangered or threatened species are found during the BA, the Permittee shall determine whether suitable habitat exists for either expanding the existing population or potential reintroduction of the species.

If Federal or State proposed, listed, or candidate endangered or threatened species are found in Item A.1. above, then the Permittee shall comply with the following.

2. The Permittee shall review scientific literature or data to determine species distribution, habitat needs, and other biological requirements. As part of this review, the Permittee shall also interview experts including those within the U.S. Fish and Wildlife Service, National Marine Fisheries Service, State of Michigan Conservation Departments, Universities, and others who may have data not yet published in scientific literature.
3. The Permittee shall review and analyze the effects of post-closure permit activities including consideration of cumulative effects of the post-closure permit activities on the species and its habitat.
4. The Permittee shall analyze alternative actions that may provide conservation measures for the species.
5. The Permittee shall prepare a written report documenting the results of the BA. This report shall include a discussion of the study methods used, identification of problems encountered, and other relevant information.

B. PROTECTIVE MEASURES PLAN FOR BALD EAGLE

1. The Permittee shall contract a bald eagle expert to identify the bald eagle pair and their nests at the facility. In addition, the bald eagle

expert shall assess/identify site-specific critical periods and zones, roosts and feeding sites, and activity patterns.

2. The Permittee shall retain the bald eagle expert to oversee on-site construction operations and monitor the bald eagles until December 1, 1995. If the bald eagle pair experiences early nest and re-nest failure during the breeding season, then the Permittee will not be required to implement the protective measures identified in Item B.6. below for that breeding season. During subsequent years of the closure construction activities, the bald eagle expert will not be required to be on-site, but will be required to review data provided from the video camera in Item 3 below to ensure that site activities do not disrupt normal behavior during the breeding season.
3. The Permittee shall install a video camera to monitor behavior of the bald eagle pair during the breeding season in response to on-the-ground construction activities specified in the Federal post-closure permit. Monitoring of the bald eagles using a video camera will enable the bald eagle expert to identify disruptive activities and determine respective distances to the nest so that critical zones may be adjusted accordingly. The Permittee shall use the video camera to monitor breeding behavior in subsequent years to ensure that on-site construction activities do not disrupt breeding behavior of the bald eagle pair. Field logs shall be kept of on-site construction activities so that activities can be correlated to the videotape.
4. If the eagle expert determines that remediation activities have an adverse impact on the bald eagles, then the Permittee shall notify the U.S. EPA and curtail site remediation activities until alternate protective measures can be implemented.
5. The Permittee shall submit a bald eagle management plan to the U.S. EPA by November 1, 1995, which will identify site specific critical periods and zones, roosts and feeding sites, and activity patterns.
6. The Permittee shall retain sufficient planning and contracting flexibility to schedule on-site field work in such a way as to eliminate any potential effects on the bald eagles. The Permittee shall organize construction activities associated with closure at the facility to minimize the impact to the bald eagle pair. During the breeding season, the Permittee shall implement the protective measures specified below.
 - a. Schedule construction activities outside the critical zones, as defined by the bald eagle expert and in the bald eagle management plan developed for subsequent years;
 - b. Schedule closure activities, that require walking and other out of vehicle activities, outside the critical zone during breeding season;

MODIFIED

- c. Insure that vehicle drivers stay in their vehicle while in the critical zone during the breeding season; and
- d. Phase in work to acclimate the bald eagle pair to construction during closure activities.

MODIFIED

MONROE METROPOLITAN WATER POLLUTION CONTROL FACILITY
INDUSTRIAL PRETREATMENT PROGRAM

INDUSTRIAL/NON-DOMESTIC USER DISCHARGE PERMIT

In compliance with certain provision of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq; the "Act"), the Michigan Water Resources Act, (Act 245, Public Acts of 1929, as amended, the "Michigan Act") and the Sewer Use Ordinance of the Monroe Metropolitan Water Pollution Control System (Monroe Township, Frenchtown Township, and City of Monroe--administered by the City of Monroe):

**Ford River Raisin Warehouse
3200 E. Elm Ave.
Monroe, Michigan 48162**

is authorized to discharge from a facility located at:

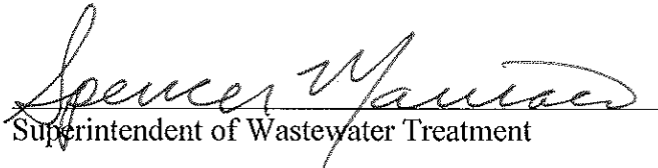
3200 East Elm Avenue

to the sanitary sewer identified in the accepted permit application, in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof.

This permit is based on the company's application dated April 6, 2021

Issued April 20, 2021 by the CITY OF MONROE.

This permit is valid for three year and will expire on April 20, 2024. A new application must be filed with the Monroe Metropolitan Wastewater Treatment Facility 30 days prior to the expiration date.


Superintendent of Wastewater Treatment

Permit No. 1030
 User: Ford River Raisin Warehouse
 Address: 3200 East Elm Avenue
 Expiration Date: April 20, 2024

PART I

REPORTING FREQUENCY

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

COMBINED DISCHARGE LIMITS

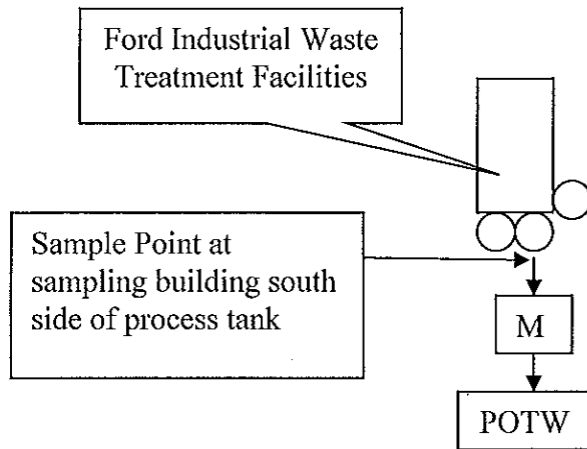
Parameter	Min. Daily mg/l	Max. Daily mg/l	Month Avg. mg/l	Sample		Instructions Miscellaneous
				Type	Freq	
pH	5.0	9.5		g	1	
Ammonia		65		g	1	
Phosphates		4.0		c	24 hr	
O & G		200.0		g	1	
Cd		0.04		c	24 hr	
Cu		2.0		c	24 hr	
Pb		0.75		c	24 hr	
Ag		1.0		c	24 hr	
CN ⁻		1.0		c	24 hr	
Hg		<0.0002		c	24 hr	
BOD		600		c	24 hr	
TSS *		2000		c	24 hr	

The limits are based on the Monroe Metropolitan sewer use ordinance.

*TSS Max. daily 2000 mg/L , but any discharge above 250 mg/L is still surcharged based on the sewer use ordinance.

c = composite g = grab

Sample Location as follows:



SELF-MONITORING PROGRAM

At least twice each year you are required to collect a composite/grab of your discharge and run the following laboratory analysis:

Analysis: All of the above

All analysis must be run in accordance with procedures detailed in the latest version of "Standard Methods" (Standard Methods of the Examination of Water and Wastewaters, 16th Edition, 1985 American Public Health Association, New York, New York, 10019, as amended).

B. SELF-MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. Sampling shall be conducted in March and September of each year. **Flow proportional** sampling for 24 hr composite samples is **not required** since all wastewater generated is discharged to a holding tank before discharging to POTW sewers.

2. Reporting

The permittee shall effectively monitor the operation and efficiency of all processes comprising the treatment and control facility and the quantity and quality of the treated discharge. Monitoring data required by this permit shall be tabulated, summarized, and reported twice per year.

Semi-Annual Report

A signed, Semi-Annual Discharge Report shall be submitted to the permitting authority. The permitting authority may require a permit holder to submit more frequent reports if, in his judgement, the waste being discharged is possibly in violation of the applicable ordinance. The report shall include but not be limited to industrial address name and address of contact person, nature of process, volume, rate of flow, discharge monitoring data, production quantities, hours of operation, personnel or other information that relates to the generation, handling, and discharge of wastes. The report may also include the chemical constituents and quantity of liquid or gaseous materials stored on site. If insufficient data has been furnished, other information will be provided upon request of the permitting authority.

All Required Reports and Applications must include the following statement, per the Sewer Use Ordinance Section 4, part 6.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Semi-Annual Report Forms are available at the Wastewater Department. Call 241-5926 for more information. Reports shall be mailed to the address below, postmarked no later than the fifteenth of April and October each year.

Monroe Metropolitan Water Pollution Control Facility
City of Monroe Wastewater Department
2205 East Front Street
Monroe, MI 48161

3. Test Procedures

- a. Methods - The analytical and sampling methods used shall conform to the latest edition of Standard Methods.
- b. Sample Types
 - 1) Composite Sample: A series of samples taken over a specific time period whose volume is proportional to flow or time, which are combined into one sample. The sample must be representative of the waste stream sampled.
 - 2) Grab Sample: A sample which is taken from a waste stream without regard to the flow in the waste stream and over a period of time not to exceed fifteen (15) minutes. The sample must be representative of the waste stream sampled.

The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date, time of sampling, and by whom;
- b. The dates the analyses were performed;
- c. The results of all required analyses.

5. Records Retention

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed and calibration and maintenance of instrumentation, and recording from continuous monitoring instrumentation, shall be retained for a minimum of three (3) years, or longer if requested by the City of Monroe Director of Wastewater or his/her designee (permitting authority).

PART II

A. PERMIT PROGRAM ADMINISTRATION

City of Monroe for the Monroe Metropolitan Water Pollution Control System

B. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant or flow volume identified in this permit more frequently than, or at a level in excess of that authorized, shall constitute a violation of the permit. Any anticipated facility expansions or process modifications which will result in new, different, or increased discharges of pollutants or flow volumes must be reported by submission of a new Discharge Permit Application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permitting authority of such changes. Following such notice, the permit may be modified to specify and limit any parameters not previously limited.

2. Operator Certification

The permittee may be required to have the pretreatment facility under the direct supervision of an operator certified by the Michigan Department of Environmental Quality as required by Regulations Governing the Certification of Industrial Waste Treatment Plant Operators in accordance with Act 98, Public Acts of 1913, as amended.

3. Facilities Operation

All waste collection, control, treatment, and disposal facilities shall be operated in a manner consistent with the following:

- a. At all times, all facilities shall be operated as efficiently as possible, and in a manner which will minimize upsets and discharges of excessive pollutants.
- b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to insure compliance with the conditions of this permit.
- c. Maintenance of treatment facilities shall not result in degradation of effluent quality, or, if degradation of effluent is unavoidable, shall be scheduled during non-critical water quality periods and shall be carried out only if prior approval has been granted by the permitting authority.

4. Removed Substance and Leachates

Solids, sludges, filter backwash, leachates, or other pollutants removed from or resulting from treatment or control of wastewaters shall be controlled in accordance with a program approved under Act 98, Public Acts of 1913, as amended.

5. Containment Facilities

The permittee shall provide facilities approved under Act 98, Public Acts of 1913, as amended, and in accordance with the requirements of the Michigan Water Resources Commission Rules, Part 5, for containment of any accidental losses of concentrated solutions, acids, alkalies, salts, oils, or other toxic substances or prohibited discharges as defined in Sewer Use Ordinance of the Monroe Metropolitan Water Pollution Control System.

6. Accidental Discharge

In the case of an accidental discharge of toxic or prohibited substances to the sewage system, the permittee shall immediately telephone and notify the City of Monroe Wastewater Department at **241-5926** of the incident. The notification shall include location of discharge, type of waste, concentration, volume and corrective actions, including but not limited to containment. This is to be followed, within five (5) days, by a detailed, written report to the permitting authority describing the cause of the discharge and the measures to be taken by the

permittee to prevent similar future occurrences. Such notification shall not relieve the permittee of any expense, loss, damage, or other liability which may be incurred as a result of damage to the Publicly-Owned Treatment Works (POTW), fish kills, or any other damage to person or property; nor shall such notification relieve the permittee of any fines, civil penalties, or other liability which may be imposed pursuant to our Sewer Use Ordinance or other applicable law.

7. Notice to Employees

A notice shall be permanently posted on the permittee's bulletin board or other prominent place advising employees of emergency notification procedures in the event of an accidental discharge. Permittee shall insure that all employees who may cause or discover such a discharge are advised of the emergency notification procedure.

8. Operating Upsets

Any permittee which experiences an upset in operations which places the permittee in a temporary state of non-compliance with the requirements of this permit shall inform the permitting authority immediately upon the first awareness of the commencement of the upset.

Where such information is given orally, a written follow-up report thereof shall be filed by the permittee with the permitting authority within five (5) days of the date of occurrence. The report shall specify:

- a. Description of the upset, the cause thereof, and the upset's impact on a permittee's compliance status;
- b. Duration of non-compliance, including exact date(s) and time(s) of non-compliance, and if the non-compliance continues, the time by which compliance is reasonably expected to occur;
- c. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset or other conditions of non-compliance.

C. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Monroe Metropolitan Water Pollution Control Facility personnel, upon the presentation of credentials, access at all reasonable times to all parts of the premises for the purposes of inspection, sampling, records examination, and copying or in the performance of any of their duties related to the administration of the Industrial Pretreatment Program (IPP).

2. Transfer of Ownership or Control

In the event of any change in control or ownership at the facility from which the authorized discharge emanates, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the permitting

authority (see previous address). The new owner shall then make application for transfer of this permit through the permitting authority. Application for transfer shall be made within ten (10) days prior to operation of the business by a new owner or proprietor.

3. Federal Categorical Pretreatment Standards

Upon the promulgation of Federal Categorical Pretreatment Standards for a particular industrial subcategory, the Federal Standard, if more stringent than limitations imposed under this permit for sources in that subcategory, shall immediately supersede the limitations imposed under this permit. The permitting authority shall notify all affected permittees of the applicable pretreatment standards. More stringent standards may be applied by the permitting authority where necessary to achieve the goals of the IPP Program.

4. Permit Modification

This permit may be modified in whole or in part during its term in order to further the objectives of the IPP Program.

5. Revocation of Permit

The Superintendent of Wastewater may revoke a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- a. Failure to notify the Superintendent of Wastewater of significant changes to the wastewater prior to the changed discharge;
- b. Failure to provide prior notification to the Superintendent of Wastewater of changed conditions pursuant to Section 6.5 of this ordinance;
- c. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- d. Falsifying self-monitoring reports;
- e. Tampering with monitoring equipment;
- f. Refusing to allow wastewater personnel timely access to the facility premises and records;
- g. Failure to meet effluent limitations;
- h. Failure to pay fines;
- i. Failure to pay sewer charges;

- j. Failure to meet compliance schedules;
- k. Failure to complete a wastewater survey or the wastewater discharge permit application;
- l. Failure to provide advance notice of the transfer of business ownership of a permitted facility; or
- m. Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit or this ordinance.

6. Remedies

When any user violates any provision in the approved sewer use ordinance, a wastewater discharge permit or order issued by the Superintendent of Wastewater, or any other pre-treatment standard or requirement, the Superintendent of Wastewater may utilize one or more of the following remedies:

- a. Notification of Violation
- b. Consent Order
- c. Show Cause Hearing
- d. Compliance Orders
- e. Cease and Desist Orders
- f. Administrative Fines not to exceed \$500./occurrence/day
- g. Emergency Suspension
- h. Termination of Discharge
- i. Injunctive Relief
- j. Criminal Penalties
- k. Civil Remedies
- l. Other Actions as Deemed Necessary

A complete listing and description of the remedies can be found in the Sewer Use Ordinance, Section 10, and Section 11.

7. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor infringement of Federal, State, or local laws or regulations.

8. Severability

If any provisions, paragraph, word, or section of this permit is invalidated by any court of competent jurisdiction, the remaining provisions, paragraphs, words, and sections shall not be affected and shall continue in full force and effect.

PART III

SPECIAL CONDITIONS

1. Prohibited Discharges

The permittee must comply with all the Local Limits and General and Specific Discharge Prohibitions contained in Section 2 of the Sewer Use Ordinance, however, specific effluent limitations for the permitted facility are contained in Part I, A of this permit.

2. Treatment Technology

Incompatible pollutants shall be reduced to levels attainable through application of the best practicable control technology currently available as defined in Section 304(b) of the Act, unless otherwise indicated in the discharge permit. Necessary pretreatment requirements will be implemented (as provided for in 40 CFR, Part 128).

