TSD File Inventory Index

Date: January 17, 2001

Initial: C M Generao

Facility Name: O. J. Transport (One Folder Site)			
Facility Identification Number: MID 005 356 746			
A.1 General Correspondence	X	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	X
.3 Part A Application and Amendments		**C.2 Compliance/Enforcement**	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports	X	**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	X	.3 State Prelim. Investigation Memos	
.1 Correspondence	X	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	X	**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total -1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.
Comments: Documents do not justify individual folder gov schedule.

Public Participation

Westefer 886-7450

PUBLIC VOUCHER FOR ADVERTISING

For Agency Use Only
VOUCHER NUMBER
SCHEDULE NUMBER
PAID BY

DEPARTMENT OR ESTABLISHMENT, BUR OR OFFICE
U.S. Environmental Protection Agency Region V Waste mgmt. Div.

PLACE VOUCHER PREPARED
230 S. Dearborn Chicago, IL 60604

DATE PREPARED
8/08/84

NAME OF PUBLICATION
Detroit News

NAME OF PUBLISHER OR REPRESENTATIVE
The Detroit News

ADDRESS (*Street, room number, city, State, and ZIP code*)
6200 Metro Parkway
Sterling Heights, Michigan 48077

Contact: Rita Sebastian
313 977-7540

CHARGES

TYPEFACE

(*size of type*) POINT PER (*inch, square, word, or folio*)

		NUMBER OR LINES (*Indicate counted or space*)	COST PER LINE	TOTAL COST
Line Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$

		NUMBER OF UNITS (*Indicate inch, square, word, folio*)	COST PER UNIT	TOTAL COST
Other Rates	FIRST INSERTION		$	$
	ADDITIONAL INSERTIONS GIVE NUMBER ▶			
	TOTAL			$

Attach one copy of advertisement (*including upper and lower rules*) to each copy of voucher here. If copy is not available sign the following affidavit.

TOTAL LINE RATES AND OTHER RATES	
LESS DISCOUNT AT %	
BALANCE DUE	$
VERIFIED (*Initials*)	

AFFIDAVIT

This represents a true billing for the attached advertising order, with specifications and copy, which has been completed.

SIGNATURE OF PUBLISHER OR REPRESENTATIVE

TITLE

DATE

FOR AGENCY USE ONLY

ADVERTISEMENT PUBLISHED IN

DATE PUBLISHED

I certify that the advertisement described above appeared in the named publication and that this account is correct and eligible for payment.

SIGNATURE AND TITLE OF CERTIFYING OFFICER

DATE

SIGNATURE AND TITLE OF AUTHORIZING OFFICER

DATE

ACCOUNTING CLASSIFICATION

Estimate $600.00 8/8/84

2540
6840200
4A4E05$002

OTN293

PAID BY CHECK NUMBER

/ If the ability to certify and authority to approve are combined in one person enter "N/A" (*not applicable*) here.

☆ GPO : 1980 O - 311-153 (6100)

RTO 8/9

September 1973
4 Treasury FRM 2000 Standard Form No. 114

ADVERTISING ORDER

51820NALT
ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BUREAU OR OFFICE
U.S. Environmental Protection Agency Region V Waste Mgmt. Div.

DATE
8/08/84

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule below provided the rates are not in excess of the commercial rates charged to private individuals with the usual discounts. It is to be set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN
Detroit News

SUBJECT OF ADVERTISEMENT
Public Notice

EDITION OF PAPER ADVERTISEMENT APPEARED
Tuesday August 21, 1984

NUMBER OF TIMES ADVERTISEMENT APPEARED
One Time Only

DATE(s) ADVERTISEMENT APPEARED
August 21, 1984

SPECIFICATIONS FOR ADVERTISEMENT

Place in Legal Section as Legal Notice

AFFIDAVIT REQUIRED

COPY FOR ADVERTISEMENT

PLEASE SEE ATTACHED PUBLIC NOTICE (2 pages)

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT
NUMBER 51820NALT	NUMBER
DATE August 10, 1984	DATE
SIGNATURE OF AUTHORIZING OFFICIAL Lisa Apelgren	TITLE

INSTRUCTIONS TO PUBLISHERS

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

DEPARTMENT OF HIGHWAYS & TRAFFIC, D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,000 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Sealed bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to ▶

United States Environmental Protection Agency
Financial Operations Section 5MF-14
230 South Dearborn Street
Chicago, Illinois 60604

IMPORTANT

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order.

1143-107

AUG 08 1984

5HW-13

Mr. James Dance
Coordinator of Public Relations
Detroit City Library
5201 Woodward
Detroit, Michigan 48202

Dear Mr. Dance:

Per our telephone conversation, on August 7, 1984, regarding the closure plan for GMC Fisher Body Detroit Central Plants 21, and 40, the following items are enclosed:

- A copy of the closure plans for GMC-Detroit Central
- A copy of the Public Notice to be published in the Detroit News on August 21, 1984, advising the availability of these materials in the Detroit City Library
- A copy of the U.S. EPA regulations on comment and appeal procedures

Thank you for your assistance in making these materials available to the public for review.

As stated in the Public Notice, U.S. EPA Region V is soliciting public comments on the GMC-Detroit Central Plant closure plans until September 21, 1984.

Please retain the materials on file for public access until September 30, 1984. I am enclosing postage and fees paid labels for your return of the documents at that time. Also, please let me know that you have received this material by completing and signing the enclosed verification form. The form should be returned to me in the enclosed self-addressed, postage and fees paid envelope.

Thank you very much for your cooperation in assisting our effort to serve the public.

Sincerely,

Gary Westefer
Environmental Protection Assistant

Enclosures

5HW:WMB:RAIU:WESTEFER:WESTEFER:8/07/84

PUBLIC NOTICE

The U.S. Environmental Protection Agency (U.S. EPA) has received two closure plans from GMC Fisher Body, to close two facilities, Detroit Central Plant 21, located at 6051 Hastings, Detroit, Michigan, and Detroit Central Plant 40, located at 1500 E. Ferry, Detroit, Michigan. Both facilities are manufacturers of tools and dies used in the automotive industry. Both plants are closing their hazardous waste facilities which include a container storage area with a maximum capacity of 80 drums at Plant 21, and 5 drums at Plant 40. The wastes are ignitable and/or corrosive. The closure plans submitted on June 11 and 12, 1984, detail the procedures for removal of all waste from the containers. and decontamination of the storage areas. The wastes will be shipped off-site via a U.S. EPA approved transporter, to a U.S. EPA approved treatment, storage, or disposal facility. Upon completion of closure operations, a registered professional engineer will certify that closure has been completed.

The GMC Fisher Body closure plans were submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register January 12, 1981. The plans are evaluated by U.S. EPA according to the criteria of the regulations.

The two closure plans and related background materials are available to the public at U.S. EPA Waste Management Branch, 230 S. Dearborn, 13th Floor, Chicago, Illinois, (312) 886-7450, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials may also be seen at the Detroit City Library, 5201 Woodward, Detroit, Michigan 48202, (313) 833-4049, during regular business hours.

Public comments concerning this closure plan are requested by U.S. EPA and must be postmarked on or before September 21, 1984. Please send comments to:

United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Gary M. Westefer

RECEIVED
WMD RCRA
RECORD CENTER

Compliance

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278-0012

MAR 05 1993

MID
065 356 746

Fisher Body Division - Gen Motors Div.
3001 Van Dyke
Warren, MI 48090

Dear Environmental Coordinator:

The U.S. Environmental Protection Agency (EPA) is charged with the protection of health and the environment under the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Part 6901 et seq.

Pursuant to the provisions of Section 3007, 42 U.S.C. Part 6927, we hereby require that you provide the information requested in Attachment II to this letter using the instructions and definitions included in Attachment I.

Please provide the information requested no later than thirty (30) calendar days from receipt of this letter. The response must be signed by a responsible official or agent of your company.

The response to the request in the attachment must be mailed to the following addressee:

Betsy Donovan
Environmental Scientist
Hazardous Waste Compliance Branch
U.S. Environmental Protection
Agency - Region II
26 Federal Plaza
New York, New York 10278

Subject to 40 C.F.R. Part 2, you may assert a business confidentiality claim covering all or part of the information herein requested. The claim should set forth the information requested in 40 C.F.R. Part 2.203(b) and is subject to challenge. 40 C.F.R. Section 2.208 sets forth the substantive criteria used in making determinations regarding confidentiality. Information covered by a confidentiality claim will be disclosed by EPA only to the extent permitted by, and by means of procedures set forth in, 40 C.F.R. Part 2. [illegible] such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.

