POLLUTANT SPILL PREVENTION

OHIO TRUCK PLANT

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SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

Ohio Truck Plant
Ford Motor Company
Miller at Walker Roads
Avon Lake, Ohio 44012

* * *

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SECTION I: Plant Operation

A. Material Storage

There are four (4) types of potential polluting materials used at the Ohio Truck Plant. These materials are stored as indicated below. Attached is a sketch showing the location of each material stored on Plant grounds.

1. Gasoline

   a. Two (2) 10,000 gallon above-ground storage tanks

2. Primer Paint, E-Coat

   a. Four (4) 30,000 gallon underground storage tanks (temp. storage)
   b. One (1) 120,000 gallon above-ground process tank

3. Fuel Oil, #6 Grade

   a. Two (2) 85,000 gallon above-ground storage tanks

4. Sulfuric Acid

   a. One (1) 1,000 above-ground storage tank
   b. One (1) 6,000 above-ground storage tank

5. Caustic Soda

   a. One (1) 10,000 gallon above-ground storage tank
   b. [illegible],000 gallon above-ground storage tank

[illegible]

[illegible] 10,000 gallon above-ground storage tank

[illegible]

[illegible] gallon underground storage tank
[illegible] 10,000 gallon above-ground separator-[illegible] tank

[illegible]

[illegible] pile inside storage trailer

[illegible]ment Batch Tank

[illegible],000 gallon tanks
[illegible],000 gallon tanks

[illegible] tank, one (1) 30,000 gallon below-ground [illegible]
[illegible] gallon above-ground tanks

SECTION I: Plant Operation (Cont'd)

*11. Waste Paint and Solvent

a. Two (2) 10,000 gallon below-ground tanks

*12. Sno-Sol Solvent

a. One (1) 20,000 gallon below-ground tank

*13. Paint Thinner

a. One (1) 20,000 gallon below-ground tank
b. Two (2) 5,000 gallon below-ground tanks

*14. E-Coat Resin

a. One (1) 20,000 gallon below-ground tank

15. Drum Stock, Paint and Paint Thinner stored in the Paint and Oil House

*Note: Although included in the materials storage inventory, non-oil/non petroleum based materials are marked with an asterisk (*) - they are not subject to Federal Oil Pollution Prevention Regulations, ADCFR112.

SECTION I: Plant Operation (Cont'd)

b. Transportation

Materials are transported to the Plant by the following method:

Bulk tanker trucks that pump their contents into storage tanks.

Truck driver attends filling operation.

Salt is delivered by covered dump trucks.

Drum stock is delivered by truck and transported within the plant to the Paint and Oil House.

Consumption

Item numbers refer to the previous page.
These materials are delivered to the manufacturing processes by the following means:

#1
Gasoline from two (2) 10,000 gallon above-ground storage tanks are used as needed. The tank fill lines are above ground and the exit lines are below ground.

#2
Primer is mixed in the paint kitchen and delivered to the 120,000 Gallon process dip tank through overhead piping. The primer is pumped into the three (3) underground storage tanks through overhead piping for temporary storage from the 120,000 gallon process dip tank.

#3
Fuel oils are piped to the Power House. The feed lines are underground and are kept warm with steam.

#4, 5, 6
Chemicals are piped to either the waste Water Treatment System or to Deionized Water Resin Systems. The feed lines are above ground.

[illegible]
Waste oil is stored in a 10,000 gallon oil separator. storage tank until [illegible] private oil reclaimer. The tank is located inside the Main Assembly Building at BB-21.

[illegible] only in the winter and is spread [illegible]

[illegible] tanks are used to batch treat the industrial waste [illegible] the Avon Lake City sewerage system

[illegible] delivered. Used to fuel tractor van [illegible]

[illegible] are collected from the [illegible] until picked up by a solvent [illegible]

[illegible] truck delivered, used to clean white metal [illegible]

[illegible] delivered, used to cut paint at the [illegible]

[illegible] delivered, Mixed in the paint kitchen and [illegible] process tank.

[illegible] and Thinner, delivered by truck and introduced to the process [illegible] paint kitchen.

SECTION II: Analysis of Pollution Incidents

A. History of Pollution Incidents

1. April 2[illegible], 1979 - Minor oil spill - Shell Iris seeped from a damaged drum. Incident resolved. (See Pollution Incident Report, Section VII - Attached)

2. July 13, 1979 - Minor resin spill - Storage tank overflowed while being filled. Incident resolved. (See Pollution Incident Report, Section VII - Attached)

3. August [illegible], 1979 - Minor petroleum naptha spill - due to a damaged drum and a damaged downcommer. Incident resolved. (See Pollution Incident Report, Section VII - Attached)

B. Pollution Incident Potential

1. Utility Failure

All operating and material handling and storage equipment is completely fail-safe in its design. There are no electrically operated valves or closure devices which might fail should an electrical power interruption occur.