3. Periodic Compliance Reports

Any permittee subject to an IPP Program shall, after the compliance date of such pretreatment standards, or, in the case of a new permittee, after commencement of the discharge to the POTW, submit to the permitting authority during the months of April and October, unless required more frequently by the permitting authority, a report indicating the nature and concentration of prohibited or regulated substances in the effluent which are limited by the pretreatment standards hereof. In addition, this report shall include a record of all measured or estimated average and maximum daily flows during the reporting period. Flow (if available) shall be reported on the basis of actual measurement, provided however, where cost of feasibility considerations justify, the permitting authority may accept reports of average and maximum flows estimated by verifiable techniques approved by the direction. The permitting authority, for good cause shown considering such factors as local high or low flow rates, holidays, budget cycles, or other extenuating factors, may authorize the submission of said reports on months other than those specified above.

4. Control Manholes

The permittee may be required to provide control manhole(s) for the purpose of sampling, monitoring, and measuring. Location, location drawings, right of inspection, and facility drawings are to be provided in accordance with City of Monroe Ordinance 00-005. Specifications for the installation of control manholes shall be submitted to the permitting authority for review and approval prior to installation for all new significant industrial users.

MONROE METROPOLITAN WATER POLLUTION CONTROL FACILITY
INDUSTRIAL PRETREATMENT PROGRAM

INDUSTRIAL/NON-DOMESTIC USER DISCHARGE PERMIT

In compliance with certain provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq; the "Act"), and the Sewer Use Ordinance of the Monroe Metropolitan Water Pollution Control System (Monroe Township, Frenchtown Township, and City of Monroe: administered by the City of Monroe):

**Ford River Raisin Warehouse
3200 E. Elm Ave.
Monroe, Michigan 48162**

is authorized to discharge from the **Surface Impoundment Closure Project** located at:

3200 East Elm Avenue

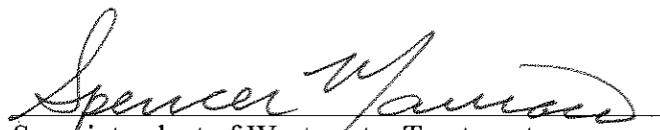
to the sanitary sewer identified in the accepted permit application, in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof.

This permit is based on the company's application dated **April 6, 2021**.

Categorical Statement, In accordance with the application and the evaluation of pertinent information, **Ford River Raisin Warehouse** is classified as a **non-categorical** user.

Issued **April 20, 2021** by the CITY OF MONROE.

This permit is valid for three years and will expire on **April 20, 2024**. A new application must be filed with the Monroe Metropolitan Wastewater Treatment Facility 30 days prior to the expiration date.


Superintendent of Wastewater Treatment

Permit No. 1030-1
 User: **Ford River Raisin Warehouse**
 Address: **3200 East Elm Avenue**
 Expiration Date: **April 20, 2024**

PART I

REPORTING FREQUENCY

A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

SELF MONITORING & DAILY DISCHARGE LIMITS

*NOTE: DO NOT DISCHARGE IF ANY PARAMETER IS EXCEEDED.

Parameter	Max. Daily (ppm)	Max. Daily flow	Frequency	Sample		Instructions Miscellaneous
				Type	Freq.	
Cd	0.04	<0.5 MGD	Semi-annual	G	24 hr.	
Cu	1.0	<0.5 MGD	Semi-annual	G	24 hr.	
Cr	1.5	<0.5 MGD	Semi-annual	G	24 hr.	
Ni	4.0	<0.5 MGD	Semi-annual	G	24 hr.	
Zn	2.61	<0.5 MGD	Semi-annual	G	24 hr.	
S.S.	750	<0.5 MGD	Semi-annual	G	24 hr.	
pH	5.0-9.5	<0.5 MGD	Semi-annual	G	24 hr.	
CN	1.0		Semi-annual	G	24 hr.	
Hg	<Detectable		Semi-annual	G	24 hr.	
PCB'S	<Detectable		Semi-annual	G	24 hr.	

Grab samples from each batch tank in an equal portion. *c = composite g = grab*

1. PCB'S AND MERCURY REPORTING (Semi-annual).

If either PCB's or Mercury are reported in detectable amounts for the reporting period, Ford Motor Company will be required to go back to daily analysis for the item detected. Daily reports will be required for a minimum of a one month period. If these results prove less than detectable the superintendent may reduce the analysis back to Semi-annual.

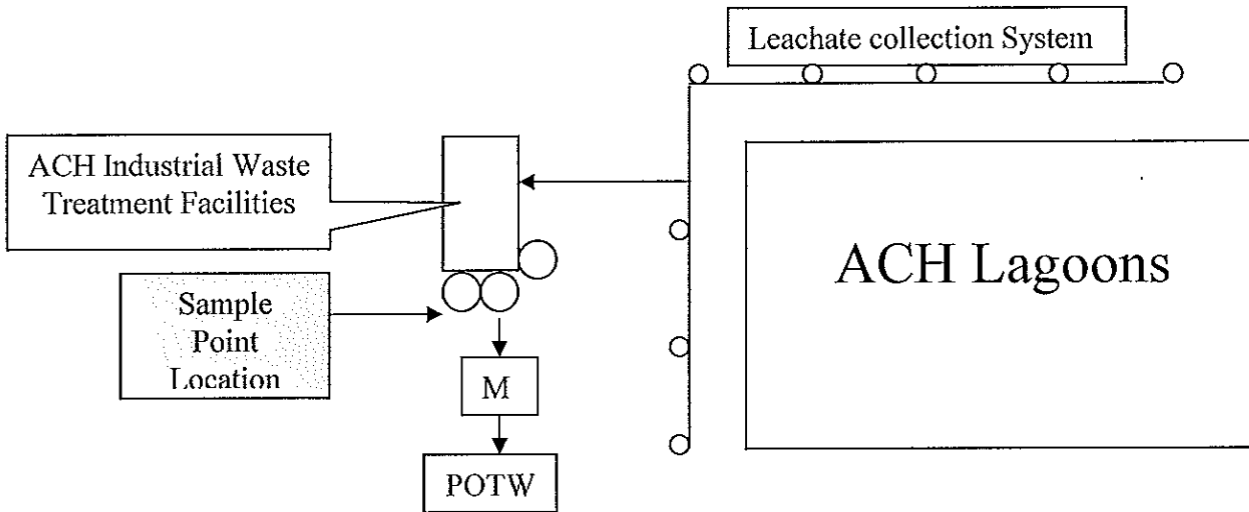
2. SEMI-ANNUAL REPORTS.

For all other parameters (metals, Cyanide, TSS, and pH) ACH used to submit monthly reports prior to discharge, this requirement has been reduced to semi-annual monitoring since 14 years (596 batch discharges) data has been well below permit limits. Reports may be faxed to the Monroe Metro WWTP at (734)-241-7780.

All reports must include:

- a. Discharge time (the time frame that each process tank was discharged) and date.
- b. Discharge volume.
- c. Proportional grab sample must be taken from each process tank discharge, and combined to make one sample representative of the total discharge. This representative sample will be analyzed for the parameters listed above.

Sample location as follows:



B. SELF-MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting

The permittee shall effectively monitor the operation and efficiency of all processes comprising the treatment and control facility and the quantity and quality of the treated discharge.

Monitoring data required by this permit shall be tabulated, summarized, and reported twice per year.

Semi-Annual Report

A signed, Semi-Annual Discharge Report shall be submitted to the permitting authority. The permitting authority may require a permit holder to submit more frequent reports if, in his judgement, the wastes being discharged are possibly in violation of the applicable ordinance. The report shall include but not be limited to industrial address name and address of contact person, nature of process, volume, rate of flow, discharge monitoring data, production quantities, hours of operation, personnel or other information that relates to the generation, handling, and discharge of wastes. The report may also include the chemical constituents and quantity of liquid or gaseous materials stored on site. If insufficient data has been furnished, other information will be provided upon request of the permitting authority.

All Required Reports and Applications must include the following statement, per the Sewer Use Ordinance Section 4, part 6.

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Semi-Annual Report Forms are available at the Wastewater Department. Call 241-5926 for more information. Reports shall be mailed to the address below, postmarked no later than the fifteenth of April and October each year.

Monroe Metropolitan Water Pollution Control Facility
City of Monroe Wastewater Department
2205 East Front Street
Monroe, MI 48161

3. Test Procedures
 - a. Methods - The analytical and sampling methods used shall conform to the latest edition of Standard Methods.
 - b. Sample Types
 - 1) Composite Sample. A series of samples taken over a specific time period whose volume is proportional to flow or time, which are combined into one sample. The sample must be representative of the waste stream sampled.
 - 2) Grab Sample. A sample which is taken from a waste stream without regard to the flow in the waste stream and over a period of time not to exceed fifteen (15) minutes. The sample must be representative of the waste stream sampled.

The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements.

4. Recording of Results
For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:
 - a. The exact place, date, time of sampling, and by whom;
 - b. The dates the analyses were performed;
 - c. The results of all required analyses.

5. Records Retention

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed and calibration and maintenance of instrumentation, and recording from continuous monitoring instrumentation, shall be retained for a minimum of three (3) years, or longer if requested by the City of Monroe Superintendent of Wastewater or his designee (permitting authority).

PART II

A. PERMIT PROGRAM ADMINISTRATION

City of Monroe for the Monroe Metropolitan Water Pollution Control System

B. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant or flow volume identified in this permit more frequently than, or at a level in excess of that authorized, shall constitute a violation of the permit. Any anticipated facility expansions or process modifications which will result in new, different, or increased discharges of pollutants or flow volumes must be reported by submission of a new Discharge Permit Application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permitting authority of such changes. Following such notice, the permit may be modified to specify and limit any parameters not previously limited.

2. Operator Certification

The permittee may be required to have the pretreatment facility under the direct supervision of an operator certified by the Michigan Department of Environmental Quality as required by Regulations Governing the Certification of Industrial Waste Treatment Plant Operators in accordance with Act 98, Public Acts of 1913, as amended.

3. Facilities Operation

All waste collection, control, treatment, and disposal facilities shall be operated in a manner consistent with the following:

- a. At all times, all facilities shall be operated as efficiently as possible, and in a manner which will minimize upsets and discharges of excessive pollutants.
- b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to insure compliance with the conditions of this permit.
- c. Maintenance of treatment facilities shall not result in degradation of effluent quality, or, if degradation of effluent is unavoidable, shall be scheduled during non-critical water

quality periods and shall be carried out only if prior approval has been granted by the permitting authority.

4. Removed Substance and Leachates

Solids, sludges, filter backwash, leachates, or other pollutants removed from or resulting from treatment or control of wastewater shall be controlled in accordance with a program approved under Act 98, Public Acts of 1913, as amended.

5. Containment Facilities

The permittee shall provide facilities approved under Act 98, Public Acts of 1913, as amended, and in accordance with the requirements of the Michigan Water Resources Commission Rules, Part 5, for containment of any accidental losses of concentrated solutions, acids, alkalies, salts, oils, or other toxic substances or prohibited discharges as defined in Sewer Use Ordinance of the Monroe Metropolitan Water Pollution Control System.

6. Accidental Discharge

In the case of an accidental discharge of toxic or prohibited substances to the sewage system, the permittee shall immediately telephone and notify the City of Monroe Wastewater Department at **241-5926** of the incident. The notification shall include location of discharge, type of waste, concentration, volume and corrective actions, including but not limited to containment. This is to be followed, within five (5) days, by a detailed, written report to the permitting authority describing the cause of the discharge and the measures to be taken by the permittee to prevent similar future occurrences. Such notification shall not relieve the permittee of any expense, loss, damage, or other liability which may be incurred as a result of damage to the Publicly-Owned Treatment Works (POTW), fish kills, or any other damage to person or property; nor shall such notification relieve the permittee of any fines, civil penalties, or other liability which may be imposed pursuant to our Sewer Use Ordinance or other applicable law.

7. Notice to Employees

A notice shall be permanently posted on the permittee's bulletin board or other prominent place advising employees of emergency notification procedures in the event of an accidental discharge. Permittee shall insure that all employees who may cause or discover such a discharge are advised of the emergency notification procedure.

8. Operating Upsets

Any permittee which experiences an upset in operations which places the permittee in a temporary state of non-compliance with the requirements of this permit shall inform the permitting authority immediately upon the first awareness of the commencement of the upset. Where such information is given orally, a written follow-up report thereof shall be filed by the permittee with the permitting authority within five (5) days of the date of occurrence. The report shall specify:

- a. Description of the upset, the cause thereof, and the upset's impact on a permittee's compliance status;
- b. Duration of non-compliance, including exact date(s) and time(s) of non-compliance, and if the non-compliance continues, the time by which compliance is reasonably expected to occur;
- c. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset or other conditions of non-compliance.

C. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Monroe Metropolitan Water Pollution Control Facility personnel, upon the presentation of credentials, access at all reasonable times to all parts of the premises for the purposes of inspection, sampling, records examination, and copying or in the performance of any of their duties related to the administration of the Industrial Pretreatment Program (IPP).

2. Transfer of Ownership or Control

In the event of any change in control or ownership at the facility from which the authorized discharge emanates, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the permitting authority (see previous address). The new owner shall then make application for transfer of this permit through the permitting authority. Application for transfer shall be made within ten (10) days prior to operation of the business by a new owner or proprietor.

3. Federal Categorical Pretreatment Standards

Upon the promulgation of Federal Categorical Pretreatment Standards for a particular industrial subcategory, the Federal Standard, if more stringent than limitations imposed under this permit for sources in that subcategory, shall immediately supersede the limitations imposed under this permit. The permitting authority shall notify all affected permittees of the applicable pretreatment standards. More stringent standards may be applied by the permitting authority where necessary to achieve the goals of the IPP Program.

4. Permit Modification

This permit may be modified in whole or in part during its term in order to further the objectives of the IPP Program.

5. Revocation of Permit

The Superintendent of Wastewater may revoke a wastewater discharge permit for good cause, including, but not limited to, the following reasons:

- a. Failure to notify the Superintendent of Wastewater of significant changes to the wastewater prior to the changed discharge;
- b. Failure to provide prior notification to the Superintendent of Wastewater of changed conditions pursuant to Section 6.5 of this ordinance;
- c. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application;
- d. Falsifying self-monitoring reports;
- e. Tampering with monitoring equipment;
- f. Refusing to allow the Superintendent of Wastewater timely access to the facility premises and records;
- g. Failure to meet effluent limitations;
- h. Failure to pay fines;
- i. Failure to pay sewer charges;
- j. Failure to meet compliance schedules;
- k. Failure to complete a wastewater survey or the wastewater discharge permit application;
- l. Failure to provide advance notice of the transfer of business ownership of a permitted facility; or
- m. Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit or this ordinance.

6. Remedies

When any user violates any provision in the approved sewer use ordinance, a wastewater discharge permit or order issued by the Superintendent of Wastewater, or any other pre-treatment standard or requirement. The Superintendent of Wastewater may utilize one or more of the following remedies:

- a. Notification of Violation
- b. Consent Order
- c. Show Cause Hearing
- d. Compliance Orders
- e. Cease and Desist Orders
- f. Administrative Fines not to exceed \$500./occurrence/day
- g. Emergency Suspension
- h. Termination of Discharge
- i. Injunctive Relief
- j. Criminal Penalties
- k. Civil Remedies
- l. Other Actions as Deemed Necessary

A complete listing and description of the remedies can be found in the Sewer Use Ordinance, Section 10, and Section 11.

7. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor infringement of Federal, State, or local laws or regulations.

8. Severability

If any provisions, paragraph, word, or section of this permit is invalidated by any court of competent jurisdiction, the remaining provisions, paragraphs, words, and sections shall not be affected and shall continue in full force and effect.

PART III

SPECIAL CONDITIONS

1. Prohibited Discharges

The permittee must comply with all the Local Limits and General and Specific Discharge Prohibitions contained in Section 2 of the Sewer Use Ordinance, however, specific effluent limitations for the permitted facility are contained in Part I, A of this permit.

2. Treatment Technology

Incompatible pollutants shall be reduced to levels attainable through application of the best practicable control technology currently available as defined in Section 304(b) of the Act, unless otherwise indicated in the discharge permit. Necessary pretreatment requirements will be implemented (as provided for in 40 CFR, Part 128).

3. Periodic Compliance Reports

Any permittee subject to an IPP Program shall, after the compliance date of such pretreatment standards, or, in the case of a new permittee, after commencement of the discharge to the POTW, submit to the permitting authority during the months of April and October, unless required more frequently by the permitting authority, a report indicating the nature and concentration of prohibited or regulated substances in the effluent which are limited by the pretreatment standards hereof. In addition, this report shall include a record of all measured or estimated average and maximum daily flows during the reporting period. Flow (if available) shall be reported on the basis of actual measurement, provided however, where cost or feasibility considerations justify, the permitting authority may accept reports of average and maximum flows estimated by verifiable techniques approved by the superintendent. The permitting authority, for good cause shown considering such factors as local high or low flow rates, holidays, budget cycles, or other extenuating factors, may authorize the submission of said reports on months other than those specified above.

