



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

September 9, 2009

**RE: FORD MOTOR COMPANY
OHD 000 817 270
SQG RTC**

John Sherman
Ford Motor Company
18300 Snow Road
Cleveland, OH 44142-1415

Dear Mr. Sherman:

I received your July 1, 2009 letter regarding my May 29, 2009 inspection of Ford Motor Company located at 5600 Henry Ford Blvd., Brook Park, Ohio. Your letter addressed my concern and request for more information regarding the wastewater sluiceway system. The Ohio EPA disagrees with your assessment of this system. Specifically, each waste that enters this wastewater sluiceway system must be evaluated to determine whether it is a hazardous waste at its point of generation (i.e. before it enters the system). Ford should be complete and accurate in these evaluations in order to avoid a hazardous waste entering one of the two mill ponds and therefore causing it to become a regulated hazardous waste surface impoundment. In addition, used oil is prohibited from entering surface impoundments as per Ohio Administrative Code 3745-279-12(A). Your letter is correct in that the sludge removed from the mill ponds also needs to be evaluated to determine whether it is a hazardous waste.

I reviewed our file on this facility and found that these issues were dealt with by Ford and the Ohio EPA in 1990. This included Ohio EPA sampling some of the wastes that enter the sluiceway system. Non-hazardous results were found.

I have no evidence that Ford has incorrectly determined that the wastes entering this system are non-hazardous. These evaluations may be part of a future inspection of Ford and records (test results, process descriptions, MSDS, etc.) should be kept for possible review. No further information is being required from Ford at this time.

You can find copies of the regulations and other information on the Division of Hazardous Waste Management web page at <http://epa.ohio.gov/dhwm>.

John Sherman
Ford Motor Company
September 9, 2009
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If you have any questions, please contact me at (330) 963-1217, or robert.almquist@epa.state.oh.us.

Sincerely,


Robert Almquist
Division of Hazardous Waste Management

RA:cl

ec: Lynn Beamer, Ford Motor Company
Frank Popotnik, DHWM, NEDO
Ed D'Amato, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO
Dan Lyons, MPS Group
Mike Stevens, DSW, NEDO
Jennifer Kurko, DSIWM, NEDO

cc: Marlene Kinney, DHWM, NEDO

Notice:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your facility from its obligation to comply with all applicable regulations.