2. Bulk Storage

All [illegible] ground tanks are diked.
[illegible] areas are provided with proper identification.

[illegible] Security Office is manned [illegible] security officers are on duty at all times and patrol [illegible] regular basis. Each carries a two way radio [illegible] Security Office. A six foot chain link fence, topped with [illegible] of barbed wire, completely encircles the plant property [illegible] must pass through a guard post [illegible] before being granted admittance to the Plant property.

[illegible] were made on plant ground [illegible] of plant property. [illegible] been a problem at the [illegible] .

SECTION III: Emergency Call List

A. Ford Personnel

Ford Personnel are instructed to immediately contact the Plant Security Office to report all spill incidents. Plant Security maintains an up-to-date emergency call list and is able to track down an employe at home or elsewhere. The Office is manned (24) hours per day, (365) days per year.

A Plant Environmental Representative has been assigned overall responsibility in co-ordinating responses to pollution incidents. He is the person who Plant Security has instructions to contact immediately in the event of a spill, and he in turn instructs Plant Security Officers to make contact with others listed on the emergency call list. The list is as follows:

1. Plant Security Office
   Ohio Truck Plant
   Ford Motor Company
   Miller at Walker Road
   Avon Lake, Ohio 44012
   (216) 933-4380

2. Jim Davis, Environmental Specialist
   Designated Plant Environmental Representative & Emergency Coordinator
   Plant Engineering Department
   (216) 282-6121, Ext. 287 (Home Phone [redacted]

3. R. W. Eichholz, Manager
   Manufacturing Engineering Department
   (216) 282-6121 Ext. 247
   Home: [redacted]

4. [illegible] J. Liberati
   [illegible] Manager
   [illegible] 282-6121 Ext. 234
   [illegible] (216) [illegible]

[illegible] responsibility of the Plant Environmental [illegible] Company Supervisory Personnel in the event [illegible] accidental dis- [illegible] (See Discharge Contingency [illegible]

[illegible] Environmental Representative is further [illegible] Environmental Representative, A. M. Twilley, [illegible] 323-2345, who in turn reports to [illegible] Office (A. B. M. Houston, Manager, Compliance and [illegible] Engineering Office (F. J. Kallin, [illegible] back-up is available from the [illegible] assistance on an as-needed [illegible]

[illegible]

[illegible] Environmental Representative maintains the following list of Govern- [illegible] be notified as appropriate, should a spill incident occur:

"Spill incident" is defined as the discharge of oil or hazardous substances [illegible] navigable waters of the United States [illegible] standards or causing a film or sheen or discoloration [illegible] surface of the water or adjoining shorelines).

1. U. S. Coast Guard National Response Center
   Washington D.C.
   24-Hour Toll Free Reporting 1-(800) 424-8802
   If unable to dial on 800 toll free number,
   call (202) 426-2679

2. Ohio Environmental Protection Agency
   Emergency Response
   Spill Alert, Columbus, Ohio
   If calling from Ohio 1-(800) 282-9378
   If calling from any other state (614) 224-0946

In the event of a spill incident posing a serious hazard to property or public health or safety, the following agencies are also to be notified:

3. Avon Lake Spill Alert
   (216) 933-3185

4. Avon Lake Police Department
   (216) 933-4567

5. Avon Lake Fire Department
   (216) 933-6129

6. Lorain Health Department
   (216) 244-3418

SECTION IV: Discharge Contingency Plan

A. Supervisory Personnel

Environmental Services Section of Plant Engineering Department maintains the following list of available Supervisory Personnel and their office and home telephone numbers, who would be called upon to oversee any cleanup required after a spill incident:

		OFFICE	HOME
1.	Jim Davis	(216) 282-6121, Ext. 287	non-responsive [redacted]
2.	R. W. Eichholz	(216) 282-6121, Ext. 247 248	
3.	T. J. Liberati	(216) 282-6121, Ext. 234	

B. Outside Contractors

In addition, Ford maintains a yearly Company-wide order with the following outside contractor to aid in spill clean-up operations as required:

Marine Pollution Control Corporation
David Usher, Owner
[illegible] W. Jefferson
Detroit, Michigan 48217
Office (313) 849-2333
If no answer non-responsive

The Plant also maintains a blanket order with the following local contractor to assist in liquid industrial waste removal:

Browning-Ferris Industries
[illegible] Cogswell Road P. O. Box [illegible]
[illegible] Michigan 48184
[illegible]9-8200

[illegible]