4. Control Manholes

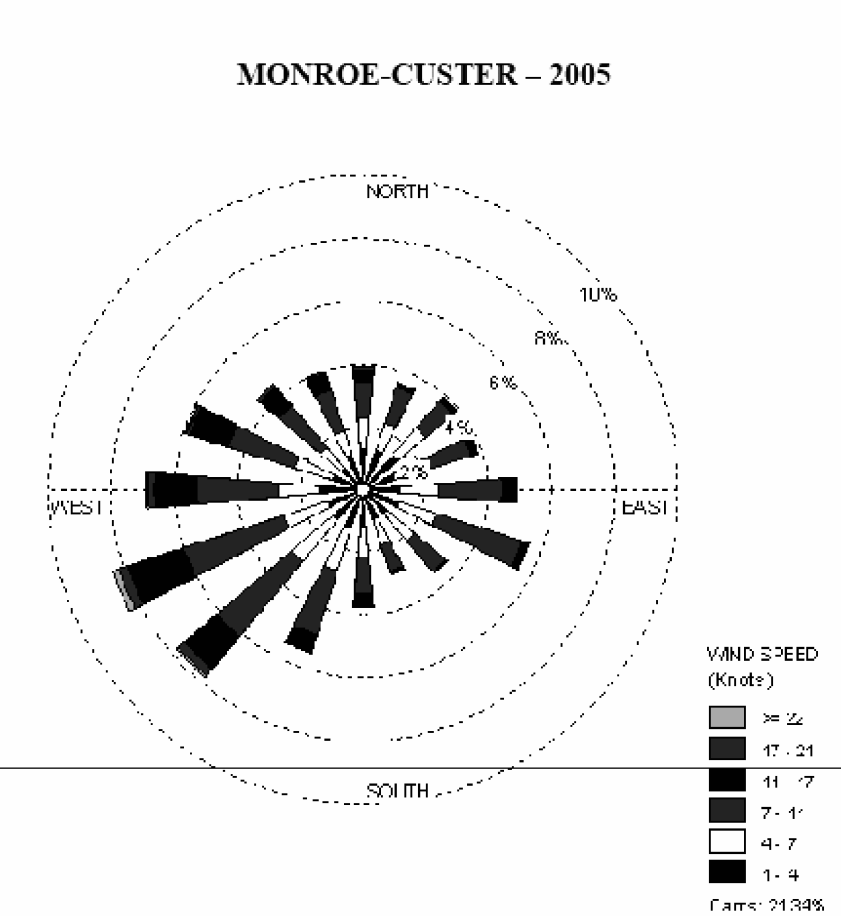
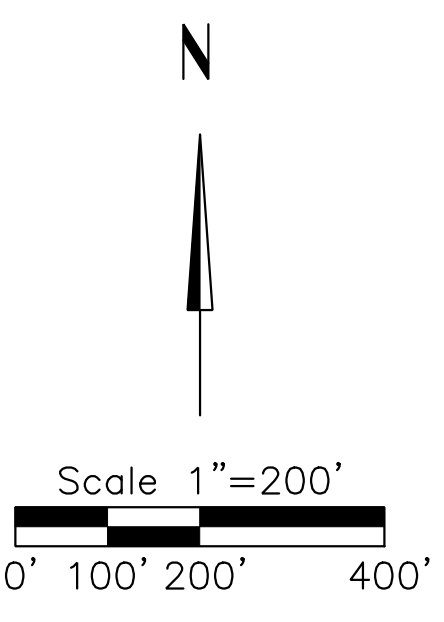
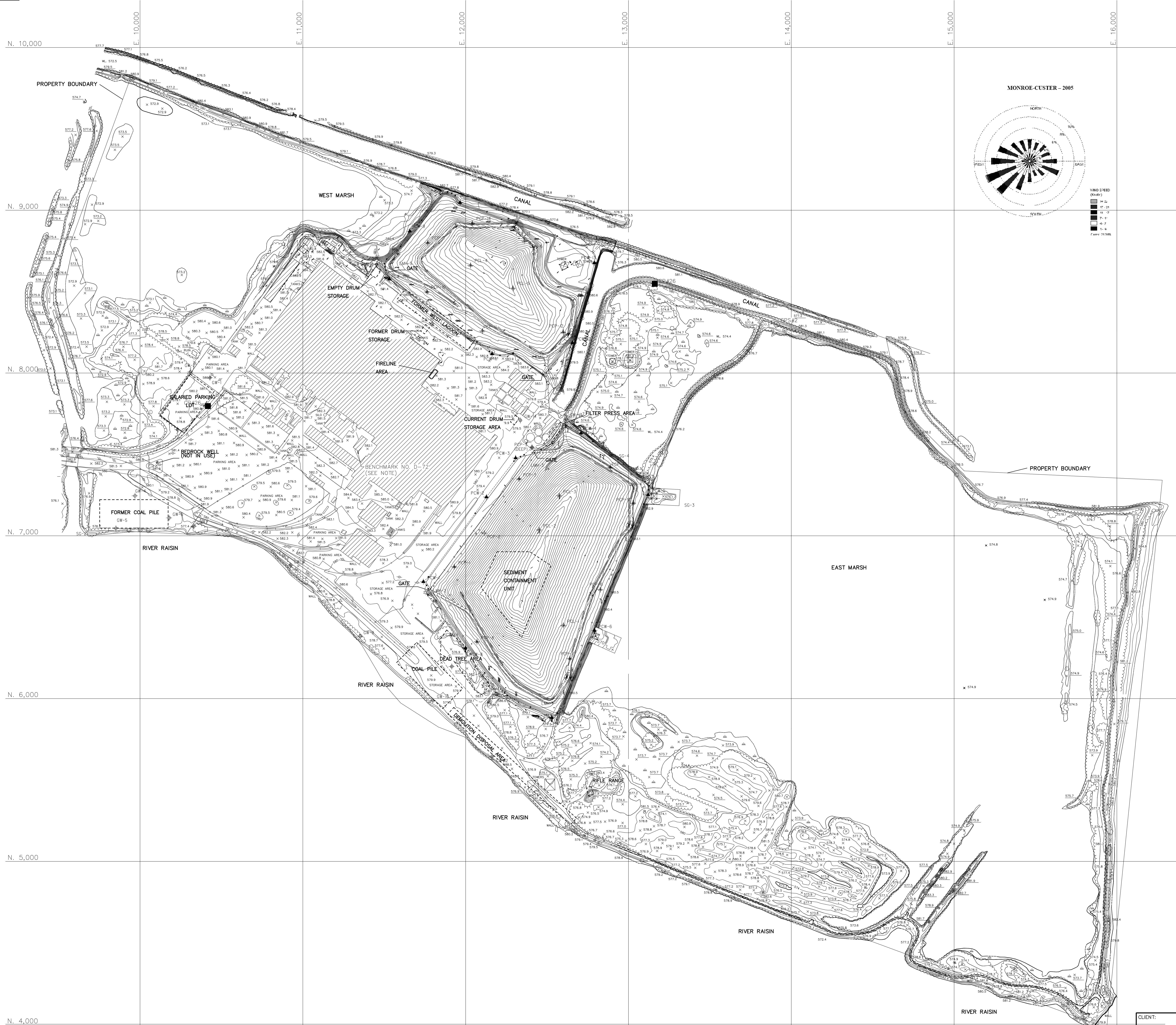
The permittee may be required to provide control manhole(s) for the purpose of sampling, monitoring, and measuring. Location, location drawings, right of inspection, and facility drawings are to be provided in accordance with City of Monroe Ordinance 00-005. Specifications for the installation of control manholes shall be submitted to the permitting authority for review and approval prior to installation for all new significant industrial users.

5. Baseline Monitoring Reports

As required in 40 CFR 403.6(a)(4), all categorical industrial users must submit to the permitting authority a Baseline Monitoring Report (BMR). For additional information regarding this subject see section 6.1 of the Monroe Metro Sewer Use Ordinance or obtain the USEPA Guidance Manual for your categorical industry.

Attachment 2

Topographic Map



NOTES:

1. AERIAL PHOTOGRAPHY WAS COMPLETED ON NOVEMBER 24, 1995. UPDATES TO THE LANDFILL AREAS COMPLETED IN 2004.
2. ELEVATIONS ARE BASED ON USLS BENCHMARK NO. D-72 (1935) WHICH IS AT AN ELEVATION OF 585.282'. THIS BENCHMARK IS A BRASS DISK IN THE SIDE OF THE PLANT BUILDING.
3. PLANT BOUNDARY SHOWN IS APPROXIMATE.

LEGEND:

- WELLS LOCATED WITHIN ONE MILE RADIUS OF SITE

REV.	DATE	DESCRIPTION
2	9/08	PERMIT APPLICATION MODIFICATIONS
1	08/08	SUBMITTED WITH OPERATING LICENSE PERMIT APPLICATION RENEWAL

Mannik & Smith Group, Inc.
 2365 Haggerty Road South Canton, Michigan 48188
 Telephone: (734) 397-3100

THIS DRAWING IS CONFIDENTIAL AND SHALL NOT BE USED OR REPRODUCED IN ANY PART WITHOUT WRITTEN CONSENT OF THE FACILITY OWNER.

CLIENT:

Automotive Components Holdings, LLC

TITLE: AUTOMOTIVE COMPONENTS HOLDINGS, LLC TOPOGRAPHIC MAP		REV. NO.
DRAWN: LWB	DATE: 08/06	SCALE: AS NOTED
DESIGNED: LWB	DATE: 08/06	PROJECT: TEP
APPROVED: JSB	DATE: 08/06	PROJECT: FORDA1A
DRAWING NO. Attachment II	CADD FILE: FORDA1A_A_FXD1.DGN	REV. NO. 2

Attachment 3

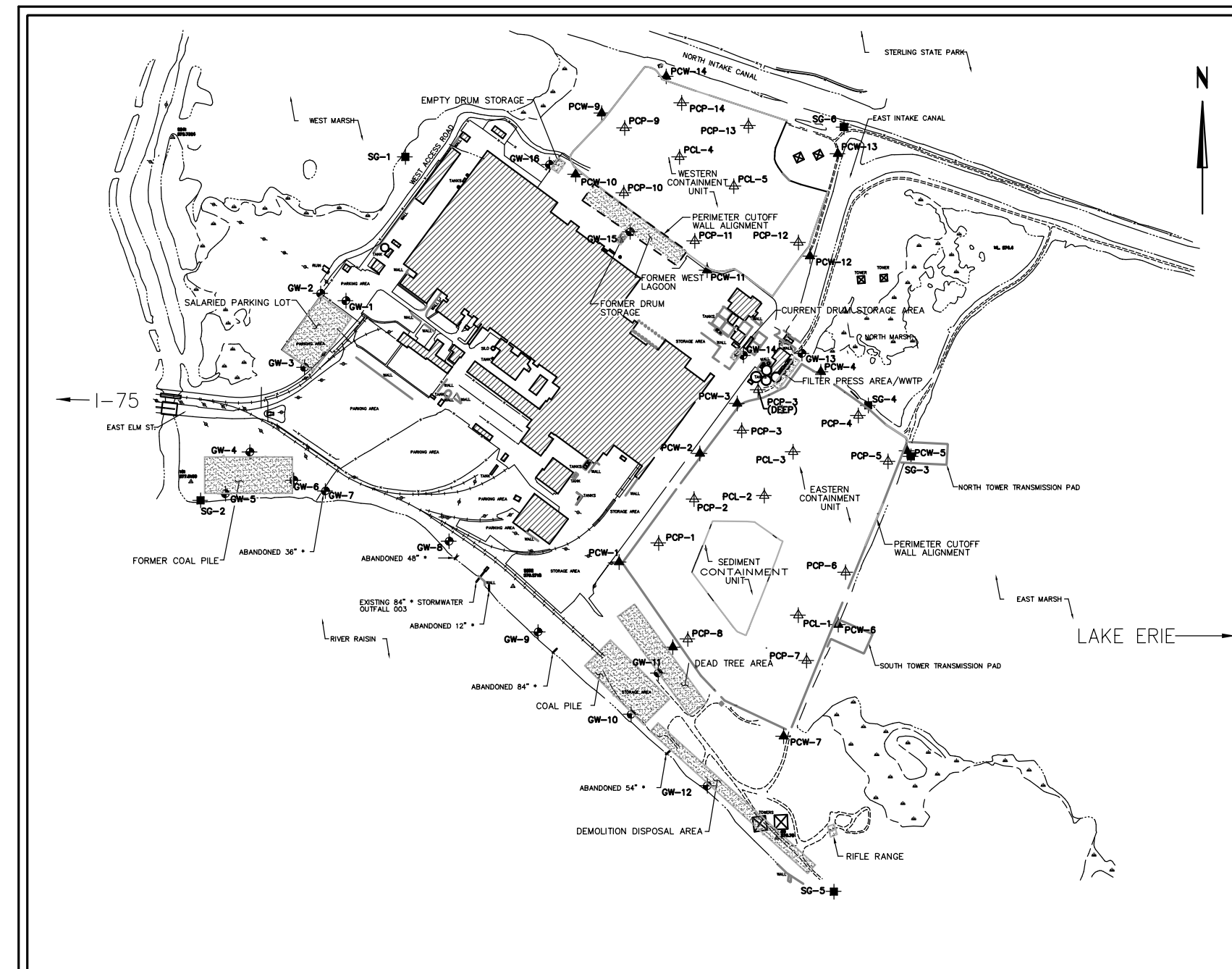
Other Facility Drawings

FORD MOTOR COMPANY MONROE PLANT

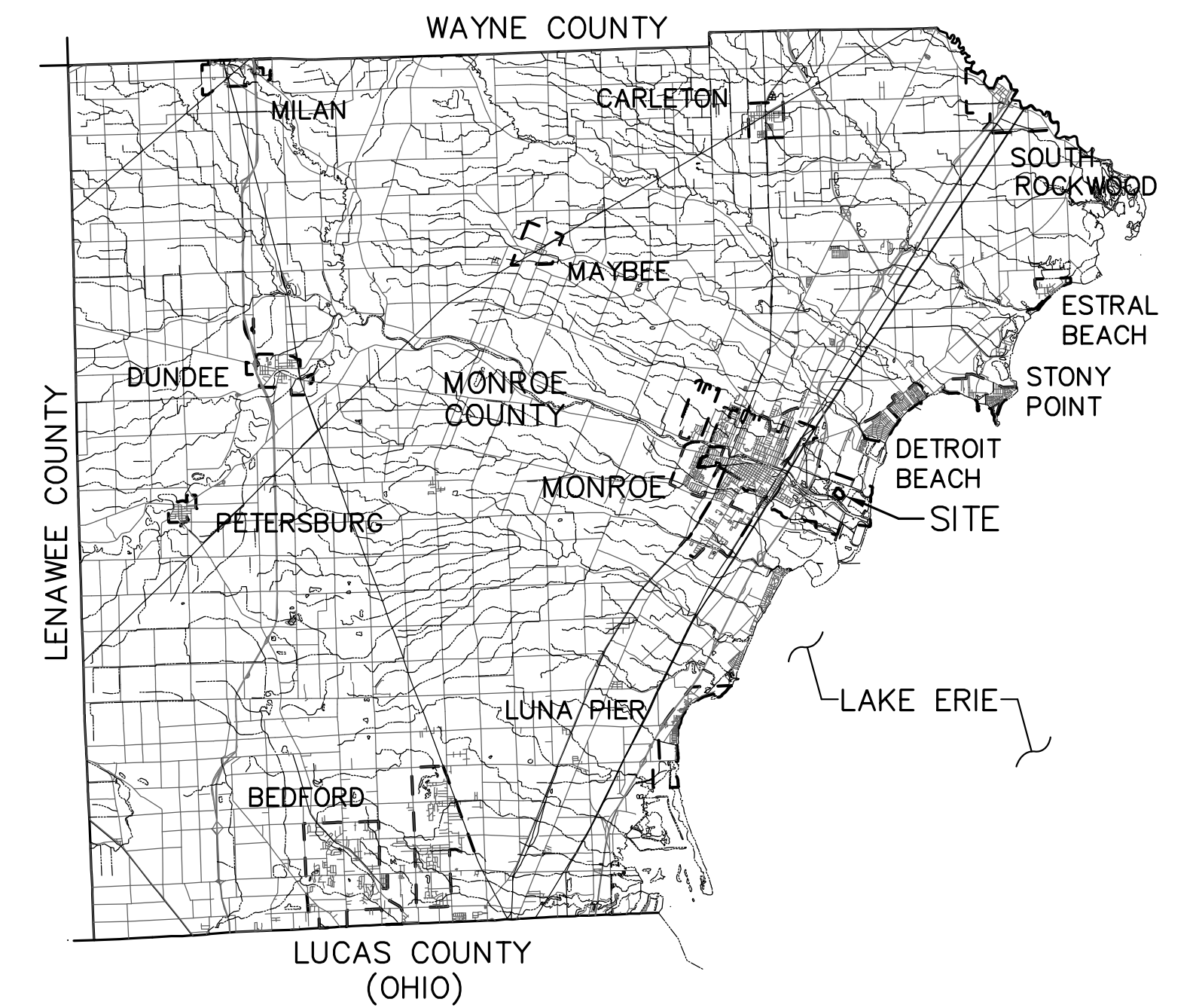
MID 005 057 005
MONROE, MICHIGAN



SITE LOCATION MAP



SITE LOCATION MAP



INDEX OF DRAWINGS

SITE LOCATION MAP/TITLE SHEET	1
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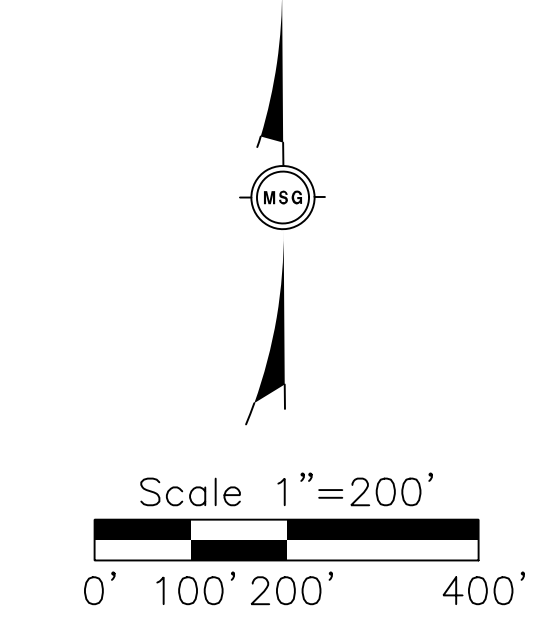
FORD MOTOR COMPANY ENVIRONMENTAL QUALITY OFFICE

