

FACT SHEET

Proposed Renewal of a Hazardous Waste Management Facility
Postclosure Operating License

for

Ford Motor Company, River Raisin Warehouse
Hazardous Waste Landfill Facility
3200 East Elm Avenue
Monroe, Michigan 48161

MID 005 057 005

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

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I. EXECUTIVE SUMMARY

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Materials Management Division (MMD) proposes to renew the Hazardous Waste Management Facility Postclosure Operating License (License) to Ford Motor Company (Ford) for the postclosure monitoring and maintenance of the closed hazardous waste landfill cells at the Ford River Raisin Warehouse (Facility) located at 3200 East Elm Avenue in Monroe, Michigan. Section II of this Fact Sheet describes the state program established to regulate hazardous waste management.

The provisions of Rule (R) 299.9502 and R 299.9518 of the administrative rules promulgated pursuant to Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Part 111), control the issuance of a License to a hazardous waste landfill disposal facility. Based on the review of the Ford's License renewal application and site inspections, EGLE staff has proposed that the License be reissued based on the following conclusions:

- A. The Facility will be maintained in accordance with approved plans and applicable rules. Section III of this Fact Sheet describes the facility site, design, and prior licensing. Section IV of this Fact Sheet describes the environmental impact and ongoing environmental monitoring at the facility.
- B. The application submitted by Ford is sufficiently detailed to demonstrate that the Facility's postclosure care and monitoring complies with the applicable technical standards. In addition to the standard and general facility operating conditions contained in all operating license, the draft License contains conditions specific to Ford's landfill postclosure maintenance and monitoring activities. A summary and an explanation of these conditions are included in Section III of this Fact Sheet. The portions of the renewal application that describe in detail how Ford will comply with certain regulations have been attached to the draft License as enforceable documents. Such attachments include, but are not limited to, the Inspection Schedule, Contingency Plan, Postclosure Plan, and the Postclosure Groundwater Sampling and Analysis Plan.
- C. The reissuance of the License will minimize the potential for this facility to present a hazard to human health or the environment during postclosure care.

Ford has been found to be out of compliance with certain provisions of Part 111 during its operating life; however, they have generally been responsive in correcting the violations that have been cited.

Although EGLE believes it has done a thorough job in reviewing the License renewal application, the agency seeks public input on the proposed issuance of the License. Section V of this Fact Sheet describes the public participation process.

II. INTRODUCTION

Part 111, and its administrative rules (Part 111 rules), regulates the management of hazardous waste from generation to disposal. Likewise, the federal Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984 (HSWA), regulates hazardous waste management nationwide.

Both Part 111 and the RCRA establish a permit system governing the treatment, storage, and disposal of hazardous wastes. RCRA allows states to obtain authorization to issue a state hazardous waste operating license in lieu of a federal permit. Effective August 3, 2020, the state of Michigan amended the administrative rules promulgated pursuant to Part 111 to be equivalent to those under RCRA and applied to the United States Environmental Protection Agency for authorization to administer all portions of the RCRA Program, except for some of those under HSWA.

The duration of the License will be 10 years.

III. FACILITY DESCRIPTION

A. Facility Description

The Facility is located at 3200 East Elm Avenue in Monroe, Michigan and is bordered by the River Raisin to the south and Sterling State Park to the north. The Facility historically was an automotive parts manufacturing facility that has two hazardous waste landfill cells (approximately 54 acres) that were created to address historic hazardous waste disposal areas with soil and groundwater impacts. Ford completed treatment of the hazardous waste and closure of the landfill containment areas in 1999. The closure was certified, and Ford has been conducting postclosure care and monitoring of these cells since then.

B. Facility Design and Regulatory Status

The closed hazardous waste landfill cells are currently being monitored and maintained under a License issued pursuant to Part 111. The current License expired on November 28, 2017, and Ford submitted a PC operating license renewal application in May 2017, with revisions submitted on October 29, 2021, and July 29, 2022.

The cells consist of low permeability cutoff walls extending into the natural clays beneath the site, interior leachate collection systems, and a cover system consisting of clay, plastic liner, and grass. The hazardous waste inside the cells was stabilized using lime kiln dust, fly ash, and cement. The combination of leachate collection systems and the artesian groundwater conditions in the area create an inward and upward hydraulic gradient at the

cells.