[illegible] maintains an Emergency Spill Containment [illegible] event of a spill incident. The Emergency Spill Containment [illegible] inside the main entrance to the [illegible] and [illegible] following equipment:

- [illegible] mats used for blocking storm water [illegible]
- [illegible] construction of dams and barriers
- [illegible] used to skim oil from the [illegible]
- [illegible]-inch plastic pipe for [illegible]
- [illegible] stakes for construction [illegible]
- [illegible] pump for pumping contaminated materials
- [illegible] of 3/4" plywood for construction of barriers and dams
- [illegible] for construction of dams, material removal, [illegible]

[illegible] Emergency Spill Containment Kit, Plant Services [illegible] backup. This equipment is located throughout the [illegible] pumps, portable tanks, shovels, [illegible]

SECTION V: Plant Inspection

A. Routine Inspection

Weekly routine inspections are made of Plant facilities which could conceivably contribute to a pollution incident, including an inventory of all potential pollutants. The Plant Environmental Representative is responsible for such inspections, which he coordinates with other Plant Engineers and Safety Representatives. He particularly seeks out potential weaknesses before an incident of failure can occur. Attached is a copy of the inspection check list.

B. Scheduled Audits

Audits of plant operations are conducted periodically by Stationary Source Environmental Control Office (SSECO), Ford Motor Company. The facility is inspected for compliance with environmental regulations and changes in preventative measures and maintenance procedures are recommended.

C. Government Agencies

Ohio Truck Plant Personnel have been instructed to admit properly identified Government Officials, or their duly authorized Representatives, when visiting the Plant and to comply fully with official requests concerning such visits. A copy of the plan is maintained by the Plant Management and is available for on-site review by representatives of the U. S. Environmental Protection Agency by official request, during normal working hours.

SECTION VI: Personnel Training

A. Spill Prevention Briefings

Plant Engineering and production personnel are periodically instructed as to spill prevention control and countermeasure procedures as regular plant safety briefings are conducted. Staionary Source Environmental Control Office and Management and Technical Training Department, General Services, has developed a Pollutant Spill Prevention Program consisting of two video-tape instruction and training sessions and accompanying supplemental written materials. The program is periodically presented to appropriate plant supervisory and hourly employes at this and other Ford Motor Company facilities on a circulating basis. Evaluation and Standards Department, Plant Engineering Office, also occasionally publishes a "Maintenance Bulletin for plant engineers regarding general preventive maintenance techniques such as the maintenance of pollution control equipment and wastewater treatment systems.

B. Dissemination of Information

Stationary Source Environmental Control Office also periodically distributes to affected Company divisions and plants information concerning Federal, state, and local regulations, spill events, and recently developed precautionary measures.

Training sessions were held for key personnel on October 1976, October 1977, [illegible] 1978, May 1979, May 1980 and April 1981. Lecture and visual aids were used.

November, 19[illegible]

PROCEDURE
[illegible] TRUCK PLANT
[illegible] PERSONNEL NOTIFICATION CHART

[illegible] Air [illegible] ical Spill situation during the hours when most supervisory [illegible] ing groups in this order:

[illegible] Personnel
[illegible]

[illegible] Maintenance
[illegible]88,289

(MUST BE NOTIFIED)

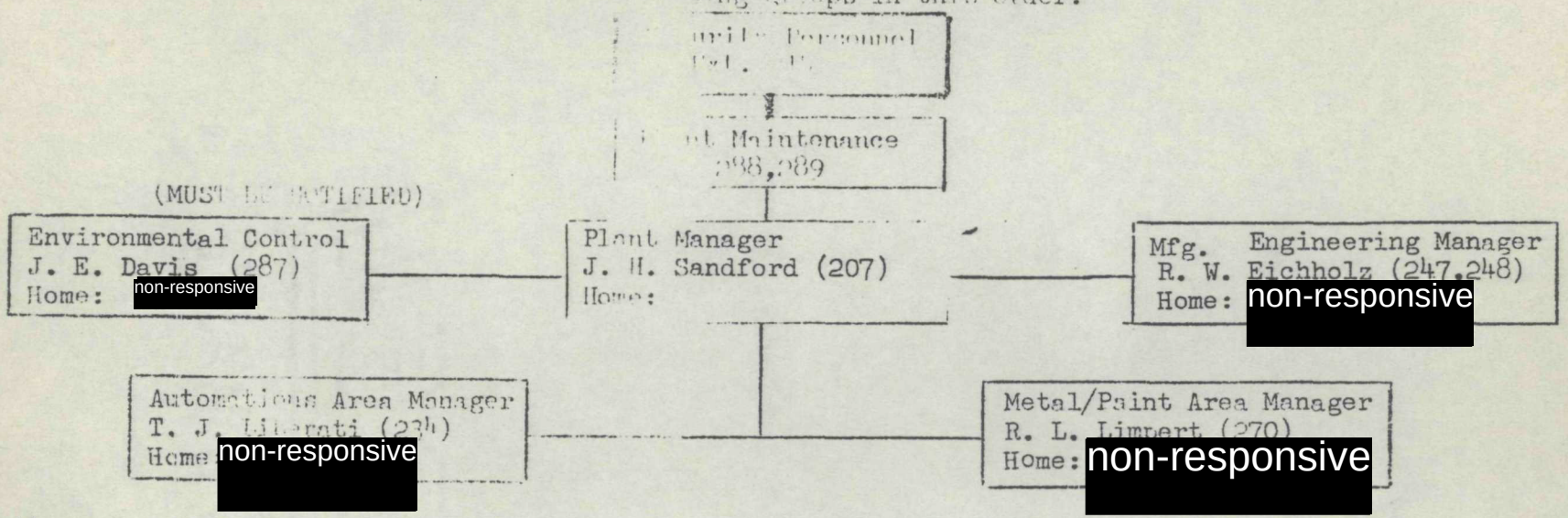
Environmental Control
J. E. Davis (287)
Home: non-responsive