Suite 800, Fairlane Plaza North
290 Town Center Drive
Dearborn, Michigan 48126

PREPARED BY:



6/9/2017 8:38:14 AM
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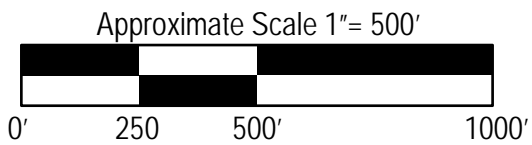
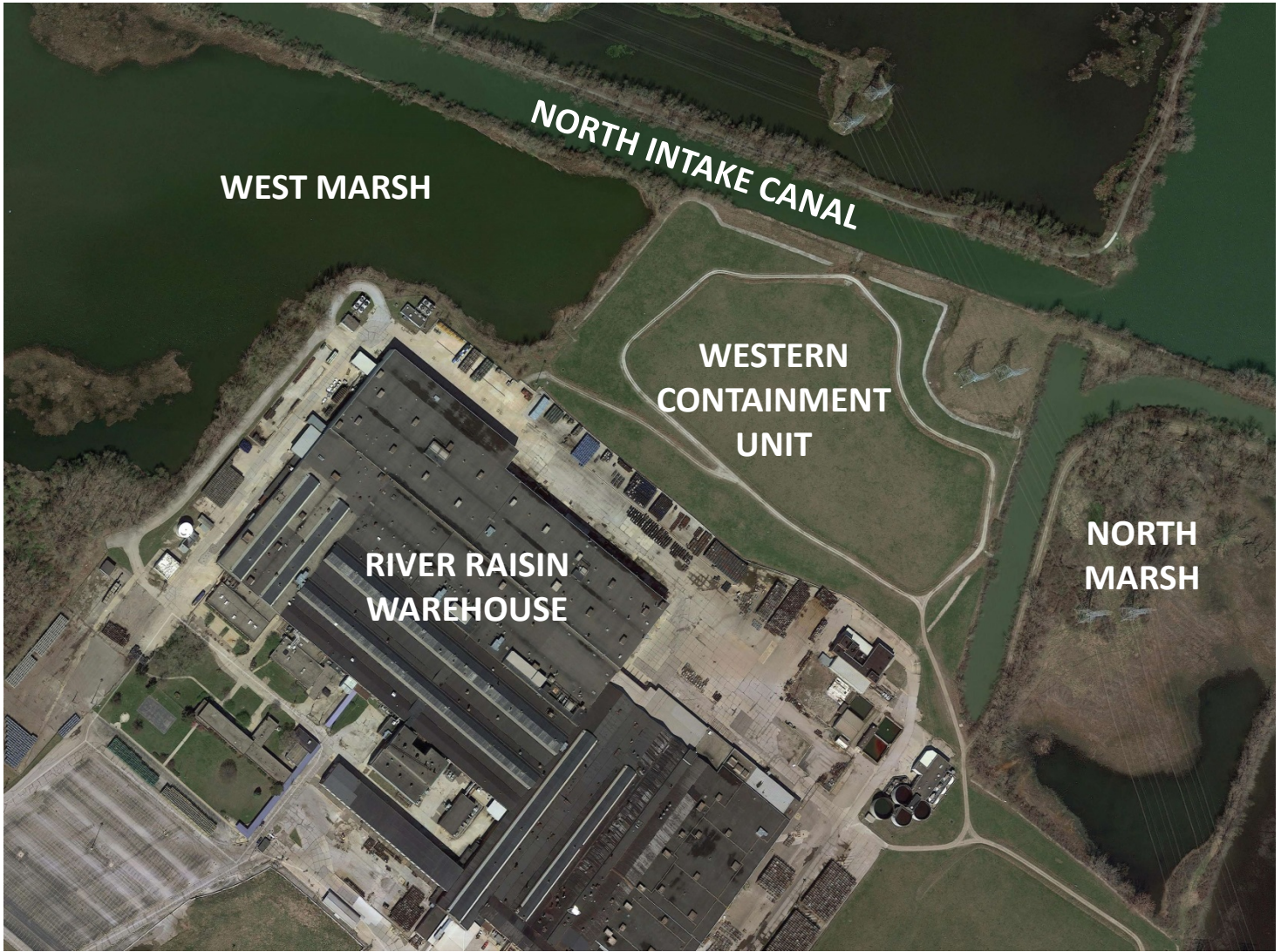


- LEGEND:**
- GW-# GROUND WATER INVESTIGATION MONITORING WELL
 - ▲ PCP-# POST-CLOSURE PIEZOMETER OR PCL-#
 - ▲ PCW-# POST-CLOSURE DETECTION MONITORING WELL
 - SG-# SURFACE WATER LEVEL MONITORING STATION
 - LMH-7 LCRS MANHOLE WITH DESIGNATION
 - CUTOFF WALL
 - LEACHATE COLLECTION PIPE (6")
 - ▭ SOLID WASTE MANAGEMENT UNIT BOUNDARY
 - LCRC CLEANOUT

DESCRIPTION	
BY	
DATE	
NO.	
PROJECT DATE:	11/07/2011
PROJECT NO.:	FORD0166
DRAWN BY:	HMM
CHECKED BY:	TEP
TECHNICAL SKILL:	CREATIVE SPIRIT.
PREPARED FOR:	FORD MOTOR COMPANY
	MONROE PLANT MONROE, MICHIGAN
	GENERAL LAYOUT
1	1

Attachment 4

Aerial Photograph



ATTACHMENT IV
 AERIAL PHOTOGRAPHS
 FORD MOTOR COMPANY
 FORD RIVER RAISIN WAREHOUSE
 3200 EAST ELM AVENUE, CITY OF MONROE, MICHIGAN

Date
3/17

Drawn by
JPM

Design by
JPM

Project No
Ford0166



Approximate Scale 1"= 500'



0' 250 500' 1000'



ATTACHMENT IV
 AERIAL PHOTOGRAPHS
 FORD MOTOR COMPANY
 FORD RIVER RAISIN WAREHOUSE
 3200 EAST ELM AVENUE, CITY OF MONROE, MICHIGAN

Date
3/17

Drawn by
JPM

Design by
JPM

Project No
Ford0166

Attachment A1

General Facility Description

OTHER REQUIRED ATTACHMENTS
A1 – GENERAL FACILITY DESCRIPTION

SITE LOCATION AND DESCRIPTION

The Ford Motor Company (Ford) Ford River Raisin Warehouse (RRW) is located in the City of Monroe, Monroe County, Michigan (See Attachment III, Site Location Map). The site is located approximately 0.75 miles west of the western shore of Lake Erie, north of the mouth of the River Raisin. The River Raisin forms the southern boundary of the property, while an intake canal forms the northern boundary. Sterling State Park is adjacent to the intake canal along the northern boundary. Wetlands border the site to the east and west. The site is located away from residential areas, with the nearest residences located approximately 0.5 miles to the north of the property boundary.

The area of the Lake Erie shoreline near the site has a history of industrial use. Several industries are located in the vicinity of the site, including the Detroit Edison Monroe Power Plant, which is located across the River Raisin to the south, and the former Monroe Paper Company, which is located along the River Raisin (upgradient) approximately one mile to the west. In addition, the Port of Monroe and the City of Monroe landfills are located across the River Raisin to the southwest of the site.

SITE BACKGROUND

The first industrial use of the property was for a plant built by Newton Steel Company. The plant was built from 1927 to 1931. Newton Steel and later Republic Steel operated the plant as a steel mill until 1938 when the plant was closed. During the 1940's the plant was operated first by the Aluminum Company of America and then by Kelsey-Hayes Wheel Company, apparently for metal stamping and forging. Ford Motor Company purchased the property from Kelsey Hayes in 1950 and converted the steel mill into an automobile parts manufacturing facility. During the period of Ford ownership, the facility has produced coil springs, wheels, stabilizer bars, catalytic converter assemblies, headlamp housings, and chrome plated bumpers. As part of these production activities, Ford conducted electroplating operations and disposed of the resulting electroplating sludge in the on-site surface impoundments.

On July 18, 1994, Ford submitted a petition to the United States Environmental Protection Agency (USEPA) to designate a Corrective Action Management Unit (CAMU) in accordance with 40 CFR 264.552, an application to USEPA for a Resource Conservation and Recovery Act (RCRA) Post-Closure Permit, and application to MDEQ for an Act 64 Post-Closure Operating License. Ford received an Act 64 Post-Closure Operating License and RCRA Post-Closure Permit on March 27, 1995. Construction activities for the CAMU were initiated in 1995 and completed in 1999. As a result, two on-site containment units were created, the Eastern Containment Unit (ECU) and Western Containment Unit (WCU). These units are closed and post-closure monitoring activities are currently being performed in accordance with the *June 26, 2000, Post Closure Operating Plan* and the Act 64 Post-Closure Operating License (MID 005 057 005).

Potential soil impacts from the identified on-site SWMUs were investigated in accordance with the RAW-QAPP dated June 27, 1995, and subsequently revised on February 25, 1998. Investigation and remediation results from this effort are presented in MSG's *SWMU Report*, dated October 1999.

Potential ground water impacts from the on-site SWMUs have been investigated in accordance with the MDEQ approved *GIWP*, dated September 1, 1998, and the Act 64 Post-Closure Operating License. This investigation effort is documented in the *Final Ground Water Investigation Report*, dated July 26, 2002.

In June 2000, Visteon, formerly an enterprise of Ford, became an independent entity and assumed ownership and responsibility for on-going environmental work at the RRW. In October 2005, ACH assumed ownership and responsibility for on-going environmental work at the RRW. In October 2009, Ford assumed ownership and responsibility for on-going environmental work at the RRW.

**OTHER REQUIRED ATTACHMENTS
A1 – GENERAL FACILITY DESCRIPTION**

LIST OF PREVIOUS PERMITS, ENFORCEMENT ACTIONS AND FACILITY STUDIES

The Act 64 Post-Closure Operating License and RCRA Post-Closure Permit, (MID 005 057 005), are the primary permits for the site. Included below is a summary table of facility studies or reports that MSG is aware of that pertain to the RRW.

Author	Title	Date
USEPA	Memorandum Ford Monroe Stamping Plant Release Assessment	March 5, 1998
NTH	Investigation Report of Former West Lagoon	April 11, 1996
NTH	Permits Closure of Surface Impoundments	May 23, 1995
NTH	Post-Closure Operating License Application Volume II – Closure Plan	July 18, 1994
NTH	Volume 2 – Appendices Release Assessment Work Plan and Quality Assurance Project Plan	June 27, 1995 Revised February 25, 1998
MEC	Ground Water Investigation Work Plan - Ford Monroe Stamping Plant	September 1, 1998
MEC	Solid Waste Management Units (SWMU) Investigation Project Update	June 3, 1999
MEC	Report of the Ground Water Investigation Project at Monroe Stamping Plant – Volume I	August 6, 1999
MEC	Closure Certification Report, Surface Impoundment Closure Project	September 9, 1999
MEC	Interim Ground Water Investigation Report	August 24, 2000
MEC	Annual Ground Water Report	2001
IT	Storm Water Pollution Prevention Plan	January 27, 2000
HRC	RCRA Contingency/SPCC/PIPP Plan	October 4, 1994 Revised July 31, 2000
MSG	Soil Investigation Report of Solid Waste Management Units	October 1999
MSG	RCRA Facility Investigation Work Plan	August 28, 2000 Revised March 5, 2001
MSG	RCRA Facility Investigation Health & Safety Plan	April 30, 2001
MSG	RCRA Facility Investigation Report	February 28, 2002
MSG	RCRA Facility Investigation Attachments	July 26, 2002
MSG	Post-Closure & Corrective Action	July 9, 2003
MSG	Additional MDEQ Required RCRA Facility Investigation Activities	March 22, 2004
MSG	Supplemental RCRA Facility & Ground Water Investigation Work Plan	March 22, 2004
MSG	Quality Assurance Project Plan - RFI	August 28, 2000 Revised March 7, 2001
MSG	Conceptual Ground Water Flow Modeling Report	November 2, 2001
MSG	Final Ground Water Investigation Report	July 26, 2002
MSG	Ground Water Flow Model Report	December 17, 2002
MSG	Post-Closure Operating License Application, Volume III – Post-Closure Plan	June 26, 2000
MSG	Post-Closure Operating License Application, Volume III – Post-Closure Plan	June 30, 2003
MSG	Post-Closure Operating License Application Report	September 16, 2003
MSG	Interim Ground Water Investigation Report	August 24, 2000
MSG	Interim Ground Water Investigation Report 2	March 6, 2001
MSG	Interim Ground Water Investigation Report 3	April 12, 2001
MSG	Interim Ground Water Investigation Report 4	May 21, 2001
MSG	Interim Ground Water Investigation Report 5	August 1, 2001
MSG	Interim Ground Water Investigation Report 6	November 2, 2001
MSG	Interim Ground Water Investigation Report 7	January 24, 2002
MSG	Interim Ground Water Investigation Report 8	February 28, 2002
MSG	Hydraulic Monitoring Report – February 2002	April 16, 2002
MSG	Hydraulic Monitoring Report – June 2002	July 23, 2002
MSG	Hydraulic Monitoring Report – September 2002	November 22, 2002
MSG	Hydraulic Monitoring Report – December 2002	February 11, 2003
MSG	Hydraulic Monitoring Report – March 2003	May 28, 2003
MSG	Hydraulic Monitoring Report – June 2003	August 5, 2003
MSG	Hydraulic Monitoring Report – September 2003	September 30, 2003
MSG	Hydraulic Monitoring Report – November 2003	February 18, 2004
MSG	Hydraulic Monitoring Report – February 2004	June 4, 2004
MSG	Hydraulic Monitoring Report – June 2004	July 27, 2004