PRINTED ON RECYCLED PAPER

This information request meets the requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Part 3501 et seq.

Failure to respond to this letter truthfully and accurately within the time provided may subject the company to an enforcement action pursuant to Section 3008 of RCRA, 42 U.S.C. Section 6928.

If you have any questions about this letter, please call Betsy Donovan of my staff at (212) 264-0216. Your cooperation is appreciated.

Sincerely yours,

Original signed by
Conrad Simon

Conrad Simon, Director
Air & Waste Management Division

Attachments

cc: Jim Sygo, Chief
Waste Management Division
Environmental Protection Bureau
Michigan Department of Natural Resources

William E. Muno, Director
Waste Management Division
U.S. EPA Region V

A.2 Part A/
Interim Status

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

(17)

REPLY TO ATTENTION OF:
5HW-13

Vern W. Johnson, Environmental Engineer
GMC Fisher Body Division
Detroit Central Plants
6051 Hastings Street
Detroit, MI 48211

RE: Permit Application Withdrawal Letter
FACILITY NAME: GMC Fisher Body Detroit Central Plant #40
U.S. EPA ID NO.: MID 005 356 746

Dear Mr. Johnson:

This is to acknowledge receipt of your letter of August 26, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

OK TO MAIL JS 10/7/83

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: C. Kato, General Manager
cc: Karl Hammack

"Send enclosures for Small Quantity Generator"

OK
OW
9/7/83

Enclosure

Plant Engineer

John Zammit ~~Plt. Eng.~~
GMC Fisher Body
Detroit Central Plant 40
6051 Hastings
Detroit, MI 48211

RCRA ACTIVITIES

RE: Request for Information-Hazardous Waste Permit Review (Small Quantity Generator)
FACILITY NAME: GMC Fisher Body Detroit Central Plant 40
USEPA ID NO.: MID 005 356 746

Dear

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to qualify as a small quantity generator as defined in 40 CFR Part 261.5 (enclosed). Please review these requirements to determine if your facility qualifies as a small quantity generator from November 19, 1980 to the present. If it does, a permit is not required and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn. If at any time, since November 19, 1980, your operation (1) did not qualify for the special requirements for generators of small quantities of hazardous wastes, and (2) included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265 Subpart 6.

If the information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is
30 received in this office within ~~60~~ days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please do not hesitate to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information, Small Quantity Generator" in all telephone contacts and correspondence.

Sincerely yours,

cc C. Katko, General ~~Mgr.~~ Manager

OIC 8/23/82

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

(2)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

31 AUG 1982

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

John Zammit, Plant Engineer
GMC Fisher Body-Detroit Central Plant 40
6051 Hastings
Detroit, Michigan 48211

RE: Request for Information--Hazardous Waste Permit Review (Small Quantity Generator)
FACILITY: NAME: GMC Fisher Body-Detroit Central Plant 40
USEPA ID NO.: MID 005 356 746

Dear Mr. Zammit:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to qualify for the small quantity generator exclusion as defined in 40 CFR Part 261.5 (enclosed). Please review these requirements to determine if your facility qualifies for the small quantity generator exclusion from November 19, 1980, to the present. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn. If at any time, since November 19, 1980, your operation (1) did not qualify for the special requirements for generators, of small quantities of hazardous wastes, and (2) included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265 Subpart G.

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please do not hesitate to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information--Small Quantity Generator," in all telephone contacts and correspondence on this matter.

Sincerely, yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: C. Katko, General Manager

8/31/82

17

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

5HW-13

JAN 27 1984

Joe Fannon, Environmental Engineer
GMC-Fisher Body
Detroit Central Plants
6051 Hastings Street
Detroit, MI
48211

RE: Permit Application Withdrawal Letter
(Insufficient Information)
FACILITY NAME: GMC Fisher Body Detroit Central Plant 40
U.S. EPA ID NO.: MID 005 356 746

Dear Mr. Fannon:

This is to acknowledge receipt of your letter of August 26, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

Please do not hesitate to contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter, (Insufficient Information)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

Same Add. As Above } cc: C. Katko, General Manager

(Please send store for less than 90 enclosures)

OK
11/16/83

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → • MID005356746 REACKNOWLEDGEMENT

GMC FISHER BODY DETROIT CENT PLTS 40
6051 HASTINGS
DETROIT MI 48211

INSTALLATION ADDRESS → 1500 EAST FERRY
DETROIT MI 48211

EPA Form 8700-12B (4-80) 10/03/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE
III. LOCATION OF INSTALLATION	

000324 AUG 15 80

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F MID005356746 T/A 2 C 1

APPROVED: A

DATE RECEIVED (yr., mo., & day): 800814

GENERAL MOTORS CORP
FISHER BODY #40

I. NAME OF INSTALLATION

FISHER BODY DETROIT CENTRAL PLANTS #40

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 6051 HASTINGS

CITY OR TOWN: 4 DETROIT — ST.: MI — ZIP CODE: 48211

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 1500 EAST FERRY

CITY OR TOWN: 6 DETROIT — ST.: MI — ZIP CODE: 48211

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 ZAMMIT JOHN PLANT ENGINEER

PHONE NO. *(area code & no.)*: 313-556-1156

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 GENERAL MOTORS CORPORATION

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [X] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [X] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MID005356746

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 14 1980

CONTINUE ON REVERSE

PLT 40

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	M	1	D	0	0	5	3	5	6	7	4	6	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F002	F003	F005		
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U239	U002	U226			
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [ ] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
T. E. Clifford	PLANT MANGER T. E. CLIFFORD	8-8-80

EPA Form 8700-12 (6-80) REVERSE

AUG 14 1980

Fisher Body
Division of General Motors Corporation

GM

General Offices
30001 Van Dyke Avenue
Warren, Michigan 48090

September 7, 1984

U.S. EPA Region V
Waste Management Branch
RCRA Activities
P.O. Box 3587 A
Chicago, Ill. 60690

RECEIVED
SEP 10 1984
WMD-RAIU
EPA, REGION V

Attn: Karl J. Klepitsch

Re: Permit Application Withdrawal Letter
(Insufficient Information)
Fisher Body Division GMC - Detroit Central Plants:
#21 - EPA ID NO. MID 980568646 G, TRS, TSD, PA, 9
#37 - EPA ID NO. MID 980568760 G, TSD, PA, 9
#40 - EPA ID NO. MID 005356746 G, TRS, TSD, PA, 9

Dear Mr. Klepitsch;

On August 26, 1983 a letter was sent to Ms. Dianne Parker of the RCRA Activity Section requesting withdrawal of the part A hazardous waste permits for the Fisher Body Detroit Central Plants #21,#37, & #40. On January 26, 1984 I recieved a letter from your office requesting additional information regarding our withdrawal requests. It stated that unless additional information was supplied within 30 days the subject facilities will continue to be regulated under interim status for treatment, storage and disposal facilities. Prior to receipt of this letter it was learned that these plants were under consideration for possible closure. Consequently further action pertaining to a part A withdrawal was suspended until final disposition of these plants could be ascertained.

On March 30, 1984 all production activities were ceased at plants #21 and #40. Closure plans for these plants were submitted to the Regional Administrator of the Region V Waste Management Branch on July 2, 1984.

Plant #37 is to remain open and will be operated under the control of the General Motors B-O-C Plant in Grand Blanc, Michigan. It is our desire to proceed at this point with a part A withdrawal for this plant as originally planned. The additional information requested by your office will be supplied under separate letter head from the Grand Blanc Plant.

As a final point, on July 9, 1984 I received a letter from your office stating that you have not yet received any financial instruments as proof of financial assurance for closure of the Detroit Central Plants. I immediately contacted Mr. Oliver Warnsley to inform him that we had submitted this information as part of a corporate package in February 1984. In order to update your files I nevertheless forwarded a copy of the financial information to Mr. Warnsley on July 17, 1984.

If you have any questions regarding any of these matters please contact me at 313-575-5665.