Plant Manager
J. H. Sandford (207)
Home:

Mfg. Engineering Manager
R. W. Eichholz (247,248)
Home: non-responsive

Automations Area Manager
T. J. Liberati (234)
Home non-responsive

Metal/Paint Area Manager
R. L. Limpert (270)
Home: non-responsive



Air Alert

The Ohio Environmental Protection Agency will identify himself and indicate he has an official directive from the Governor of the State of Ohio to declare an alert. The Security Shift Supervisor will first confirm the call by calling the party back. Once confirmed, he will then begin the notification procedure. The Lorain County Air Pollution Officer is Mr. Jim [illegible] or Fred Long, Phone (216) 425-9171.

If he cannot confirm the call, [illegible] incident will be made to the Supervisor, Environmental Control.

If a [illegible] placed [illegible] Control Section, they in turn will call Security to assure [illegible].

Spill Plan

Stop any spills [illegible] most important objective on a spill is to contain it so that it will not go [illegible] Erie. [illegible] procedure folder on Spills located at the Maintenance Shop, Plant Engineering [illegible] Engineer's file. If a spill goes to Lake Erie, it must be reported to the [illegible]

[illegible]

FORD MOTOR COMPANY
OHIO TRUCK PLANT

HAZARDOUS WASTE SUPPLEMENT
AMENDMENT TO SPILL PREVENTION CONTROL AND COUNTERMEASURE
(SPCC)/PLAN

Note: This amendment has been prepared in compliance with Federal [illegible] Management Regulations applicable to Generators (40 CFR 262), [illegible] hazardous waste/storage/disposal facilities which [illegible] interim compliance status (40 CFR [illegible]).

I. Hazardous Waste Activities conducted

A. Hazardous Waste generated

1. Waste water treatment sludges from industrial painting (F018).
(Temporarily suspended by [illegible])

2. Paint residues from industrial painting (F[illegible])
(Temporarily suspended by [illegible])

3. Paint residues from industrial [illegible] ([illegible]).

4. Spent non-halogenated [illegible].

5. Waste commercial chemical [illegible]
[illegible]

[illegible]
require [illegible]
[illegible]y. Storage of [illegible]
[illegible]s than [illegible]
[illegible]r storage [illegible].

[illegible] Prevention

[illegible]. [illegible] Equipment -- In addition to spill containment equipment, portable fire extinguishers and fire hoses are located throughout the plant site. Also, this equipment is located in the vicinity of the flammable waste storage areas.

[illegible]. Arrangements with local authorities -- The plant has forwarded copy of this SPCC Plan to the local police and fire departments and has advised them of current on-site hazardous waste activities. A copy of this SPCC Plan has [illegible] forwarded to our in-plant [illegible].

[illegible]. Inspections -- The plant has amended its Inspection/Checklist to insure that the hazardous waste containers [illegible] above are inspected for leaks, deterioration, corrosion, etc., at the frequency specified. Documentation is maintained at the plant for [illegible] Agency re-

. Containers and tanks---[illegible]

[illegible] Plan and Emergency Procedures

[illegible] emergency call list and discha[illegible] Section III and IV of thi[illegible] Ford personnel as well [illegible] [illegible]tors. A list of avail[illegible]

[illegible] applicable to hazar[illegible] [illegible]ility was start[illegible] [illegible]ich complies with the [illegible] [illegible]pared by Company manage[illegible] [illegible]. This train[illegible] [illegible] Pollutant Spill [illegible] [illegible]his plan.