**OTHER REQUIRED ATTACHMENTS
A1 – GENERAL FACILITY DESCRIPTION**

MSG	Hydraulic Monitoring Report – September 2004	November 10, 2004
MSG	Hydraulic Monitoring Report – December 2004	February 14, 2005
MSG	Hydraulic Monitoring Report – March 2005	May 31, 2005
MSG	Hydraulic Monitoring Report – June 2005	July 28, 2005
MSG	Hydraulic Monitoring Report – September 2005	December 30, 2005
MSG	Hydraulic Monitoring Report – December 2005	February 6, 2006
MSG	Hydraulic Monitoring Report – March 2006	May 25, 2006
MSG	Hydraulic Monitoring Report – June 2006	August 14, 2006
MSG	Hydraulic Monitoring Report – September 2006	January 17, 2007
MSG	Hydraulic Monitoring Report – December 2006	February 23, 2007
MSG	Hydraulic Monitoring Report – March 2007	July 27, 2007
MSG	Hydraulic Monitoring Report – June 2007	November 5, 2007
MSG	Hydraulic Monitoring Report – September 2007	October 8, 2007
MSG	Hydraulic Monitoring Report – December 2007	February 29, 2008
MSG	Hydraulic Monitoring Report – March 2008	May 27, 2008
MSG	Hydraulic Monitoring Report – June 2008	September 17, 2008
MSG	Hydraulic Monitoring Report – September 2008	November 12, 2008
MSG	Hydraulic Monitoring Report – December 2008	January 30, 2009
MSG	Hydraulic Monitoring Report – March 2009	April 13, 2009
MSG	Hydraulic Monitoring Report – June 2009	August 31, 2009
MSG	Hydraulic Monitoring Report – September 2009	December 31, 2009
MSG	Hydraulic Monitoring Report – December 2009	February 11, 2010
MSG	Hydraulic Monitoring Report – March 2010	May 7, 2010
MSG	Hydraulic Monitoring Report – May 2010	July 12, 2010
MSG	Hydraulic Monitoring Report – September 2010	November 2, 2010
MSG	Hydraulic Monitoring Report – December 2010	February 15, 2011
MSG	Hydraulic Monitoring Report – March 2011	May 12, 2011
MSG	Hydraulic Monitoring Report – June 2011	July 29, 2011
MSG	Hydraulic Monitoring Report – September 2011	November 15, 2011
MSG	Hydraulic Monitoring Report – December 2011	February 1, 2012
MSG	Hydraulic Monitoring Report – March 2012	May 30, 2012
MSG	Hydraulic Monitoring Report – June 2012	August 8, 2012
MSG	Hydraulic Monitoring Report – October 2012	December 11, 2012
MSG	Hydraulic Monitoring Report – December 2012	January 25, 2013
MSG	Hydraulic Monitoring Report – March 2013	March 26, 2013
MSG	Hydraulic Monitoring Report – June 2013	August 6, 2013
MSG	Hydraulic Monitoring Report – September 2013	October 25, 2013
MSG	Hydraulic Monitoring Report – December 2013	January 31, 2014
MSG	Hydraulic Monitoring Report – March 2014	April 30, 2014
MSG	Hydraulic Monitoring Report – June 2014	July 25, 2014
MSG	Hydraulic Monitoring Report – September 2014	October 24, 2014
MSG	Hydraulic Monitoring Report – December 2014	February 6, 2015
MSG	Hydraulic Monitoring Report – March 2015	April 27, 2015
MSG	Hydraulic Monitoring Report – May 2015	July 24, 2015
MSG	Hydraulic Monitoring Report – September 2015	October 5, 2015
MSG	Hydraulic Monitoring Report – November 2015	December 3, 2015
MSG	Hydraulic Monitoring Report – March 2016	May 10, 2016
MSG	Hydraulic Monitoring Report – June 2016	July 25, 2016
MSG	Hydraulic Monitoring Report – September 2016	November 7, 2016
MSG	Hydraulic Monitoring Report – December 2016	January 24, 2017
MSG	Environmental Monitoring Report – Round 1	April 28, 2000
MSG	Environmental Monitoring Report – Round 2	October 25, 2000
MSG	Environmental Monitoring Report – Round 3	February 16, 2001
MSG	Environmental Monitoring Report – Round 4	July 12, 2001
MSG	Environmental Monitoring Report – Round 5	November 2, 2001
MSG	Environmental Monitoring Report – Round 6	April 8, 2002
MSG	Environmental Monitoring Report – Round 7	April 29, 2002
MSG	Environmental Monitoring Report – Round 8	July 12, 2002

**OTHER REQUIRED ATTACHMENTS
A1 – GENERAL FACILITY DESCRIPTION**

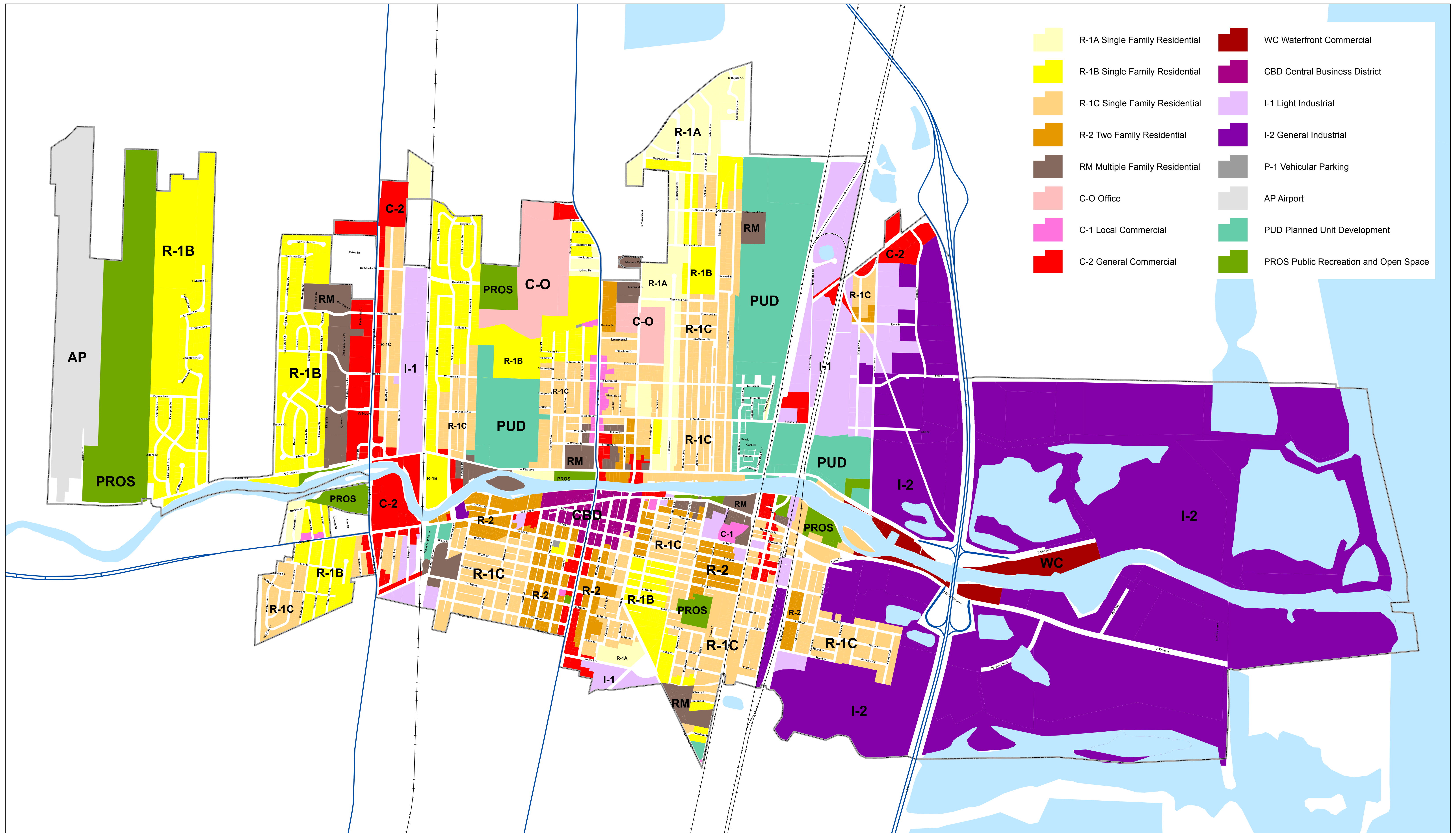
MSG	Environmental Monitoring Report – Round 9	February 28, 2003
MSG	Environmental Monitoring Report – Round 10	August 13, 2003
MSG	Environmental Monitoring Report – Round 11	February 18, 2004
MSG	Environmental Monitoring Report – Round 12	July 30, 2004
MSG	Environmental Monitoring Report – Round 13	January 17, 2005
MSG	Environmental Monitoring Report – Round 14	July 28, 2005
MSG	Environmental Monitoring Report – Round 15	February 6, 2006
MSG	Environmental Monitoring Report – Round 16	August 12, 2006
MSG	Environmental Monitoring Report – Round 17	February 23, 2007
MSG	Environmental Monitoring Report – Round 18	September 10, 2007
MSG	Environmental Monitoring Report – Round 19	February 29, 2008 Revised June 17, 2008
MSG	Environmental Monitoring Report – Round 20	September 30, 2008
MSG	Environmental Monitoring Report – Round 21	February 25, 2009
MSG	Environmental Monitoring Report – Round 22	November 18, 2009
MSG	Environmental Monitoring Report – Round 23	February 11, 2010
MSG	Environmental Monitoring Report – Round 24	August 12, 2010
MSG	Environmental Monitoring Report – Round 25	February 18, 2011
MSG	Environmental Monitoring Report – Round 26	August 18, 2011
MSG	Environmental Monitoring Report – Round 27	February 22, 2012
MSG	Environmental Monitoring Report – Round 28	September 26, 2012
MSG	Environmental Monitoring Report – Round 29	February 20, 2013
MSG	Environmental Monitoring Report – Round 30	September 12, 2013
MSG	Environmental Monitoring Report – Round 31	February 2, 2014
MSG	Environmental Monitoring Report – Round 32	September 26, 2014
MSG	Environmental Monitoring Report – Round 33	February 20, 2015
MSG	Environmental Monitoring Report – Round 34	July 20, 2015
MSG	Environmental Monitoring Report – Round 35	January 26, 2016
MSG	Environmental Monitoring Report – Round 36	September 16, 2016
MSG	Environmental Monitoring Report – Round 37	January 27, 2017
MSG	Annual Ground Water Report – 2000 (Year 1)	February 28, 2001
MSG	Annual Ground Water Report – 2001 (Year 2)	February 28, 2002, Revised May 31, 2002
MSG	Annual Ground Water Report – 2002 (Year 3)	February 26, 2003
MSG	Annual Ground Water Report – 2003 (Year 4)	February 27, 2004
MSG	Annual Ground Water Report – 2004 (Year 5)	February 28, 2005
MSG	Annual Ground Water Report – 2005 (Year 6)	February 23, 2006
MSG	Annual Ground Water Report – 2006 (Year 7)	February 23, 2007
MSG	Annual Ground Water Report – 2007 (Year 8)	February 29, 2008
MSG	Annual Ground Water Report – 2008 (Year 9)	February 25, 2009
MSG	Annual Ground Water Report – 2009 (Year 10)	February 11, 2010
MSG	Annual Ground Water Report – 2010 (Year 11)	February 28, 2011
MSG	Annual Ground Water Report – 2011 (Year 12)	February 24, 2012
MSG	Annual Ground Water Report – 2012 (Year 13)	March 1, 2013
MSG	Annual Ground Water Report – 2013 (Year 14)	February 21, 2014
MSG	Annual Ground Water Report – 2014 (Year 15)	February 20, 2015
MSG	Annual Ground Water Report – 2015 (Year 16)	February 17, 2016
MSG	Annual Ground Water Report – 2016 (Year 17)	January 24, 2017
MSG	Annual Inspection and Maintenance Report 2000	August 15, 2000
MSG	Annual Inspection and Maintenance Report 2001	January 4, 2002
MSG	Annual Inspection and Maintenance Report 2002	August 12, 2002
MSG	Annual Inspection and Maintenance Report 2003	August 13, 2003
MSG	Annual Inspection and Maintenance Report 2004	July 30, 2004
MSG	Annual Inspection and Maintenance Report 2005	August 10, 2005
MSG	Annual Inspection and Maintenance Report 2006	August 10, 2006
MSG	Annual Inspection and Maintenance Report 2007	June 17, 2008
MSG	Annual Inspection and Maintenance Report 2008	February 25, 2009
MSG	Annual Inspection and Maintenance Report 2009	February 11, 2010

**OTHER REQUIRED ATTACHMENTS
A1 – GENERAL FACILITY DESCRIPTION**

MSG	Annual Inspection and Maintenance Report 2010	February 28, 2011
MSG	Annual Inspection and Maintenance Report 2011	January 31, 2012
MSG	Annual Inspection and Maintenance Report 2012	March 7, 2013
MSG	Annual Inspection and Maintenance Report 2013	February 21, 2014
MSG	Annual Inspection and Maintenance Report 2014	February 20, 2015
MSG	Annual Inspection and Maintenance Report 2015	February 17, 2016
MSG	Annual Inspection and Maintenance Report 2016	January 24, 2017
MSG	Annual Leachate Monitoring Report 2000	August 15, 2000
MSG	Annual Leachate Monitoring Report 2001	January 4, 2002
MSG	Annual Leachate Monitoring Report 2002	August 12, 2002
MSG	Annual Leachate Monitoring Report 2003	August 5, 2003
MSG	Annual Leachate Monitoring Report 2004	July 27, 2004
MSG	Annual Leachate Monitoring Report 2005	August 8, 2005
MSG	Annual Leachate Monitoring Report 2006	August 10, 2006
MSG	Annual Leachate Monitoring Report 2007	February 29, 2008
MSG	Annual Leachate Monitoring Report 2008	February 25, 2009
MSG	Annual Leachate Monitoring Report 2009	February 1, 2010
MSG	Annual Leachate Monitoring Report 2010	February 28, 2011
MSG	Annual Leachate Monitoring Report 2011	January 31, 2012
MSG	Annual Leachate Monitoring Report 2012	February 20, 2013
MSG	Annual Leachate Monitoring Report 2013	February 21, 2014
MSG	Annual Leachate Monitoring Report 2014	February 20, 2015
MSG	Annual Leachate Monitoring Report 2015	February 26, 2016
MSG	Annual Leachate Monitoring Report 2016	January 24, 2017
MSG	2000 Annual Certification of Post-Closure Care	January 2001
MSG	2001 Annual Certification of Post-Closure Care	January 2002
MSG	2002 Annual Certification of Post-Closure Care	January 23, 2003
MSG	2003 Annual Certification of Post-Closure Care	January 28, 2004
MSG	2004 Annual Certification of Post-Closure Care	March 17, 2005
MSG	2005 Annual Certification of Post-Closure Care	February 7, 2006
MSG	2006 Annual Certification of Post-Closure Care	January 22, 2007
MSG	2007 Annual Certification of Post-Closure Care	February 1, 2008
MSG	2008 Annual Certification of Post-Closure Care	December 31, 2008
MSG	2009 Annual Certification of Post-Closure Care	February 8, 2010
MSG	2010 Annual Certification of Post-Closure Care	March 11, 2011
MSG	2011 Annual Certification of Post-Closure Care	February 15, 2012
MSG	2012 Annual Certification of Post-Closure Care	January 28, 2013
MSG	2013 Annual Certification of Post-Closure Care	April 16, 2013
MSG	2014 Annual Certification of Post-Closure Care	April 17, 2015
MSG	2015 Annual Certification of Post-Closure Care	January 27, 2016
MSG	2016 Annual Certification of Post-Closure Care	January 27, 2017
MSG	Integrity Verification Report for Year 1 of Post-Closure Monitoring	March 21, 2001
MSG	Follow-up Integrity Verification Report for Year 1 of Post-Closure Monitoring	January 31, 2002
MSG	Integrity Verification Report for Year 2 of Post-Closure Monitoring	July 23, 2002
MSG	Integrity Verification Report for Year 3 of Post-Closure Monitoring	August 1, 2003
MSG	Integrity Verification Report for Year 4 of Post-Closure Monitoring	July 27, 2004
MSG	Integrity Verification Report for Year 5 of Post-Closure Monitoring	October 31, 2005
MSG	Integrity Verification Report for Year 6 of Post-Closure Monitoring	2006
MSG	Integrity Verification Report for Year 7 of Post-Closure Monitoring	February 23, 2007
MSG	Integrity Verification Report for Year 8 of Post-Closure Monitoring	February 28, 2008
MSG	Integrity Verification Report for Year 9 of Post-Closure Monitoring	November 21, 2009
MSG	Integrity Verification Report for Year 10 of Post-Closure Monitoring	2010
MSG	Integrity Verification Report for Year 11 of Post-Closure Monitoring	February 15, 2011
MSG	Integrity Verification Report for Year 12 of Post-Closure Monitoring	December 15, 2012
MSG	Integrity Verification Report for Year 13 of Post-Closure Monitoring	November 9, 2012 Addendum December 5, 2005
MSG	Integrity Verification Report for Year 14 of Post-Closure Monitoring	September 16, 2013
MSG	Integrity Verification Report for Year 15 of Post-Closure Monitoring	October 9, 2014

**OTHER REQUIRED ATTACHMENTS
A1 – GENERAL FACILITY DESCRIPTION**

MSG	Integrity Verification Report for Year 16 of Post-Closure Monitoring	September 21, 2015
MSG	Integrity Verification Report for Year 17 of Post-Closure Monitoring	October 21, 2016
MSG	Removal of Sediment from Leachate Manholes	September 1, 2003
MSG	Removal of Sediment from Leachate Manholes	July 22, 2004
MSG	Second Biennial Final Cover and Benchmark Survey	June 23, 2003
MSG	Vegetative Control Measures Letter	August 28, 2003
MSG	SCU Leachate Removal Letter	September 30, 2003
MSG	Erosion Repair Activities – Burrow Holes Letter	September 30, 2003
MSG	Ground Water Monitor Well Abandonment	November 3, 2003
MSG	CQA Plan for Interim Response Activities for the Empty Drum Storage Area	December 9, 2003
MSG	Interim Bid Package for the Empty Drum Storage Area	December 15, 2003
MSG	Fourth Biennial Final Cover and Benchmark Survey	May 8, 2008
MSG	Fifth Biennial Final Cover and Benchmark Survey	October 2012
MSG	Additional Environmental Sampling Ford Motor Company, Monroe Plant	April 25, 2011
MSG	Post-Closure Leachate Sampling	June 17, 2011
MSG	Ground Water Operation and Maintenance (O&M) Inspection Report	April 28, 2014
MSG	Post-Closure Leachate Sampling	September 26, 2016 Revised January 17, 2017
MSG	Additional Environmental Sampling Ford Motor Company, Monroe Plant	September 10, 2015
MSG	Additional Environmental Sampling Ford Motor Company, Monroe Plant	March 16, 2016
MSG	Additional Environmental Sampling Ford Motor Company, Monroe Plant	January 18, 2017



Disclaimer: This zoning map features a representative scale and is not intended to be substituted for an official survey or used to resolve boundary or area issues. Consult official City of Monroe records for dimensions and areas of parcels and boundaries.