Joseph P. Fannon

Joseph P. Fannon
Sr. Plant Engineer
Works Engineering Activity

cc: V. Johnson

0596R

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW-13

7 OCT 1983

Vern W. Johnson, Environmental Engineer
GMC Fisher Body Division
Detroit Central Plants
6051 Hastings Street
Detroit, Michigan 48211

RE: Permit Application Withdrawal Letter
FACILITY NAME: GMC Fisher Body Detroit Central Plant #40
U.S. EPA ID NO.: MID 005 356 746

Dear Mr. Johnson:

This is to acknowledge receipt of your letter of August 26, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: C. Kato, General Manager
Karl Hammack

Fisher Body
Division of General Motors Corporation

General Offices
30001 Van Dyke Avenue
Warren, Michigan 48090

17

October 3, 1983

Subject: Delegation of Authority to Sign Permit Applications under EPA Permit Programs

From: C. Katko

To: C. Pearson
Detroit Central Plants Manager

MID 980 568 646 PA,G,TRS,T
MIT 270010077 - Old ID #
MID 005 356 746 PA,G,TRS,T

As provided under 40 CFR 122.22, 144.32, 233.6 and 270.11 of the "Environmental Permit Regulations", the position of plant manager is hereby designated as my duly authorized representative for Fisher Body Detroit Central Plants. As such, the plant manager is authorized to sign all permit applications, all reports required by permits, and other information requested by EPA or a corresponding state or municipal agency, submitted for the following programs:

1. National Pollutant Discharge Elimination System (NPDES) of the Clean Water Act (40 CFR 122)

2. Underground Injection Control Program of the Safe Drinking Water Act (40 CFR 144)

3. Dredge of Fill (404) Program of the Clean Water Act (40 CFR 233)

4. Hazardous Waste Permit Program of the Resource Conservation and Recovery Act (40 CFR 270)

In the absence of the individual occupying the designated position due to vacation, illness, or other reasons, the individual temporarily responsible for the operation of the facility or activity is my duly authorized representative.

C Katko

C. Katko

Not file copy

Fisher Body
Division of General Motors Corporation

Detroit Central Plants
6051 Hastings Street
Detroit, Michigan 48211

RECEIVED
SEP 02 1983
WASTE MANAGEMENT BRANCH
EPA, REGION V

SUBJECT: Hazardous Waste Permits For The D.C.P. Complex (Plts. #21, #40, & #37)

August 26, 1983

TO: Dianne Parker

As per your request during our telephone conversation, the following information is being supplied in order to establish the types of Hazardous Waste Permits required at this Detroit Central Plants Complex,(Plts. #21, #40. & #37):

Plant #21 MID 980568446 G, T, TSO, PA 6051 Hastings Detroit, MI

Permit required at this location remains the same as that in the past - "Hazardous Waste Small Quantity Generator & Storage".

Plant #40 MID 005356746 G, T, TSO, PA 1500 C. Fury Detroit, MI

Operations at this facility were terminated in March, 1983. In as much as hazardous wastes have been properly disposed of, Small Quantity Generator Permit is no longer needed.

Plant #37 Not on P. O.

Although this facility is a small quantity generator of hazardous wastes, the permit should authorize limited-time storage. Such authorization will allow the hazardous waste disposal vendors to make pickups of stored waste at Plant #37, therefore alleviating the need for Plant #21 vehicle to be licensed to transport waste - generated at Plant #37 - to the storage area at Plant #21.

Questions should be directed to the writer.

Respectfully yours,

V. W. Johnson
Environmental Engineer

VWJ

NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF
DATE 9/06/83

RECEIVED
9/02/83

General Motors Parts Division
General Motors Corporation

Inter-Organization Letter

005 356 746
G A TSD PA

To See Below

Location

From Mr. J. W. Cagle

NR

Location

MID 005356746

Subject Delegation of Authority to Sign Reports Under EPA Consolidated Permit Programs

Date March 24, 1981

TO: All Parts Plant Managers
All P.D.C. Managers
All Truck and Coach Managers

As required under Environmental Protection Agency Consolidated Permit Programs, Part 122, Section 122.6, the position of Plant Manager is hereby designated as my duly authorized representative for your facility. As such, the Plant Manager is authorized to sign all reports required by permits, and other information requested by the EPA Regional Administrator and/or the State/Local Program Director.

In the absence of the person occupying the designated position due to vacation, illness, or other reasons, the person temporarily responsible for the operation of the facility or activity is my duly authorized representative.

Any questions should be directed to the Environmental Control Group - Flint Central Office.

J. W. Cagle
General Manager
General Motors Warehousing and Distribution Division

JWC/vp

cc: EPA Regional Administrator

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e. 12 characters/inch).

Form Approved OMB No. 158-R0175 221

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGEN

GENERAL INFORMATION

Consolidated Permits Program
(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F MI D 005 356 746 3 D

LABEL ITEMS

- EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)	16	X 17	18	B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)	19	X 20	21
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	22	X 23	24	D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)	25	X 26	27
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X 28	29	X 30	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)	31	X 32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	34	X 35	36	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)	37	X 38	39
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	40	X 41	42	J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)	43	X 44	45

III. NAME OF FACILITY

1 SKIP GMC FISHER BODY DETROIT CENTRAL PLANT 40

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*		
2 ZAMMIT JOHN PLANT ENGINEER	313	556	1156

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 6051 HASTINGS

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 DETROIT	MI	48211

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 1500 E. MILWAUKEE

B. COUNTY NAME

WAYNE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 DETROIT	MI	48211	163

11-19-80

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
7 3544 (specify) Special dies & tools	7 (specify)
C. THIRD	**D. FOURTH**
7 (specify)	7 (specify)

VIII. OPERATOR INFORMATION

A. NAME: 8 GMC FISHER BODY DETROIT CENTRAL PLANT

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)

P (specify)

D. PHONE (area code & no.): A 313 556 1156

E. STREET OR P.O. BOX: 6051 HASTINGS

F. CITY OR TOWN: B DETROIT

G. STATE: MI

H. ZIP CODE: 48211

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N N/A	**D. PSD** (Air Emissions from Proposed Sources): 9 P N/A
B. UIC (Underground Injection of Fluids): 9 U N/A	**E. OTHER** (specify): 9 APCO-03254-APCO-03264 (specify) Wayne County Air Pollution Permits
C. RCRA (Hazardous Wastes): 9 R N/A	**E. OTHER** (specify): 9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline 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, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

Construction of special Dies and Tools, die sets, Jigs & Fixtures including Prototype and models.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
C. Katko, General Manager	C Katko	11-18-80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

221

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S: F M I D Ø Ø 5 3 5 6 7 4 6 3 T/A: 1 C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C: 8

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
24	Ø1	Ø1

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S: C DUP T/A: 3 C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S Ø 1	110	G	
2				
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

CONTINUE ON REVERSE

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, 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 column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column 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 column 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 column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III 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: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

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

EXAMPLE FOR COMPLETING ITEM IV *(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 operation. 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 NO.	A. EPA HAZARD. WASTE NO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in 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*

CONTINUE ON PAGE 3

Continued from page 2.
NOTE: Photocopy this page before comp[illegible]g if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

221

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
S W M I D Ø Ø 5 3 5 6 7 4 6 T/A 3 C 1	S W DUP T/A 3 C 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F Ø 1 7	5ØØØØ	P	S Ø 1	
2	F Ø Ø 3	2 ØØØØ	P	SØ 1	
3	D Ø Ø 1	5ØØØØ	P	S Ø1	
4	D Ø Ø 2				Included with above
5	F Ø Ø 1	25ØØØ	P	S Ø 1	
6	F Ø Ø 2	25000	P	S Ø 1	
7	F Ø Ø 5	25000	P	S Ø 1	
8	D Ø Ø 3	25000	P	S Ø 1	
9	U 2 3 9	25000	P	S Ø 1	
10	U 2 2 6				Included with above
11	U Ø Ø 2				Included with above
12	F Ø 1 8	50000	P	SØ1	
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

EPA Form 3510-3 (6-80)

CONTINUE ON REVERSE

(enter "A", "B", "C", etc. behind the "3" to identify photocopied pages)

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

F M I D Ø Ø 5 3 5 6 7 4 6 3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: A/55

VI. PHOTOGRAPHS

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).* F6: N/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
42 22 21Ø	Ø83 Ø3 38Ø

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E [illegible]	[illegible]

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F [illegible]	G [illegible]	[illegible]	[illegible]

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
C. Katko, General Manager	C Katko	11-18-80