C. Facility Specific License Conditions

The following items are facility-specific license conditions for the PC care of the landfill:

1. Conditions for postclosure. Conditions II. C. and II.J. require Ford to inspect the hazardous waste management facility and remedy any deterioration or malfunction of structures or equipment. Condition III.B. requires the Facility to maintain run-on, runoff, and contaminant controls, including the leachate collection and removal system. Condition III.C. requires the facility to submit an annual report summarizing all of the maintenance activities necessary to properly maintain the facility during the previous year to the MMD.
2. Environmental Monitoring Conditions. Conditions IV.A., IV.B., and IV.C. require Ford to conduct a groundwater monitoring program, a leachate monitoring program, and an effluent monitoring program.

In addition, Part V of the draft License identifies existing waste management units (WMUs) at the Facility. Ford has conducted investigative and remedial activities to address some of the WMUs. Part V of the license requires Ford to continue these activities until all of the WMUs and releases of contaminants have been addressed. Part V also requires Ford to notify EGLE if a new release of contaminants has occurred. If such a release is identified from any of the WMUs, Ford is required to prepare and implement plans for the remediation of the contamination.

IV. ENVIRONMENTAL IMPACT

A. Wastes Contained in Landfill Cells

The waste in the landfill containment cells is stabilized hazardous waste sludges from historic surface impoundment wastewater treatment operations that contain various metals (lead, cadmium, chromium, etc.).

B. Groundwater Monitoring

Ford conducts a groundwater monitoring program to evaluate whether any hazardous constituents from the closed hazardous waste landfill cells have entered the groundwater adjacent to the landfill area. The results of the monitoring to date have shown that the cells have not impacted the groundwater. Ford also monitors the static and artesian (upward gradient) groundwater conditions at the site to ensure that an inward and upward gradient to cells is maintained.

C. Leachate and Effluent Monitoring

Ford conducts a leachate quality and leachate level monitoring program to evaluate what hazardous constituents from the leachate should be included in the groundwater monitoring program and to document the inward and upward gradient for the landfill containment cells.

V. PUBLIC PARTICIPATION

A. Public Comment Procedures

The purpose of public participation is to ensure that the interested public has knowledge of EGLE's proposed actions and the opportunity to comment on those actions. In addition, the process ensures EGLE has an opportunity to benefit from information the public might have relevant to their proposed actions. Comments regarding the draft License or the Facility may be submitted in writing to Christine Matlock, Senior Environmental Engineer, Engineering and Program Support Unit, Hazardous Waste Section, MMD, at the address or email listed in Subsection C, below, by September 28, 2022. To request a formal public hearing, please submit a written request to Christine Matlock by September 28, 2022.

After the close of the public comment period, EGLE will decide whether to issue the final License. Comments submitted during the public comment period will be considered by EGLE, to formulate a final decision on the license. Responses to written comments will be included in the record supporting EGLE's final decision. The final decision will be communicated to the applicant, each person who provided comment during the public comment period, and all persons on the Facility mailing list.

B. Locations of Available Information

The draft License is available to review online at Michigan.gov/FordRiverRaisinWarehouse or can reviewed in person (by appointment) at the following locations:

- EGLE, MMD, Constitution Hall, 525 W. Allegan Street, Lansing, Michigan; contact Vickie Terry at 517-284-6546; or TerryV2@Michigan.gov.
- EGLE, MMD, Jackson District Office, 301 East Louis Glick Highway, Jackson, Michigan; contact Stevie White at 517-581-0033; or WhiteS6@Michigan.gov.
- Dorsch Memorial Library, 18 East First Street, Monroe, Michigan; contact 734-241-7878.

C. Contact Person

Comments regarding the draft License should be addressed to Christine Matlock, at MatlockC2@Michigan.gov; 517-290-4612; or EGLE, MMD, P.O. Box 30241, Lansing, Michigan 48909.

Written comments concerning the draft License should include the name and address of the writer, a concise statement of the basis for the comments, and the supporting relevant facts upon which the comments are based. All further requests for information, including requests for copies of the draft License and the Fact Sheet should be made to Christine Matlock at MatlockC2@michigan.gov; 517-290-4612; or EGLE, MMD, P.O. Box 30241, Lansing, Michigan 48909.