Date: 19 September 2016
Sources: City of Monroe Assessor's Office, MCGI



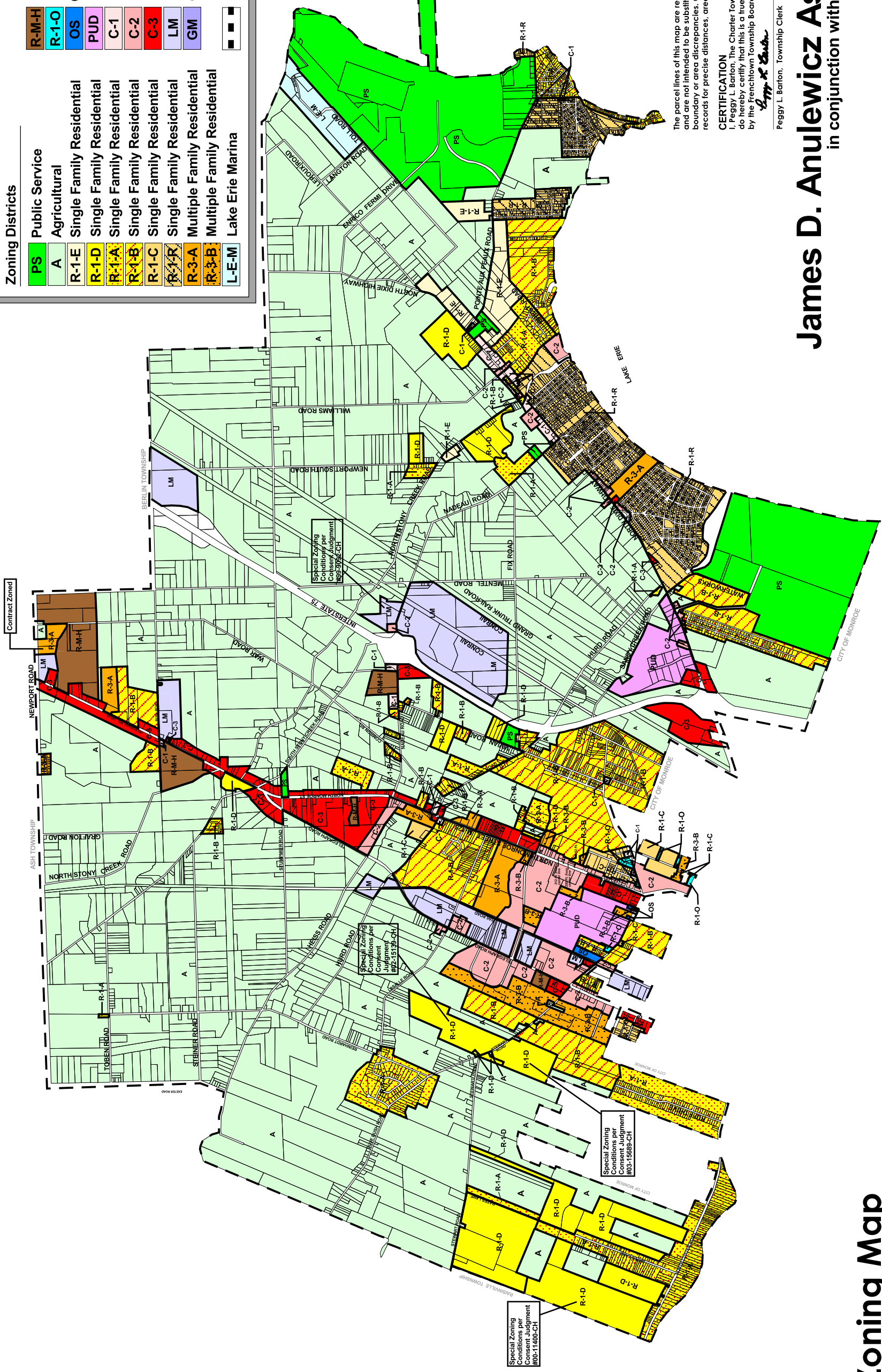
1 inch = 1,000 feet

Official Zoning Map

City of Monroe

Frenchtown Charter Township, Monroe County, Michigan

Zoning Districts	
PS	Public Service
A	Agricultural
R-1-E	Single Family Residential
R-1-D	Single Family Residential
R-1-A	Single Family Residential
R-1-B	Single Family Residential
R-1-C	Single Family Residential
R-1-R	Single Family Residential
R-3-A	Multiple Family Residential
R-3-B	Multiple Family Residential
L-E-M	Lake Erie Marina
R-M-H	Mobile Home Park
R-1-O	Restricted Office
OS	Office Service
PUD	Planned Unit Development
C-1	Local Commercial
C-2	General Commercial
C-3	Highway Commercial
LM	Light Manufacturing
GM	General Manufacturing
■ ■ ■	Frenchtown Boundary



The parcel lines of this map are representational of the actual parcel lines and are not intended to be substituted for an official survey or used to resolve boundary or area discrepancies. Consult official Charter Township of Frenchtown records for precise distances, areas of parcels and boundaries.

CERTIFICATION
 I, Peggy L. Barton, The Charter Township of Frenchtown Clerk, do hereby certify that this is a true copy of the map adopted by the Frenchtown Township Board, on the 10th day of November, 2003.

Peggy L. Barton
 Peggy L. Barton, Township Clerk

James D. Anulewicz Associates Inc.
 in conjunction with McKenna Associates, Inc.

Basemap Source: McKenna Associates, Inc. 4/2002
 Data Source: Frenchtown Township

Zoning Map



Revision date 1/19/04 illustrates the current zoning map as of this date up to and including amendment map number 17-05.

Attachment A2

Chemical and Physical Analysis

**FORM EQP 5111 ATTACHMENT TEMPLATE A2
CHEMICAL AND PHYSICAL ANALYSES**

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, and R 299.9605, and Title 40 of the Code of Federal Regulations (CFR) §§264.13(a) and 270.14(b)(2), establish requirements for chemical and physical analyses at hazardous waste management facilities. All references to the 40 CFR citations specified herein are adopted by reference in R 299.11003

This license application template addresses requirements for chemical and physical analyses at the hazardous waste management facility for the River Raisin Warehouse in Monroe, Michigan. The information included in the template demonstrates how the facility meets the chemical and physical analyses requirements for hazardous waste management facilities.

Type of applicant: *(Check as appropriate)*

- Applicant for Operating License for Existing Facility
- Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

Type of Facility: *(Check as appropriate)*

- On-site Facility (generates hazardous waste)
- Off-site Facility (accepts hazardous waste from other generators)

Type of Units to be Constructed or Operated at the Facility: *(Check as appropriate)*

- Containers
- Tank(s)
- Waste Pile(s)
- Landfilled Waste
- Waste Incineration
- Land Treatment
- Miscellaneous Unit(s)
- Boilers and Industrial Furnaces

This template is organized as follows:

A2.A WASTE DESCRIPTION

A2.A.1 Waste Description (*generate on-site wastes*)

A2.A.2 Waste Description (*receive wastes from off-site generators*)

A2.A.2(a) Procedures for Obtaining Chemical and Physical Analyses from Off-Site
Generators

Table A2.A.1 Hazardous Waste Generated at the Facility

Attachment A2.A.1 Laboratory Report Detailing Chemical and Physical Analyses of
Representative Samples

Table A2.A.2 Hazardous Wastes Accepted at the Facility

A2.B CONTAINERIZED WASTE

A2.B.1 Wastes Compatible with Container

A2.B.2 Containers without Secondary Containment System

A2.C WASTE IN TANK SYSTEMS

A2.C.1 Wastes Compatible with Tanks

A2.C.2 Tanks without Secondary Containment System

A2.D WASTE IN PILES

A2.D.1 Waiver from Waste Pile Requirements

A2.E LANDFILLED WASTES

A2.E.1 Containerized or Bulk Wastes

A2.E.2 Procedures to Determine Addition of Biodegradable Sorbent

A2.F WASTES INCINERATED AND WASTES USED IN PERFORMANCE TESTS

Attachment A2.F.1 Analyses of Wastes Incinerated and Used in Performance Tests

A2.G WASTES TO BE LAND TREATED

A2.G.1 Treatment Zone Demonstration

A2.G.2 Food Chain Crops Grown In or On Treatment Zone

A2.H WASTE IN MISCELLANEOUS UNITS

A2.I WASTE IN BOILERS AND INDUSTRIAL FURNACES

Table A2.I.1 Waste Feed Streams: Hazardous Waste, Other Fuels, and Industrial
Furnace Feed Stocks

Table A2.I.2 Hazardous Waste Feed Streams

Attachment A2.I.1 Blending Prior to Firing

A2.A WASTE DESCRIPTION

[R 299.9504(1)(c) and 40 CFR §270.14(b)(2)]

A2.A.1 Waste Description (generate on-site wastes)

[R 299.9504(1)(c) and 40 CFR §270.14(b)(2)]

Due to the closed status of the two on-site containment units (Eastern Containment Unit and Western Containment Unit), this facility does not accept waste. See Post Closure Operating License Application, Vol.2 – Closure Plan, Section 2.0, Description of Facility and Closure, NTH Consultants, LTD, July 18, 1994.

A2.A.2 Waste Description (receive wastes from off-site generators)

[R 299.9504(1)(c) and 40 CFR §270.14(b)(2)]

A2.A.2(a) Procedures for Obtaining Chemical and Physical Analyses from Off-Site Generators

Not applicable.

Table A2.A.1 Hazardous Waste Generated at the Facility (page 7)

Attachment A2.A.1 Laboratory Report Detailing Chemical and Physical Analyses of Representative Samples

See Post Closure Operating License Application, Vol.2 – Closure Plan, Section 2.0, Description of Facility and Closure, NTH Consultants, LTD, July 18, 1994.

Table A2.A.2 Hazardous Wastes Accepted at the Facility (page 8)

A2.B CONTAINERIZED WASTE

[R 299.9504(1)(c) and 40 CFR §264.172]

A2.B.1 Wastes Compatible with Container

Not applicable.

A2.B.2 Containers without Secondary Containment System

Not applicable.

A2.C WASTE IN TANK SYSTEMS

[R 299.9504(1)(c) and 40 CFR §§264.190(a), 264.191(b)(2), 264.192(a)(2)]

A2.C.1 Wastes Compatible with Tanks

Not applicable.

A2.C.2 Tanks without Secondary Containment System

Not applicable.

A2.D WASTE IN PILES

[R 299.9504(1)(c) and 40 CFR §264.250(c)(1) and (4)]

A2.D.1 Waiver from Waste Pile Requirements

Not applicable.

A2.E LANDFILLED WASTES

[R 99.9504(1)(c) and 40 CFR §§264.13(c)(3) and 264.314]

A2.E.1 Containerized or Bulk Wastes

Not applicable.

A2.E.2 Procedures to Determine Addition of Biodegradable Sorbent

Not applicable.

A2.F WASTES INCINERATED AND WASTES USED IN PERFORMANCE TESTS

[R 299.9504(1)(c) and 40 CFR §264.341]

Attachment A2.F.1 Analyses of Wastes Incinerated and Used in Performance Tests

Not applicable.

A2.G WASTES TO BE LAND TREATED

[R 299.9504(1)(c) and 40 CFR §§264.271(a)(1) and (2), 264.272, and 264.276]

A2.G.1 Treatment Zone Demonstration

Not applicable.

A2.G.2 Food Chain Crops Grown In or On Treatment Zone

Not applicable.

A2.H WASTE IN MISCELLANEOUS UNITS

[R 299.9504(1)(c) and 40 CFR §270.13(d)]

Not applicable.

A2.I WASTE IN BOILERS AND INDUSTRIAL FURNACES

Table A2.I.1 Waste Feed Streams: Hazardous Waste, Other Fuels, and Industrial Furnace Feed Stocks

Table A2.I.2 Hazardous Waste Feed Streams (page 10)

Attachment A2.I.1 Blending Prior to Firing

Not applicable.

TABLE A2.A.1 HAZARDOUS WASTE GENERATED AT THE FACILITY

Hazardous Waste Code	Waste Description	Hazardous Waste Characteristics	Basis for Hazardous Designation	Hazardous Waste Management Unit
F006	Electroplating Sludge	Toxic	Toxic	ECU &WCU

TABLE A2.A.2 HAZARDOUS WASTES ACCEPTED AT THE FACILITY

Hazardous Waste Code	Waste Description	Hazardous Waste Characteristics	Basis for Hazardous Designation	Hazardous Waste Management Unit
NA	NA	NA	NA	NA

TABLE A2.I.1 WASTE FEED STREAMS: HAZARDOUS WASTE, OTHER FUELS, AND INDUSTRIAL FURNACE FEED STOCKS

Hazardous Waste Code	Heating Value	Level of Antimony/ Arsenic	Level of Barium/ Beryllium	Level of Cadmium/ Chromium	Level of Lead/ Mercury	Level of Silver/ Thallium	Total Chlorine/ Chloride	Ash	Viscosity or Description of Physical Form of the Feed Stream
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE A2.I.2 HAZARDOUS WASTE FEED STREAMS

Hazardous Waste Code	Appendix VIII Constituents Reasonably Expected	Approximate Quantification of Hazardous Constituents Identified
NA	NA	NA

Attachment A3

Waste Analysis Plan

**OTHER REQUIRED ATTACHMENTS
A3 – WASTE ANALYSIS PLAN**

WASTE ANALYSIS PLAN

Attachment A3 is not applicable due to the closed status of the two on-site containment units (Eastern Containment Unit and Western Containment Unit). This facility does not accept waste.

See Post Closure Operating License Application, Vol.2 – Closure Plan, Section 2.0, Description of Facility and Closure, NTH Consultants, LTD, July 18, 1994.