X. OPERATOR CERTIFICATION

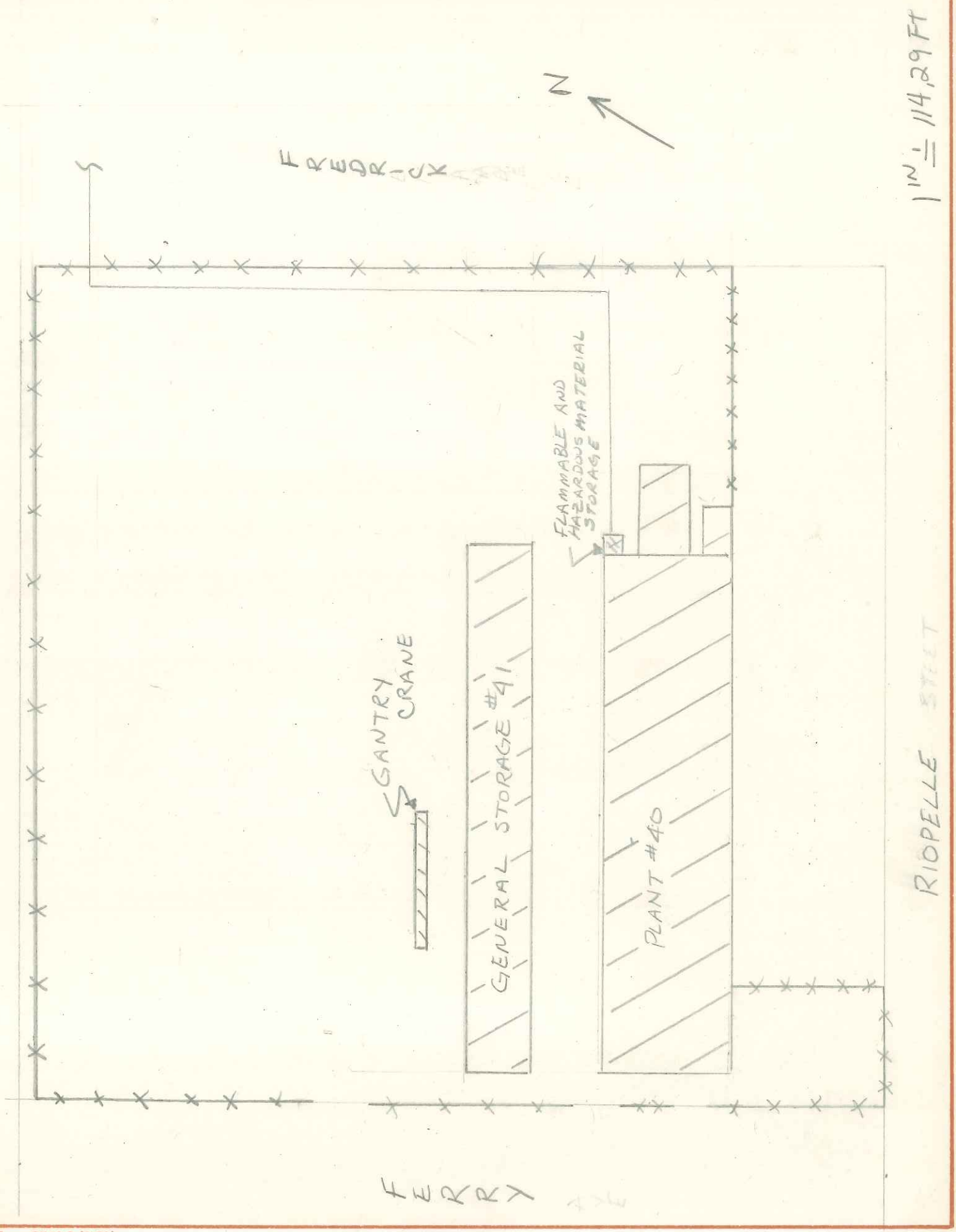
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

CONTINUE ON PAGE 5

Continued from page 4.

V. FACILITY DRAWING *(see pag*



FISHER BODY DIVISION
GENERAL MOTORS CORPORATION
FLEETWOOD PLANT
W. FORT STREET & WEST END AVE.
DETROIT, MICHIGAN 48209

November 1, 1980

file

Y. J. Kim
EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, IL 60680

Re: Notification of Hazardous Waste Activity for
Fisher Body Division - GMC - Fleetwood Plant
W. Fort St. & W. End Ave
EPA ID No. MID005356746

Dear Sir:

Subsequent to our submission to your office of EPA Form 8700-12 on August 15, 1980, it has come to our attention that certain information was inadvertently omitted from our Notification of Hazardous Waste Activity.

Pursuant to advice General Motors received from EPA personnel in Washington, we are requesting that the EPA Form 8700-12 submitted for the facility identified above be modified to reflect the hazardous waste activities shown below. Please note that this facility has been assigned an EPA identification number.

The following information was inadvertently omitted:

Part IX. A. Hazardous Wastes from Non-Specific Sources -
No. F005 and No. F018

Please incorporate this additional information on EPA Form 8700-12 for this facility. If you have any questions, please contact B.J. Napolitan at (313) 554-7247.

L. D. Richards
Plant Manager

NOV 11 1980

122
UTM GRID AND 1973 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET
SCALE 1:24,000
1000 0 FEET
USGS MAP COMPOSITE OF DETROIT, MICH.-ONT. & HIGHLAND PARK, MICH.
LOCATION MAP
GMC-FISHER BODY DIV.
PLANTS 21, 37, 40
DETROIT CENTRAL PLTS
83°5'
42°22'30"
HAMTRAMCK
DETROIT
21
37
40
WAYNE STATE UNIV

Do not make entries in shaded areas

OMB#: 2050-0024 Expires: 12-31-86

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

1 Non-handler
2 Small Quantity Generator
4 Exempt
5 Beneficial Use
9 Closed

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

☐ For 1983 Only ☐ Permanently

☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

II. GENERATOR'S EPA I.D. NUMBER

T/A C

F M I D 0 0 5 3 5 6 7 4 6 1 (1–2, 13–15)

9 TSD

III. NAME OF INSTALLATION

GMC FISHER BODY DIVISION PLANT #40 (30–69)

IV. INSTALLATION MAILING ADDRESS

3605 1 HASTINGS STREET (15–45)

Street or P.O. Box

4 DETROIT (15–16) | MI (41–42) | 48211 (47–51)

City or Town | State | Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5 1500 FERRY STREET (15–45)

Street or Route number

6 DETROIT (15–16) | MI (41–42) | 48211 (47–51)

City or Town | State | Zip Code

VI. INSTALLATION CONTACT

2 JOHNSON, VERNELL W (15–45)

Name (last and first)

313-556-0937 (46–55)

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Carl Pearson	Plant Manager	Carl Pearson	2/16/84
Print/Type Name	Title	Signature of Authorized Representative	Date Signed

EPA Form 8700-13A(5-80) (Revised 11-83)

Tear out here

Do not make entries in shaded areas

E' 'RONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

ate rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

T/A C

G M T D 0 0 5 3 5 6 7 4 6 1

1 2 13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CHEM - MET

X. FACILITY'S EPA I.D. NO.

F M T D 0 9 6 9 6 3 1 9 4

16 28

XI. FACILITY ADDRESS

18550 Allen Road
Wyandotte, Michigan 48192

XII. TRANSPORTATION SERVICES USED

Own Commercial Vehicle

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)		D. Amount of Waste	E. Unit of Measure
	1	Waste Paint & Paint Thinner	07	U220 F017	U239	3060	P
	2	Poly_urethane	10	U223		528	P
	3	Hardener/Resin/Glue Sludge	10	U107	U223	2376	P
	4						
	5						
	6						
	7						
	8						
	9						
	10						
	11						
	12						

XIV. COMMENTS (enter information by section number—see instructions)

A.4 Closure/Post-Closure

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

OCT 26 1984

REPLY TO ATTENTION OF:
5HW-13

Mr. Carl Pearson
Plant Manager Detroit Central Plant
No. 21
Fisher Body
Division of General Motors
6051 Hastings
Detroit, Michigan 48211

Re: Closure Plan
MID 980568646 and
MID 005356746 ← Plant # 40

Dear Mr. Pearson:

On July 2, 1984, Fisher Body Division submitted closure plans for its Detroit Central Plant No. 21 and Plant No. 40. The plans call for removal of all hazardous waste for off-site disposal and decontamination of storage area and equipment. A 30-day comment period ended September 21, 1984, and the Agency received no comments.