Attachment A4

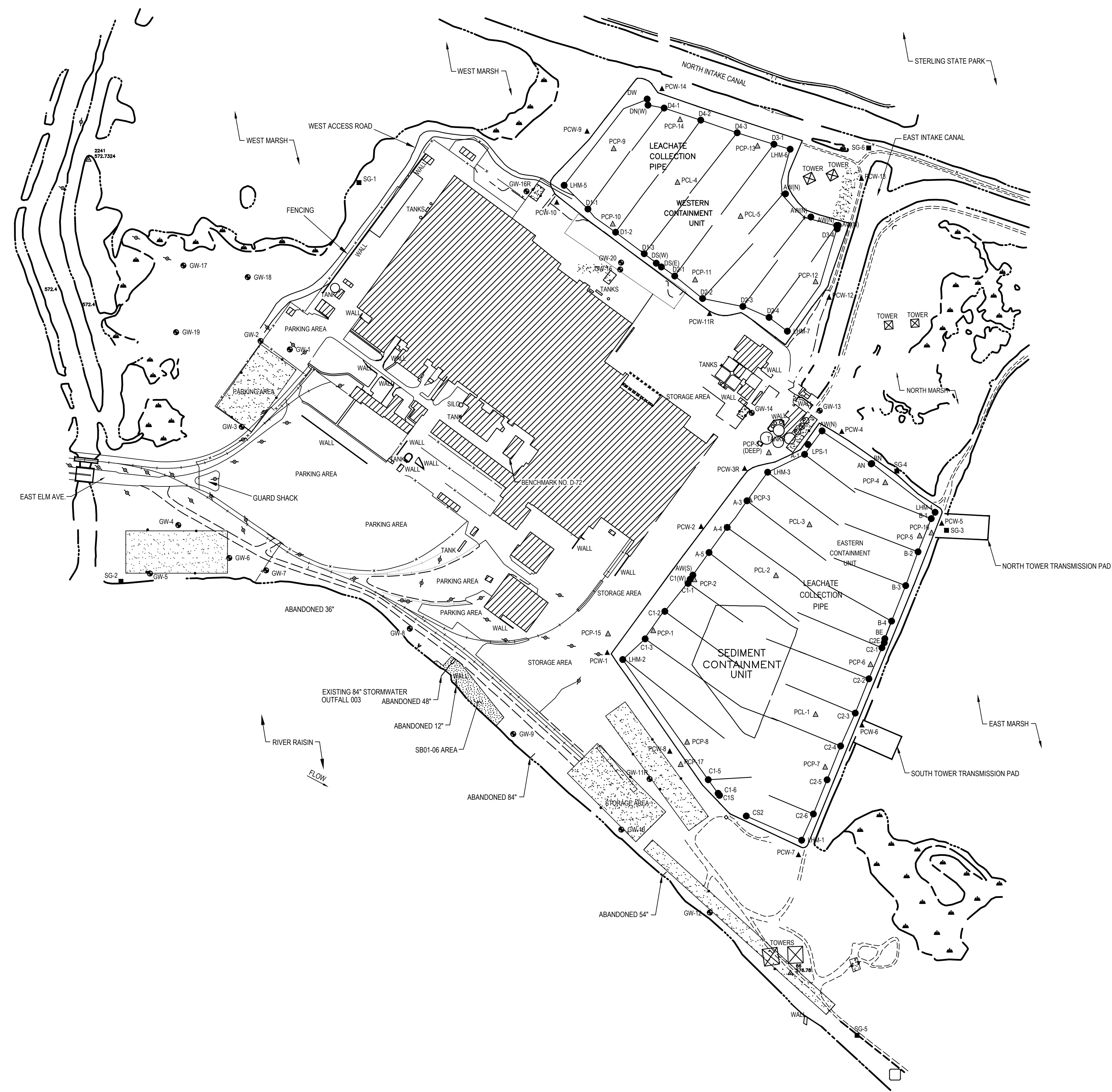
Security Procedures and Equipment

OTHER REQUIRED ATTACHMENTS
A4 – SECURITY PROCEDURES AND EQUIPMENT

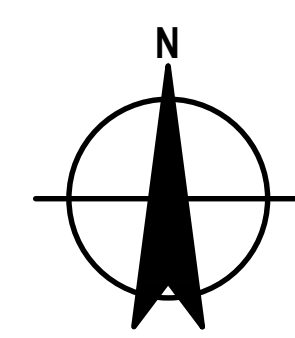
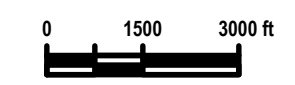
SECURITY PROCEDURES AND EQUIPMENT

Existing security measures at the Ford River Raisin Warehouse (RRW) site will be continued during the post-closure period to minimize the possibility of unauthorized entry or activity in the containment unit areas. See attached Figure outlining security measures. The security system consists of a combination of the following measures:

1. Surveillance - A 24-hour surveillance system, comprised of facility guards, continuously monitors and controls entry into the facility.
2. Barriers - The facility is located on a peninsula such that open water and marshes form a natural barrier around most of the facility. A chain-link fence extends along the west side of the facility and forms a barrier across the neck of the peninsula.
3. Access Control - The facility is accessed at the main RRW gate, which is manned by a 24-hour security guard. A strict check-in procedure is enforced and only employees and other personnel performing required activities at the facility are admitted.
4. General Facility Warning Signs - Warning signs to deter unauthorized persons from the RRW property are posted at the gate and at other locations around the property perimeter in sufficient numbers to be seen from any approach to the facility. The legend "Private Property - No Trespassing" is legible from a distance of at least 25 feet.
5. Containment Unit Warning Signs - To ensure that unauthorized personnel or visitors do not disturb the containment units, signs are posted at regular intervals along the perimeter of each containment unit. These signs bear the legend "Restricted Area, Unauthorized Personnel Keep Out", which is legible from a distance of 25 feet. In addition, on-site SWMUs are also clearly identified with warning signs posted.
6. Monitoring Well/Piezometer Security - A steel cover with a padlock was placed over the top of each monitoring well or piezometer casing and cemented into place. Prior to each well being sampled or each piezometer being measured, the well/piezometer is inspected for damage or signs of attempted access. In the unlikely event that such is the case, the source of the problem will be immediately investigated and steps will be taken to correct the situation. Problems discovered and the corrective measures taken will be documented on the facility operating log.
7. Preventative Measures - The facility security measures, containment unity, and ground water monitoring system will be properly maintained, and any inadequacies detected during scheduled inspections or at any other time will be required in a timely manner. Signs will be replaced as they become illegible. Soil at the base of the fence will be re-graded as needed to maintain a maximum gap of 12 inches. The fence will be repaired or replaced as necessary to maintain adequate facility security. Access to monitoring wells, piezometers, benchmarks and other site areas will be maintained by mowing and grading access roads as necessary.



- LEGEND:**
- GW-# GROUND WATER INVESTIGATION MONITORING WELL
 - ▲ PCP-# POST-CLOSURE PIEZOMETER
 - ▲ PCL-# POST-CLOSURE DETECTION MONITORING WELL
 - ▲ PCW-# POST-CLOSURE DETECTION MONITORING WELL
 - SG-# SURFACE WATER LEVEL MONITORING STATION
 - LHM-# LCRS MANHOLE WITH DESIGNATION
 - CUTOFF WALL
 - LEACHATE COLLECTION PIPE (6")
 - ▭ SOLID WASTE MANAGEMENT UNIT BOUNDARY
 - LCRC CLEANOUT
 - STORMWATER SAMPLE LOCATION
 - x — FENCING



FORD MONROE
MONROE, MICHIGAN

Project No. 11224408
Date October 2021

SITE PLAN

FIGURE 1

Attachment A5

Inspection Schedule

**FORM EQP 5111 ATTACHMENT TEMPLATE A5
INSPECTION REQUIREMENTS**

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), being R 299.9504, R 299.9508, R 299.9605 and Title 40 of the Code of Federal Regulations (CFR) §§264.15 and 270.14(b)(5), establish requirements for inspections at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003

This license application template addresses requirements for inspections at the following hazardous waste management facility: River Raisin Warehouse in Monroe, Michigan. (Check as appropriate)

- Applicant for Operating License for Existing Facility
- Applicant for Operating License for New, Altered, Enlarged, or Expanded Facility

This template is organized as follows:

INTRODUCTION

A5.A WRITTEN SCHEDULE

A5.A.1 Types of Problems

A5.A.2 Frequency of Inspection

A5.B REMEDY SCHEDULE

A5.C INSPECTION LOG OR SUMMARY

ATTACHMENT INSPECTION LOGS

ATTACHMENT MAINTENANCE LOGS

INTRODUCTION

[R 299.9605 and 40 CFR §264.15(a)].

This section presents information pertaining to inspection and maintenance performed for the Western Containment Unit (WCU) and the Eastern Containment Unit (ECU) at the Ford River Raisin Warehouse (RRW). Post-closure monitoring activities were initiated on March 15, 2000 and were conducted in accordance with procedures specified in the Post-Closure Operating License Application, Volume III - Post Closure Plan, dated June 26, 2000.

Information regarding detailed inspection activities is contained in the Post Closure Plan, which is included as Attachment A11 of this application.

A5.A WRITTEN SCHEDULE

[R 299.9605 and 40 CFR §264.15(b)(1)]

The Post-Closure Plan identifies four types of inspections to be performed: weekly, monthly, semi-annual and annual. During weekly inspections, a general visual inspection of the containment units and selected leachate collection system components will be performed. The containment units will be checked for general operation and function. If any items are found to be deficient, they are noted on the inspection log and described further at the end of the log.

The monthly and semi-annual inspections will include all items checked during the weekly inspections in addition to a detailed inspection of the post-closure groundwater monitoring system, further items of the leachate collection system, and a measurement of the sediment containment unit (SCU) leachate level. The annual inspections will include all items checked during the monthly or semi-annual inspections in addition to the confirmation that integrity verification of leachate collection piping has been within the last 12 months for the ECU and WCU. Just as with the weekly inspections, any deficient items will be described at the end of the log. The weekly, monthly, semi-annual, and annual inspection logs are attached.

Additional specific detailed information regarding inspection schedules is contained in the Post Closure Plan, which is included as an Attachment A11 of this application.

A5.A.1 Types of Problems

[R 299.9605 and 40 CFR §264.15(b)(3)]

Inspections of the cover system in place on the ECU and WCU will be completed on a weekly, monthly, semi-annual and annual basis. Qualified personnel will visually inspect both the ECU and WCU by traversing the units on foot and by driving along the access road along the perimeter of the units. Inspection personnel will observe the current conditions and address any changes in the appearance of the cover system. Issues and concerns will be addressed either by RRW staff or inspection personnel. Provided below is a brief summary of inspection activities that will be conducted for the WCU and ECU, including detailed cover system integrity inspection procedures. The cover system visual inspections include the following twelve items:

1. Vegetative cover maintained (mowed) and free of bare spots

Inspection personnel will observe that the vegetative cover located on the WCU and ECU is maintained and free of bare spots. Inspection personnel will make these observations by traversing the cover system on foot and by driving along the access road. If the vegetative cover is not mowed to an acceptable length (less than 6") at the time of the inspection, it is noted on the Inspection Log and given to the RRW Representative. If an area of the cover system needs to be mowed, the task will be completed by a RRW Employee. If bare spots are noted during the inspection, top soil is placed in the area and vegetation established. Bare spots maybe addressed at the time of the inspection or prior to the next inspection by inspection personnel. The vegetative cover is routinely mowed and maintained by a RRW employee. All activities regarding the vegetative cover will be documented on the Inspection Log.

2. Cover free of undesirable plant species.

Inspection personnel will observe that the cover system is free of undesirable plant species by traversing the cover system on foot and by driving along designated access roads. Undesirable plants include noxious weeds and tree species. If undesirable plant species are observed during the site inspection, inspection personnel will spray the undesirable plant with an appropriate herbicide. All undesirable plants and removal of these plants will be documented on the Inspection Log. Weed growth is also maintained during routine mowing of the cover system by RRW personnel.

3. No evidence of burrowing animals.

The cover system will be observed each week for the presence of burrowing animals. Inspection personnel will make these observations by traversing the ECU and WCU on foot and by observations made from the access road. The presence of any burrowing animals within the cover system is unacceptable. Burrow holes will be addressed by utilizing the mud-packing method, which is an MDEQ approved method for rodent control. This method can be accomplished by placing one or two lengths of metal stove or vent pipe in a vertical position over the entrance of the den. The mud-packing mixture is then poured into the pipe until the burrow and pipe are filled with the earth-water mixture. The pipe is removed and dry earth is tamped into the entrance. The mud-pack is made by adding water to a 90 percent earth and 10 percent cement mixture until a slurry or thin cement consistency is attained. All entrances will be plugged with the well-compacted earth and vegetation re-established. Burrow holes will be addresses by inspection personnel during the inspection or prior to the next inspection.

4. No visible surface erosion, soft, wet or unstable areas noted on cover

Inspection personnel will observe the cover system for areas of erosion, soft, wet or unstable areas during each inspection. Inspection personnel will make these observations by traversing the ECU and WCU on foot and by observations made from the access road. Any areas of erosion, soft, wet or unstable areas within the cover system are unacceptable. Inspection personnel will document any areas of standing water on the Inspection Log and address the issues prior to the next inspection. Inspection personnel will address the area of concern by filling in any erosional features and establishing acceptable vegetation. When filling in the areas inspection personnel will maintain an acceptable drainage pattern to address and

prevent the formation of further erosion or soft, wet or unstable areas within the cover system. All activities regarding repairs will be documented on the Maintenance Log.

5. No evidence of standing surface water.

Inspection personnel will observe the cover system for areas of standing surface water during each inspection. Inspection personnel will make these observations by traversing the ECU and WCU on foot and by observations made from the access road. Standing surface water is unacceptable on the landfill cover system. If standing surface water is observed, the area will be filled and vegetation established in order to create an acceptable drainage pattern on the cover system. Inspection personnel will document any areas of standing water on the Inspection Log and address the issues prior to the next inspection.

6. No areas of settlement/subsidence noted.

Inspection personnel will observe the cover system for areas of settlement and subsidence. Inspection personnel will make these observations by traversing the ECU and WCU on foot and by observations made from the access road. Any area of subsidence or settlement located within the cover system is unacceptable. If these areas are observed, inspection personnel will address the areas by be filling the area with topsoil and will establish acceptable vegetation in order to prevent low-lying areas and maintain the drainage pattern of the cover system. Inspection personnel will document any areas of standing water on the Inspection Log and address the issues prior to the next inspection.

7. No cracks in cover soils.

Inspection personnel will observe the cover system for cracks in the cover soils. Inspection personnel will make these observations by traversing the ECU and WCU on foot and by observations made from the access road. Any area of cracks located within the cover system is unacceptable. If cracks are observed in the cover soils, inspection personnel will address the areas by be filling the cracks with topsoil and establishing vegetation. Inspection personnel will document any areas of cracking on the Inspection Log and address the issues prior to the next inspection.

8. Cover free of any other apparent problems which may lead to malfunction

Inspection personnel will observe the cover system for any other apparent problems which may lead to malfunction. Inspection personnel will make these observations by traversing the ECU and WCU on foot and by observations made from the access road. Any observation made by inspection personnel during the site inspections that may lead to malfunction will be documented on the Inspection Log and addressed by either inspection personnel or RRW employees in a time frame appropriate to the situation.

9. Gravel toe drain stable and free of clogging vegetation.

Observations will be made of the gravel toe drain during each of the site inspections. Observations will be made by inspecting the gravel toe drains on foot and by car

along the access road. Vegetation observed in the growing in the gravel toes drains will be removed by either spraying with an herbicide or by physically removing the plant. Inspection personnel will spray small areas of vegetation within the gravel to drain during the site inspection or prior to the next inspection. However, when larger growth areas are observed inspection personnel will inform a RRW representative who will obtain a commercial lawn service to spray the gravel toe drains with an herbicide. In addition, if trees or other large plants are observed, the RRW representative may appoint RRW employees to remove large trees or plants from the gravel toe drains. Inspection personnel will document all spraying and plant removal on the Maintenance Log.

10. Stormwater inlets/outlets are free of sediment and debris and are functional.

During the site inspection stormwater outlets are observed for the presence of sediment and debris which may block flow. Any sediment or debris that may potentially block flow is considered unacceptable and will be removed by inspection personnel during the inspection. Any sediment or debris removal will be documented on the Maintenance Log.

11. Access road intact and functional.

Observations will be made of the access road during each of the site inspections. Observations will be made by driving along the access road. The road will be observed for any holes, washout areas or any physical obstructions that would limit travel on the access road. Any factor that would limit the ability to travel the access road is unacceptable. Inspection personnel will document unacceptable areas of the access road areas on the Inspection Log and inform a RRW Representative. The access road will be repaired or in the process of repair prior to the next inspection. The access road is maintained and repaired by RRW personnel. All areas in need of repair will be documented on the Inspection Log and repaired areas will be documented on the Maintenance Log.

12. Asphalt pavement above cover intact and functional.

Observations will be made of the asphalt pavement cover during each of the site inspections to insure that it is intact and functional. Observations will be made on foot and by driving along the access road. Inspection personnel will document any areas in need of repair on the Inspection Log. Any repairs made to the asphalt pavement cover will be made by RRW personnel prior to the next inspection. All areas repaired will be documented on the Maintenance Log.

The leachate collection system was designed with pump system warning lights. On a weekly basis during the post-closure period, the warning lights on the leachate collection system manholes will be checked for indications of pump system failure. This will be recorded on the Inspection Log

On a monthly basis, leachate sediment within the manholes will be measured for indications of leachate volume and monitoring for storage capacity. In addition, the Sediment Containment Unit (SCU) leachate level will be measured and compared to the as-built elevations for indications of leachate accumulation within the SCU. Measurements will be recorded on the Inspection Log.

On an annual basis, the leachate collection and removal system (LCRS), specifically, the 6" perforated corrugated polyethylene (CPE) pipe will be completely inspected to ensure that the integrity and capacity of the systems are being maintained. The LCRS inspection is limited to those components of the system that can be observed without damage to the structure.

Benchmarks and final cover configuration surveys will be performed every five years.

Additional specific detailed information regarding inspection schedules is contained in the Post Closure Plan, which is included as an Attachment A11 of this application.

13. Inspections of emergency equipment

Inspection of containment unit emergency equipment is detailed in the Contingency Plan (Attachment A7 of this application).

A5.A.2 Frequency of Inspection

[R 299.9605 and 40 CFR §§264.15(b)(4), 264.174, 264.193, 264.195, 264.226, 264.254, 264.278, 264.303, 264.347, 264.602, 264.1033, 264.1052, 264.1053, 264.1058, and 264.1083 through 264.1089, where applicable]

The Post-Closure Plan identifies four types of inspections to be performed: weekly, monthly, semi-annual and annual. During weekly inspections, a general visual inspection of the units and selected leachate collection system components will be performed. The monthly and semi-annual inspections will include all items checked during the weekly inspections in addition to a detailed inspection of the post-closure groundwater monitoring system.

A5.B REMEDY SCHEDULE

[R 299.9605 and 40 CFR §264.15(c)]

The Post-Closure Plan (Attachment A11) includes procedures for rectifying system failures and correcting items that are damaged or nonfunctional that the inspections reveal. Maintenance Logs are attached.

A5.C INSPECTION LOG OR SUMMARY

[R 299.9605 and 40 CFR §264.15(d)]

The owner or operator must record inspections in an inspection log or summary. Copies of these records must be kept for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions taken. Inspection personnel will record all of findings on the attached Inspection Log. Each Inspection Log is given to a RRW representative for a signature. Maintenance logs will be created when maintenance is performed to mend failures, damaged and or nonfunctional items. The weekly, monthly, semi-annual, and annual inspection logs and maintenance logs will be maintained electronically after signature is received and can be available for EGLE review upon request.

Attachment A6

Preparedness/Prevention of Waiver

OTHER REQUIRED ATTACHMENTS
A6 – PREPAREDNESS & PREVENTION
(revised 12/20/2018)

PREPAREDNESS & PREVENTION

Justification for Each Element of the Subpart C Preparedness and Prevention Requirements

Design and Operation of Facility

Design and Operation of the facility has been planned to minimize the possibility of a fire and explosion, or unplanned sudden or non-sudden release of hazardous waste constituents to groundwater, air, soil, or surface water. Final As-Built engineering plans with design specifications for for the Eastern Containment Unit (ECU) and the Western Containment Unit (WCU) for the Ford River Raisin Warehouse are contained in the *Waste Disposal Surface Impoundment As-Built Drawings* (drawings 1 through 65) included in the *Closure Certification Report*, dated October 1999. *The Closure Certification Report* also includes the basis of design for the components of the ECU and WCU. Both containment units are maintained and monitored. The inspection schedule can be viewed in Attachment A5 (Inspection Schedule) and in the Post Closure Plan (Attachment A11).

Required Equipment

The waste located within the landfills is not flammable. Therefore, water at adequate volumes, automatic sprinklers, portable fire extinguishers and other fire control equipment are not necessary at the landfills. However, the main plant and the associated support buildings (including the WWTP) can be considered at risk for fires. Therefore, the River Raisin Warehouse has made arrangements with the City of Monroe Police Department and the City of Monroe Fire Chief should such an emergency occur.

An internal communications system consisting of lights on a panel at each Leachate Manhole (LMH) promptly alarms personnel of the landfill's leachate system status. The personnel on Site have a cellular phone capable of summoning private and State emergency response resources, as well as maintenance personnel if needed.

Testing and Maintenance of Equipment

The internal communications system is monitored on a weekly basis. The inspection schedule can be viewed in Attachment A5 and Attachment A11.

Access to Communications or Alarm System

All personnel on Site have a cellular phone capable of summoning private and State emergency response resources, as well as maintenance personnel if needed.

Required Aisle Space

Since the WCU and ECU are landfills with no buildings, aisle space is not applicable.

Arrangements with Local Authorities

The River Raisin Warehouse has made arrangements with the City of Monroe Police Department and the City of Monroe Fire Chief to act as the Hazardous Waste Coordinator or Incident Commander in the case of a hazardous waste incident. The following services provided by the City of Monroe Police and Fire are as follows:

OTHER REQUIRED ATTACHMENTS
A6 – PREPAREDNESS & PREVENTION
(revised 12/20/2018)

- Immediate response
- Crowd control assistance
- Temporary security to affected areas
- Public safety escorts
- First responder limited rescue operations
- Evacuation of surrounding areas if required

The River Raisin Warehouse has also made arrangements with Mercy Memorial Hospital to make the hospital aware of the type of hazardous wastes stored at the Plant and the possible illnesses and injuries with such materials.

The plant has made Michigan Department of Environmental Quality (MDEQ) aware of the type of hazardous waste and requested assistance for potential hazardous waste emergencies.

Unloading Hazards

The WCU and ECU are closed and do not accept any waste. There are no unloading operations.

Prevention of Runoff and Flooding

Both the WCU and ECU were designed and built to prevent flooding and prevent runoff coming into contact with waste. Final As-Built engineering plans with design specifications for for the Eastern Containment Unit (ECU) and the Western Containment Unit (WCU) for the Ford River Raisin Warehouse are contained in the *Waste Disposal Surface Impoundment As-Built Drawings* (drawings 1 through 65) included in the *Closure Certification Report*, dated October 1999.

Measures to Mitigate Effects of Equipment and Power Outages

Ford and MSG maintain contracts with independent contractors to maintain system equipment such as leachate pumping system components and control panels. These contractors are on-call and can be summoned when necessary.

Measures to Prevent Undue Exposure of Personnel to Hazardous Waste

In addition to providing information on the nature of the stored hazardous waste at the facility, all personnel potentially exposed to hazardous waste must wear proper Personal Protective Equipment (PPE) such as protective gloves and safety glasses.

Attachment A8

Traffic Information

**OTHER REQUIRED ATTACHMENTS
A8 – TRAFFIC INFORMATION**

TRAFFIC INFORMATION

Traffic at the facility is restricted to authorized personnel only. Traffic on the closed ECU and WCU is limited to authorized maintenance vehicles only.

See Other Required Attachments (A4) for traffic provisions and restrictions.

Attachment A9

Location Information

OTHER REQUIRED ATTACHMENTS
A9 – LOCATION INFORMATION
(revised 12/20/2018)

LOCATION INFORMATION

See Attachments (II, III and IV) for site location and facility details.

Seismic Standard Considerations

According to 40 CFR 270.14 (b) (ii), if the facility is proposed to be located in an area listed in Appendix VI of part 264, the owner or operator shall demonstrate compliance with the seismic standard § 264.18(a).

The Ford River Raisin Warehouse, located in Monroe, Michigan, is not listed in Appendix VI of part 264. Therefore, since the site location is not listed in appendix VI of part 264, no further information is required to demonstrate compliance with § 264.18(a).

100-Year Floodplain Considerations

According to the attached National Flood Hazard Layer FIRMette drawing, the Eastern Containment Unit, the Western Containment Unit, and the on-site WWTP are located within an *Area of Minimal Flood Hazard* (Zone X).

National Flood Hazard Layer FIRMette



41°54'22.72"N



USGS The National Map: Orthoimagery. Data refreshed October, 2017.

83°20'44.66"W

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS

- Without Base Flood Elevation (BFE)
Zone A, V, A99
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD

- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS

- Area of Minimal Flood Hazard *Zone X*
- Effective LOMMR
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES

- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES

- Cross Sections with 1% Annual Chance Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS

- Digital Data Available
- No Digital Data Available
- Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 12/18/2018 at 7:54:12 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Attachment A10

Personnel Training Program

FORM EQP 5111 ATTACHMENT TEMPLATE A10 PERSONNEL TRAINING

This document is an attachment to the Michigan Department of Environmental Quality's *Instructions for Completing Form EQP 5111, Operating License Application Form for Hazardous Waste Treatment, Storage, and Disposal Facilities*. See Form EQP 5111 for details on how to use this attachment.

The administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), R 299.9501, R 299.9605 and Title 40 Code of Federal Regulations (CFR) §§264.16 and 270.14(b)(12), establish requirements for personnel training programs at hazardous waste management facilities. All references to 40 CFR citations specified herein are adopted by reference in R 299.11003.

This license application template addresses requirements for a personnel training program at the hazardous waste management facility for the River Raisin Warehouse in Monroe, Michigan. The information included in the template demonstrates how the facility meets the personnel training requirements for hazardous waste management facilities.

This template is organized as follows:

- A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION PROGRAMS
 - A10.A.1 Outline for Introductory Training Program
 - A10.A.2 Outline for Continuing Education
- A10.B PERSONNEL SUBJECT TO TRAINING REQUIREMENTS
 - A10.B.1 Job Titles and Job Descriptions
 - A10.B.2 Description of How Training is Designed to Meet Actual Job Tasks
- A10.C FREQUENCY OF REQUIRED TRAINING
 - A10.C.1 Initial Training
 - A10.C.2 Continuing Education
- A10.D TRAINING DIRECTOR
- A10.E DOCUMENTATION AND RECORD KEEPING
 - A10.E.1 Documentation
 - A10.E.1(a) Job Titles
 - A10.E.1(b) Written Job Descriptions
 - A10.E.1(c) Written Description of Type and Amount of Training Given to Each Position
 - A10.E.1(d) Documentation That Training Has Been Given to and Completed by Facility Personnel
 - A10.E.2 Record Keeping

A10.A CONTENT OF INTRODUCTORY AND CONTINUING EDUCATION TRAINING PROGRAMS
[R 299.9605 and 40 CFR §264.16(a)]

Personnel associated with Post-Closure tasks will successfully complete a training program consisting of site-specific document review and on-the-job training for all personnel involved with containment unit inspections and environmental monitoring activities at the Ford River Raisin Warehouse (RRW). All personnel are trained on site under the direct supervision of senior staff members familiar with current status of on-site hazards, and the post-closure care activities are

directed by a State of Michigan Registered Professional Engineer and a Certified Hazardous Materials Manager.

A10.A.1 Outline for Introductory Training Program

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

Prior to conducting any on-site activities, personnel associated with Post-Closure tasks will receive site specific introductory training and specialized certified training. The training consists of the following topics:

- HAZWOPER
- Review of background information of site environmental conditions and general construction and configuration of containment units
- Review of Health and Safety Plan (HASP)
- Job Specific Training

A10.A.2 Outline for Continuing Education

[R 299.9605 and 40 CFR §§264.16(a)(1) and 264.16(d)(3)]

Continuing education is implemented as needed. The training director administers the continuing education requirements. Annual HAZWOPER refresher trainings along with job specific trainings will be conducted pursuant to each job description.

A10.B PERSONNEL SUBJECT TO TRAINING REQUIREMENTS

[R 299.9605 and 40 CFR §§264.16(a),(d)]

A10.B.1 Job Titles and Job Descriptions

[R 299.9605 and 40 CFR §§264.16(d)(1),(2)]

Environmental Scientist and or Technicians will be conducting tasks associate with Post-Closure activities. Below are the general job descriptions for each.

Environmental Scientist Job Description

General Characteristics:

- Applies standard techniques, procedures and criteria to perform assigned tasks as part of a broader assignment.
- Exercises judgment on details of work and in application of standard methods for conventional work.

Technical Responsibilities:

- Collects data, gathers information or documents and prepares simple reports required for project permits.
- Performs standard computations or analysis.
- Prepares drawings and visual aids.
- Performs a variety of routine tasks, which provide experience and familiarity with methods, practices

Direction Received:

- Receives close supervision on unusual or difficult problems, and general review of all aspects of work.

Communication Skills:

- Possesses basic oral and written communication skills.
- Interacts with other staff.

Technician Job Description

General Characteristics:

- Applies standard techniques, procedures and criteria to perform assigned tasks as part of a broader assignment.
- Exercises judgment on details of work and in application of standard methods for conventional work.

Technical Responsibilities:

- Coordinates, produces, completes and analyzes sketches, layouts, graphs, charts and drawings required for specific projects and reports.
- Understands the CADD system, procedures and coordinates layout details and dimensions (as applicable).
- Performs non-routine and complex assignments involving responsibility for planning and conducting a complete project of relatively limited scope or a portion of a large and more diverse project; may include budget management.
- Performs quality assurance checks.
- Manages material and field equipment.
- Performs routine tasks, which provide experience and familiarity with the technical staff, methods and practices.

Direction Received:

- Independently maintains accuracy, quality, and completeness and schedule adherence.

Communication Skills:

- Possesses basic oral and written communication skills.

A10.B.2 Description of How Training is Designed to Meet Actual Job Tasks

[R 299.9605 and 40 CFR §§264.16(a)(1) and (d)(3)]

The senior staff members assigned to instruct proposed inspection personnel familiarize the personnel with the site, introduce them to the RRW staff and safety procedures, and provide the personnel with a line-by-line presentation of the inspection components contained within the inspection logs. These items include inspection components of the containment unit cover, the leachate collection systems components, and monitoring wells and piezometers. Personnel are instructed to follow up on maintenance issues that are the responsibility of the RRW, and to conduct other maintenance activities such as erosion control, well maintenance, access road maintenance, the clearing of unwanted vegetation, and to mitigate damage created by burrowing animals. Personnel are instructed on the completion of the weekly, monthly, semi-annual, and annual inspection logs, and the completion of maintenance logs for any maintenance activity conducted at the RRW.

A10.C FREQUENCY OF REQUIRED TRAINING

[R 299.9605 and 40 CFR §§264.16(b), (c)]

A10.C.1 Initial Training

[R 299.9605 and 40 CFR §264.16(b)]

Each employee completes the site specific training within six months of their assignment to the facility. Employees undergoing initial training are not allowed to work in unsupervised positions until the required training is completed.

A10.C.2 Continuing Education

[R 299.9605 and 40 CFR §264.16(c)]

Annual HAZWOPER refresher trainings will be conducted. Other job specific trainings will be conducted pursuant to each job description on an as need basis.

A10.D TRAINING DIRECTOR

[R 299.9605 and 40 CFR §264.16(a)(2)]

All personnel are trained on site and off site under the direct supervision of senior staff members familiar with current status of on-site hazards. The post-closure care activities are directed by a State of Michigan Registered Professional Engineer and a Certified Hazardous Materials Manager.

A10.E DOCUMENTATION AND RECORD KEEPING REQUIREMENTS

[R 299.9605 and 40 CFR §§264.16(d) and (e)]

A10.E.1 Documentation

[R 299.9605 and 40 CFR §264.16(d)]

A10.E.1(a) Job Titles and Names of Employees Filling Each Job

[R 299.9605 and 40 CFR §264.16(d)(1)]

Job titles and employee names conducting post-closure activities are maintained at the facility in paper form. This form may be updated regularly as needed.

A10.E.1(b) Written Job Descriptions

[R 299.9605 and 40 CFR §264.16(d)(2)]

Written job descriptions for the jobs titles listed above are maintained at the facility in paper form. Job descriptions may be updated regularly as needed.

A10.E.1(c) Written Description of Type and Amount of Training Given to Each Position

[R 299.9605 and 40 CFR §264.16(d)(3)]

Written description of the type and amount of the training given to each employee is maintained at the facility. Written description of the type and amount of the trainings may be updated as needed.

A10.E.1(d) Documentation That Training Has Been Given to and Completed by Facility Personnel

[R 299.9605 and 40 CFR §264.16(d)(4)]

Documentation that training has been given to and completed by each employee is maintained at the facility.

A10.E.2 Record Keeping
[R 299.9605 and 40 CFR §264.16(e)]

Training records for current employees will be kept at the facility and will be updated as needed.