The closure plans for Detroit Central Plant No. 21 and Plant No. 40 are hereby approved. Please submit the appropriate certification upon completion of closure, in accordance with 40 CFR 265.115. If you have any questions, please contact David Homer of my staff at (312) 886-6146, for assistance.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

cc: Joseph P. Fannon
Fisher Body (Division of GMC)

Alan J. Howard, MDNR

Yellow Copy

Mi

Fisher Body
Division of General Motors Corporation

General Offices
30001 Van Dyke Avenue
Warren, Michigan 48090

July 2, 1984

RECEIVED
JUL 18 1984
WMD-RAIU
EPA, REGION V

Regional Administrator
U.S. Environmental Protection Agency Region V
Waste Management Branch
230 Dearborn St.
Chicago, Illinois 60604

Gentlemen:

MID005356746 MID 980568646

The Fisher Body Detroit Central Plants 21 (EPA ID #MID ~~005356621~~) and 40 (EPA ID #MID ~~980568760~~) are scheduled to cease operations.
G, TSD, PA G, TSD, PA, 9

We hereby submit our closure plans for the above two plants for approval per Federal Register Regulation #265.12.

If you have any questions regarding this matter, please contact Joe Fannon at Fisher Body General Offices, Works Engineering - Telephone No. 313-575-5665.

Sincerely,

FISHER BODY DIVISION
General Motors Corporation

Carl Pearson

Carl Pearson
Plant Manager
Detroit Central Plant No. 21

RB/gw
1269G
cc: M.P. Zdyb - Environmental Activity Staff
W. Collingson - Environmental Activity Staff
V. Johnson - Fisher Body General Offices, Safety
J.P. Fannon - F.B. General Offices, Works Engineering
R.J. Phillips - F.B. General Offices, Works Engineering

Encl. Closure Plan - Plant 21
Closure Plan - Plant 40

RECEIVED
JUL 16 1984
WASTE MANAGEMENT BRANCH

RECEIVED
JUL 16 1984
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

FISHER BODY DIVISION, GMC
Detroit Central Plant #40
ID #MID ~~980568760~~
005356746

1. Closure Plan

This section is submitted in accordance with the requirements of 40 CFR 265 Subpart G. This plan identifies all steps that will be necessary to completely close the facility at the end of its operating life. A post-closure plan is not required since all wastes are being removed at closure.

a. Closure Performance Standards

This closure plan was designed to ensure that the facility will not require further maintenance and controls, minimizes or eliminates threats to human health and the environment, and avoids escape of hazardous waste, hazardous waste constituants, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters on the proper handling of hazardous waste absorbent materials. Vacuum cleaners and necessary handling equipment will be used to minimize spills and provide containment if a spill should occur.

b. Final Closure Activities

Final closure activities will begin as soon as possible.

c. Maximum Waste Inventory

All hazardous waste storage is conducted in a 4' x 5' pad located inside the flammable storage room. This room is curbed and contains no drains. Hazardous waste placed here consists mainly of waste maintenance paints, thinners, cleaners and miscellaneous cleaners (D001) used in plastic tooling operations. This area has the capacity of 2-3 drums.

d. Inventory Removal, Disposal, and Equipment Decontamination

The services of a licensed hazardous waste disposal contractor will be purchased to remove and properly dispose of all hazardous materials.

The hazardous waste storage pad will be inspected and all residual materials will be removed. The trench and the total drum storage area will be steam cleaned and washed with a 5% alkali detergent solution as deemed necessary. All residue will be properly containerized and disposed of.

d. Inventory Removal, Disposal, and Equipment Decontamination (Continued)

An independent registered professional engineer will certify that all closure activities have been completed according to plan and the requirements of 40 CFR 265.114 have been met.

e. Schedule for Closure

This facility does not have a definite closure date. The following schedule is open-ended.

Day 1-40: Final transfer of all in-plant hazardous wastes to drum storage pad.

Day 41-50 Final receipt of hazardous waste at drum storage pad. Proper disposal of all stored wastes will be accomplished utilizing an outside disposal service.

Day 51-79 The hazardous waste drum storage pad will be cleaned and decontaminated per item d.

Day 80 Closure complete.

Day 85 Certification of closure by independent registered professional engineer.

2. Post Closure Plans (265.117-118)

Post closure care will not be needed for this facility since no hazardous wastes have been disposed of at this site.

3. Notice in Deed and Notice to Local Land Authority (265.119-120)

Because this plant has never functioned as a disposal facility, but has operated solely as a storage facility, notation is not necessary in the deed informing potential purchasers of restrictions associated with future use of site as required by 40 CFR 265.120.

4. Closure Cost Estimate (265.142)

Hazardous waste drum removal	5 drums 8 man hrs.	$ 75/drum $ 30/man hr.	$ 375 $ 240
Closure certification			$ 500
		Subtotal	$ 1,115
15% administrative expense 15% contingencies			$ 167 $ 167
		TOTAL	$ 1,449

2319N

Engineers
Architects
Planners

2002 Hogback Road
Suite 16
Ann Arbor
Michigan 48104
313 973-0700

The Chester Engineers

Ref. No. 3146-12

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

FISHER BODY DETROIT CENTRAL PLANTS 21 AND 40

I, Dennis A. Faust, a registered professional engineer, attest that I have made visual inspection of the Fisher Body Detroit Central Plants 21 and 40 relative to hazardous waste closure certification procedures delineated in 40 CFR 265 Subpart G. Specifically, I personally inspected the following facilities:

1. Fisher Body Central Plant No. 21 (ID No. MID 980568646)

   - Hazardous waste drum storage area outside plant
   - Bonderite phosphatizing plater area inside plant
   - Cyanide heat treat pot area inside plant

2. Fisher Body Central Plant No. 40 (ID No. MID 005356746)

   - Hazardous waste storage area located inside flammable storage room.

Accordingly, I certify that closure of the aforementioned facilities have been performed in accordance with the facility's closure plans.

Dennis A. Faust

Dennis A. Faust, P.E.
Chief Engineer
The Chester Engineers

10/24/84
Date

No. 21386
Professional Engineer License Number

Michigan
For State of

Business Address: The Chester Engineers
2002 Hogback Road, Suite 16
Ann Arbor, Michigan 48104
313/973-0700

STATE OF MICHIGAN
DENNIS
A. FAUST
ENGINEER
No.
21386
REGISTERED PROFESSIONAL ENGINEER

Chevrolet-Pontiac-Canada Group
Headquarters
General Motors Corporation
30001 Van Dyke Avenue
Warren, Michigan 48090-9020

RECEIVED
NOV 20 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

October 10,1985

Mr. Basil G. Constantelos, Director
United States Environmental Protection Agency
Region V
Waste Management Division
230 South Dearborn Street
Chicago, Ill. 60604

RECEIVED
NOV 20 1985
U.S. EPA, REGION V

RECEIVED
OCT 16 1985
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Re: Closure Certification
Fisher Body Division
General Motors Corporation
Detroit Central Plants: #21 - MID 980568646 C TR TSD PA 8
#40 - MID 005356746 C TR TSD PA 8

Dear Mr. Constantelos,

The purpose of the letter is to fulfill the requirement for closure certification for two former Fisher Body Detroit Central Plants; Plant #21, located at 6051 Hastings Avenue, Detroit Michigan, and Plant #40, located at 1500 Ferry Street, Detroit, Michigan. This includes the attached letter from a registered professional engineer certifying that the two aforementioned facilities were closed in accordance with the approved closure plans, as well as the following owner/operator certification of closure.

I certify that all hazardous waste previously stored at Plant #21 and #40 for greater than 90 days has been permanently removed, and for that portion of the waste that was present on site on or after November 19, 1980 the manifests requirements for 40 CFR Part 262 have been complied with, and all manifests are on file in the central vault at C-P-C Headquarters, Warren, Mich. (entitled "Hazardous Material Disposal 1979-1983, Detroit Central Plants") available for inspection by authorized federal and state officials.

I also certify under penalty of law that I have personally examined and am familiar with the information submitted in the document and all attachments, and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

RECEIVED
OCT 22 1985
SOLID WASTE BRANCH
U.S. EPA, REGION V

Respectfully,

Charles J. Rowe
Project Manager
Stamping Plant Modernization

C.2 Compliance And Enforcement

RCRA INSPECTION REPORT

EPA Identification Number: M I D 0 0 5 3 5 6 7 4 6

Installation Name: GMC Fisher Body Plant 40

Location Address: 1500 E. Milwaukee

City: Detroit State: MI

Date of Inspection 11-20-85 Time of Inspection (from) _____ (to) _____

Person(s) Interviewed	Title	Telephone
George Rhit	Plant Supervisor	313-556-1219

Inspector(s)	Agency/Title	Telephone
Faye Dade	MDNR/Water Quality Specialist	459-9180

Installation Activity (mark only one box)	Inspection Form(s)
☐ Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation	A
☐ Treatment/Storage/Disposal (No Generation or Transportation)	A
☐ Generation and Transportation	B,C
☐ Generation Only	B
☐ Transportation Only	C

The Facility is closed Down.
The site is occupied by another Company.

Brigill Trucking

Inspection Form C

	YES	NO	NI	Remarks
Section A: SCOPE OF INSPECTION				
1. Complete this inspection form for transporters of hazardous waste subject to 40 CFR 263.10.				
2. Does the transporter transport hazardous waste into the U.S. from abroad?		X		
3. Does the transporter transport hazardous waste out from the U.S.?		X		
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container.		X		
Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)				
1. Are copies of completed manifests available for review and retained for three years. 263.22				Only in Business for Jan - March 85
2. Estimate the number of manifests for shipments completed during the part 6 months.				≈40 for above period
3. Examine a representative number of manifests. Indicate number examined.	≈20			
4. Did transporter properly sign and date the manifests examined?	X			
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21		X		
If (5) is "no," skip 6 and 7.				
6. Do any manifests indicate shipments delivered to other than an alternate facility?				
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?				

RCRA INSPECTION REPORT

EPA Identification Number: MID 085805224

Installation Name: BRIGHL TRUCKING Co

Location Address: 16751 MERRIMAN RD

City: ROMULUS State: MI 48174

Date of Inspection 11/12/85 Time of Inspection (from) 3:00 (to) 3:30

Person(s) Interviewed 11/14/85 on phone off site

Person(s) Interviewed	Title	Telephone
ROBERT GILSTORFF	PRES.	(313) 941-2496

Inspector(s)	Agency/Title	Telephone
MARGARET FIELDS	MDNR/WRS	(313) 459-9180

Installation Activity (mark only one box)	Inspection Form(s)
[ ] Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation	A
[ ] Treatment/Storage/Disposal (No Generation or Transportation)	A
[ ] Generation and Transportation	B,C
[ ] Generation Only	B
[X] Transportation Only	C

Transported hazardous waste only during a four month period* during which she was licensed. Is no longer transporting

*Manifests were completed as required.

965
4-19-83
Code O

#1458

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
JACOB A. HOEFER
CARL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

February 15, 1983

Mr. Ken Rapske
GMC Fisher Body
Detroit Central Plant 21
6051 Hastings
Detroit, Michigan 48211

MID 005 356 746

Re: GMC Fisher Body, Plant 40
MID 980568760
1500 East Ferry

Dear Mr. Rapske:

On January 28, 1983, Plant 40 records were reviewed to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The company notified the U.S.E.P.A. in November 1980, that the facility was a generator and storer of hazardous waste and subject to the Act.

The Subtitle C violations found in the previous, March 1982, inspection have been corrected and no other deficiencies were found.

Thank you for your cooperation. Contact me at (313) 675-0860, if you have any questions.

Sincerely,

William E. Stone

William E. Stone
Water Quality Specialist
Compliance Section
Hazardous Waste Division

WES/sc

cc: Ken Burda (3)

MICHIGAN
THE GREAT LAKE STATE

R1026 1/79

gcs
4-19-83
Code O

#1458

RCRA Inspection Report

EPA Identification Number: M I D 6 0 5 3 5 6 7 4 6

Installation Name: GMC Fisher Body Plant 40 (Detroit Central Plts)

Location Address: 1500 E. Milwaukee

City: Detroit State: Mich. 48211

Date of inspection: 1/28/83 Time of inspection (from) 1p (to) 4:30p

Person(s) interviewed	Title	Telephone
Ken Rapske	Engineering	313) 556-1156

Inspector(s)	Agency/Title	Telephone
William E. Stone	MI DNR-HWD/WQS	313) 675-0860

Installation Activity (mark only one box)	Inspection Form(s)
[X] Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation	(A)
[ ] Treatment/Storage/Disposal (no generation or Transportation)	A
[ ] Generation and Transportation	B, C
[ ] Generation only small quantity	B
[ ] Transportation only	C

cc: Ken Burda (3)
Ken Rapske

Hazardous Waste Inspection

GMC Fisher Body Plant 40
1500 E. Milwaukee
Detroit, Michigan 48211

MID 605356746

January 28, 1983

The facility notified as a generator and storage facility. They have never stored and do not plan on storing hazardous waste but wish to be considered a storage facility.

An inspection was conducted in FY '82 and a number of violations of 40 CFR 262 and 265 were found. This inspection confirmed that those deficiencies have been corrected and no new problems were found.

The plant generates and acculates only small quantities (150 gal/ quantities) of one waste stream (ignitables: waste paint & mixed solvents). The waste is placed in drums and transferred prior to accumlation of 1000 kg to GMC Fisher Body Plant 21 by GM vehicles under Act 136 manifest. Plant 21 is a TSD with Interim Status. The plant meets the 40 CFR 261.5 Exclusions for small quantity generators.

The facility may be in violation of Act 64 Rule 299.6203(2)(b) since it generates and accumulates over 100 kg of hazardous waste and the waste is not delivered directly to a facility licensed under Act 64. However, Plant 21 is serving as a transfer facility. It keeps Plant 40's waste in its contained "RCRA Hazardous Waste Management Facility" with its own waste. All the waste is transported by a Act 64 licensed hauler to a disposal facility licensed under Act 64.

The GM vehicle that transfers the wastes from Plant 40 to Plant 21 does not need to be licensed under Act 64 or 136 and the shipment does not have to be manifested.

sc

cc: Ken Burda (3)
Ken Rapske

C 1C Fisher Body Plant 40 (Detroit Central Pcts)
MIP605356746

INSPECTION FORM A 1/28/83

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[X]	storage in containers not active	I
S02	[ ]	storage in tanks	J
T01	[ ]	treatment in tanks	J
S04	[ ]	storage in surface impoundment	K,F
T02	[ ]	treatment in surface impoundment	K,F
D83	[ ]	disposal in surface impoundment	K,F
S03	[ ]	storage in waste pile	L
D81	[ ]	disposal by land application	M,F
D80	[ ]	disposal in landfill	N,F
T03	[ ]	treatment by incineration	O/P
T04	[ ]	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	[ ]	small quantity	APPENDIX	GN
TRANSPORTER	[ ]		APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

NA

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

NA.

cc: Ken Burda (3)
Ken Rapske

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?				NA
b. Facility expansion?				NA
c. Change of owner or operator?				NA
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X			
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				NA
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	X			
or				
b. i. Artificial or natural barrier around facility?	X			
and				
ii. Controlled entry?	X			
c. Danger sign(s) at entrance?			X	
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?	X			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	X			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				NA
ii. safety and emergency equipment?	X			security
iii. security devices?	X			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	X			security and environmental
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	X			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	X			
d. Are areas subject to spills inspected daily when in use?	X			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	X			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	X			
ii. the name of the inspector?	X			
iii. a notation of the observations made?	X			
iv. the date and nature of any repairs or remedial actions?			X	
5. Do personnel training records include: 265.16				
a. Job titles?	X			
b. Job descriptions?	X			

	YES	NO	NI	Remarks
c. Description of training?	X			
d. Records of training?	X			
e. Did facility personnel receive the required training by 5-19-81?			X	
f. Do new personnel receive required training within six months?			X	
g. Do personnel training records indicate that personnel have taken part in an annual review of initital training?	X			

6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17

	YES	NO	NI	Remarks
a. Special handling?				No wastes stored
b. No smoking signs?				Provisions have been made to comply if wastes are ever stored.
c. Separation and protection from ignition sources?				

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

	YES	NO	NI	Remarks
1. Maintenance and Operation of Facility: 265.31				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?			X	
2. If required, does the facility have the following equipment: 265.32				
a. Internal communications or alarm systems?	X			
b. Telephone or 2-way radios at the scene of operations?	X			
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control:

_____

_____

	YES	NO	NI	Remarks
3. Testing and Maintenance of Emergency Equipment: 265.33				
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
b. Is emergency equipment maintained in operable condition?	X			
4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	X			
5. Is there adequate aisle space for unobstructed movement?			X	
6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	X			

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			posted
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	X			

	YES	NO	NI	Remarks
3. Emergency Coordinator 265.55				
a. Is the facility Emergency Coordinator identified?	X			
b. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
4. Emergency Procedures 265.56				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				NA

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)				
b. Are records of past shipments retained for 3 years?				
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72				
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				NA
a. Does the owner or operator maintain an operating record as required in 265.73?	X			No waste in storage - are keeping records on small quantity waste that is generated.
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	X			NA.
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	X			NA
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

	YES	NO	NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				NA
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			NA
v. Reports detailing all incidents that required implementation of the Contingency Plan?				NA
vi. All closure and post closure costs as applicable?	X			NA
4. Availability of Records 265.74				
Are all facility records required under 40 CFR Part 265 available for inspection?	X			
5.**Unmanifested Waste Reports 265.76				
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?				NA
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.				

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	___	___	___	_____
If "no", Skip to number 11.				
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?	___	___	___	_____
If "yes", skip to number 12. If "no", continue				
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	___	___	___	_____
Indicate the total number of up-gradient wells.				
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	___	___	___	_____
Indicate the total number of downgradient wells.	_____			
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	___	___	___	_____

NA

Sketch the locations of the wells relative to the waste management area.

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?				
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				
a. Sample collection?				
b. Sample preservation and shipment?				
c. Analytical procedures?				
d. Chain of custody control?				
5. Does the owner or operator follow his groundwater sampling and analysis plan?				
6. Is the groundwater sampling and analysis plan maintained at the facility?				
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?				

NA

NI

	YES	NO	NI	Remarks
8. Has the owner or operator developed an outline of a comprehensive groundwater quality assesment program that is capable of determining: 265.93				
a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?				
b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?				
c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?				
*9. Has the owner or operator performed a statistical analysis of his groundwater monitoring data as required in 265.93(b)?			X	
*10. Was there a statistically significant increase (or pH decrease) detected in any well?			X	
a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?			X	
Skip to number 14				
11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?				
a. Is the waiver demonstration maintained at the facility?				
b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?				

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

NA

	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	___	___	___	_____
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	___	___	___	_____

Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.

13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	___	___	___	_____
14. Does the owner or operator submit reports and maintain records as required in 265.94?	___	___	___	_____

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	✓			
b. Does the plan identify:				
i. maximum extent unclosed during facility life?				NA
ii. maximum hazardous waste inventory?	X			
iv. estimated year of closure?				NA
v. schedule of closure activities?	X			
c. Has closure begun?		X		
*2. Post-Closure 265.118 NA				
a. Is the post-closure plan available for inspection?				
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?				
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable				
BB. facility monitoring equipment				
iii. name, address, and phone number of person or office to contact during post-closure care period?				
c. Has the post-closure period begun?				
d. Is the written post-closure cost estimate available? 265.144				

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES	NO	NI	Remarks
1.	Are containers in good condition? 265.171			X	No waste in storage
2.	Are containers compatible with waste in them? 265.172				
3.	Are containers managed to prevent leaks? 265.173				
4.	Are containers stored closed?				
5.	Are containers inspected weekly for leaks and defects.				
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176				
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177				
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				

NA

Section J - TANKS (Part 265, Subpart J)

	YES	NO	NI	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	___	___	___	_____
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	___	___	___	_____
3. Do continuous feed systems have a waste-feed cutoff?	___	___	___	_____
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193		___	___	___ _____
5. Are required daily and weekly inspections done? 265.194		___	___	___ _____
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)		___	___	___ _____
7. Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)		___	___	___ _____

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____gallons

Tank diameter: _____feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

NA

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	___	___	___	_____
2. Do earthen dikes have protective covers? 265.223	___	___	___	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	___	___	___	_____
4. Is the freeboard level inspected at least daily? 265.226	___	___	___	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	___	___	___	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	___	___	___	_____
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	___	___	___	_____

NA

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	___	___	___	_____
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256	___	___	___	_____
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257	___	___	___	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	___	___	___	_____

NA

Section M - LAND TREATMENT (Part 265, Subpart M)

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation? 265.272	___	___	___	_____
2. Are run-off and run-on diverted from the facility or collected				
3. Is waste analyzed according to 265.273?	___	___	___	_____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	___	___	___	_____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278	___	___	___	_____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?	___	___	___	_____
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279	___	___	___	_____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281	___	___	___	_____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282	___	___	___	_____

NP

Section N - LANDFILLS (Part 265, Subpart N)

	YES	NO	NI	Remarks
1. General Operating Requirements 265.302 Does the facility provide the following:				
a. Diversion of run-on away from active portions of the fill?	___	___	___	_____
b. Collection of run-off from active portions of the fill?	___	___	___	_____
c. Is collected run off treated?	___	___	___	_____
d. Control of wind dispersal of hazardous waste?	___	___	___	_____
2. Surveying and Recordkeeping 265.309 Does the Operating Record Include:				
a. A map showing the exact location and dimensions of each cell?	___	___	___	_____
b. The contents of each cell and the location of each hazardous waste type withing each cell?	___	___	___	_____
3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312	___	___	___	_____
4. Special Requirements for Incompatible Wastes. 265.313 Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)	___	___	___	_____

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

NA

	YES	NO	NI	Remarks
5. Special requirements for liquid waste 265.314				
a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.				
i. Does the landfill have a chemically and physically resistant liner system?	___	___	___	_____
ii. Does the landfill have a functional leachate collection system?	___	___	___	_____
iii. Are free liquids stabilized prior to or immediately after placement in the landfill?	___	___	___	_____
b. Have containers holding free liquids been placed in landfill since March 22, 1982?	___	___	___	_____
6. Special requirements for Containers 265.315 Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	___	___	___	_____

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1. Determination of Steady State

I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): _____

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks

2. Waste Analysis I 265.345 T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value				
Halogen content				
Sulfur content				

ii. Has documented or written data been substituted for analysis of either:

Lead?				
Mercury:				

NA

b. List other paramters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. Monitoring and Inspections I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
b. Is steady state maintained or corrections attempted?	___	___	___	_____
c. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
d. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____

**Specify in Remarks for what period of time this was checked.

g. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____
4. Open Burning T 265.382 (open burning does not apply to incineration)				
a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned).	___	___	___	_____

NA

	YES	NO	NI	Remarks
ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

NA

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	___	___	___	_____
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	___	___	___	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Appendix GN

Small quantity generator - not required to manifest. Have been manifesting under Act 136

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	+			Act 136
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. _____			NI	
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?				
b. Name, mailing address, telephone number, and EPA ID number of Generator				
c. Name and EPA ID Number of Transporter(s)?				
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?				
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
f. The total quantity of waste(s) and the type and number of containers loaded?				
g. Required certification?				
h. Required signatures?				

(4) Reportable exceptions 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. NA

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. NA

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30			X	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32				
3. If required, are placards available to transporters of hazardous waste? 262.33				

4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☒ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision

will be if store

	YES	NO	NI	Remarks
a. Is each container clearly marked with the start of accumulation date?				
b. Have more than 90 days elapsed since the date inspected in (a)?				
c. Do wastes remain in accumulation tanks for more than 90 days?				
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?				

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	X			NA

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

	YES	NO	NI	Remarks
1. Has the installation imported or exported Hazardous Waste? 262.50		X		NA

(If answered Yes, complete the following as applicable.)

a. Exporting Hazardous waste; has a generator:

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	___	___	___	_____
ii. Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	___	___	___	_____
iii. Met the Manifest requirements?	___	___	___	_____
b. Importing Hazardous Waste; has the generator met the manifest requirements?	___	___	___	_____

UA

Appendix TR

	YES	NO	NI	Remarks
Section A: SCOPE:				
1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	___	___	___	_____
2. Does the transporter transport hazardous waste into the U.S. from abroad?	___	___	___	_____
3. Does the transporter transport hazardous waste out from the U.S.?	___	___	___	_____
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	_____
Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)				
1. Are copies of completed manifests available for review and retained for three years. 263.22	___	___	___	_____
2. Estimate the number of manifests for shipments completed during the part 6 months.	_____			
3. Examine a representative number of manifests. Indicate number examined.	_____			
4. Did transporter properly sign and date the manifests examined?	___	___	___	_____
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21	___	___	___	_____
If (5) is "no," skip 6 and 7.	___	___	___	_____
6. Do any manifests indicate shipments delivered to other than an alternate facility?	___	___	___	_____
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	___	___	___	_____

MIT270010077 - Plant 21 - #522 (TSD, G.T)
MIT270010049 - Plant 37 - #537
MID005356746 - Plant 40 - #536

JES 9/13/82 Sue EPA. 52.11

RECEIVED June 25, 1982

AUG 18 1982

ACT 61

RECEIVED

JUL 6 1982

WATER QUALITY DIV.
DIST. I

Mr. Roy E. Schrameck
District Engineer
Water Quality Division
Michigan Department of Natural Resources
9311 Groh Road
Grosse Isle, Michigan 48138

Dear Mr. Schrameck:

In response to your letters outlining the results of RCRA inspections conducted on March 24, 1982 at Fisher Body - Plants 21, 37 & 40 we submit the following information to address each item detailed in those letters.

Plants 21, 37 & 40

1. The attached waste analysis plan outlines the procedure used to determine if a waste generated at Plant 21, 37 & 40 is a hazardous waste. As storage facilities, the waste analysis procedure provides the necessary waste characteristics required to store the wastes in accordance with part 265 of 40 CFR. Attached are examples of waste analysis.

2. Personnel training per RCRA requirements is conducted on a routine basis. Additionally, any new personnel involved in hazardous waste management receive instruction per the attached personnel training format.

3&4. The contigency plan has been sent to the following authorities:

Capt. Bogan Chief Chapman Detroit Fire Dept. Fire Marshall Div. 250 W. Larned St. Detroit, MI 48226	Mr. B. Decoster Fire & Safety Ford Hospital 2799 W. Grand Blvd. Detroit, MI 48202	Cmdr. McKane 13th Precinct Detroit Police Dept. 4747 Woodward Detroit, MI 48230

5. All hazardous wastes shipped from Plants 37 or 40 will be manifested.

WASTE ANALYSIS PLAN

Known Hazardous Wastes -

The types of waste in this category are identified as hazardous based upon the following:

1. The waste contain materials that are listed in 40 CFR Part 261, Subpart D, or

2. The waste contains materials that have ignitability, corrosivity, reactivity, or EP toxicity characteristics as defined in 40 CFR Part 261, Subpart C.

The wastes are labeled hazardous by applying knowledge of the materials and processes that produce the waste (40 CFR Part 262.11 (c) (2)).

Wastes Requiring Testing

The types of waste in this category must be tested for those characteristics it is suspected of having, which include:

1. Ignitability
2. Corrosivity
3. Reactivity
4. EP Toxicity

The testing shall be done at a minimum of once per year or whenever a significant process change occurs. The sampling shall conform to 40 CFR Part 261 Appendix I requirements. The analytical methods shall conform to 40 CFR Part 261 Appendix II and Appendix III requirements.

Shipments of waste received at Plant 21 from Plants 37 & 40 are inspected to ensure that their identity matches the accompanying waste manifest.

6. Plants 21, 37, and 40 as delineated in their RCRA Part A application are storage facilities only, not treatment or disposal. Records have been maintained of each waste received at Plant 21. A drum storage inventory system for Plant 21 has been initiated to replace the previous record keeping procedure. The form (see attachment) is used to log all drums stored on the pad, including their location, contents, and date of receipt.

The above responses outline the documentation and actions taken at Plants 21, 37 and 40 to address the items in the RCRA inspection letters. If you have any questions, or need further information please feel free to contact Mr. Ken Rapske of my office at (313) 556-1156.

Sincerely,

J. A. ZAMMIT
PLANT ENGINEER

cc: C. Pearson

PERSONNEL TRAINING

Personnel training is given to those persons who are involved with the handling and disposition of hazardous waste material. Training consists of one (1) to two (2) hours as needed to cover the following topics:

1. Introduction to RCRA.
2. Responsibilities under RCRA.
3. Handling of hazardous waste - General.
4. Handling of hazardous waste - Detroit Central Plants.
5. Proper labelling.
6. Proper manifesting.
7. Transporting hazardous waste.
8. Contingency plan (PIPP including emergency procedures)
9. Update.

Updating of plant personnel will be on a continuous basis as regulations and operations change.

DRUM STORAGE INVENTORY

DRUM	DATE	DESCRIPTION
1		
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DRUM	DATE	DESCRIPTION
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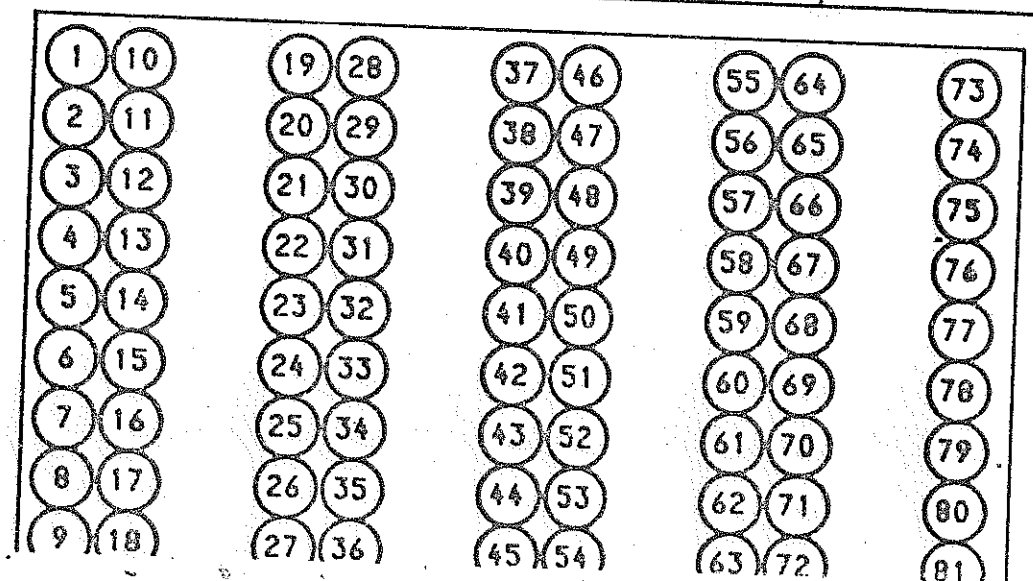

DRUM STORAGE INVENTORY

DRUM	DATE	DESCRIPTION
1	5-27-82	coolant waste
2	5-27-82	Coolant waste
[illegible]	5-27-82	Paint waste
[illegible]	5-27-82	Coolant waste
5	5-27-82	Coolant waste
6	5-27-82	coolant waste
7	5-27-82	coolant waste
[illegible]	5-26-82	coolant waste
[illegible]	5-26-82	coolant waste
[illegible]	5-27-82	coolant waste
[illegible]	5-27-82	Paint waste
[illegible]	5-28-82	coolant waste
[illegible]	5-28-82	coolant waste
[illegible]	5-31-82	Paint waste
[illegible]	5-20-82	Paint waste
[illegible]	5-20-82	Paint waste
[illegible]	5-21-82	Paint waste
[illegible]	5-21-82	Paint waste
[illegible]	6-1-82	coolant waste
[illegible]	5-21-82	Paint waste
[illegible]	5-21-82	Paint waste
[illegible]	6-2-82	Paint waste
[illegible]	5-26-82	coolant waste
[illegible]	5-26-82	coolant waste
[illegible]	5-26-82	coolant waste
[illegible]	6/8/82	Paint waste
[illegible]	6/4/82	Paint waste
[illegible]	6/4/82	Paint waste
[illegible]	6/9/82	Coolant waste
[illegible]	6/9/82	Coolant waste
31	6-12-82	Petroleum oil
32	6-12-82	Petroleum oil
[illegible]	6-10-82	coolant waste
[illegible]	6-12-82	Petroleum oil
[illegible]	6-12-82	Petroleum oil
[illegible]	6-12-82	Petroleum oil
[illegible]	5-21-82	Paint waste
[illegible]	5-21-82	Paint waste

DRUM	DATE	DESCRIPTION
39	5-21-82	Paint waste
40	5-21-82	Paint waste
[illegible]	5-21-82	Paint waste
[illegible]	5-21-82	Paint waste
43	6-21-82	Paint waste
44	6-21-82	[illegible]
[illegible]	6-21-82	Paint waste
[illegible]	6-10-82	Paint waste
[illegible]	6-25-82	Paint waste
[illegible]	6-25-82	Paint waste
49	6-10-82	Paint waste
[illegible]	6-10-82	Paint waste
[illegible]	6-18-82	Paint waste
[illegible]	6-24-82	Paint waste
[illegible]	6-4-82	Paint waste
[illegible]	6-28-82	Paint waste
[illegible]	6-29-82	Oleum waste
56	6-29-82	Oleum waste
57	6-29-82	1,1,1 Trichloroethane
[illegible]	6-25-82	Petroleum oil
59	6-25-82	Petroleum oil
60	6-29-82	Petroleum oil
61	6-21-82	Paint waste
62	4-20-82	Paint waste
63	6-2-82	Coolant waste
64	4-26-82	Paint waste
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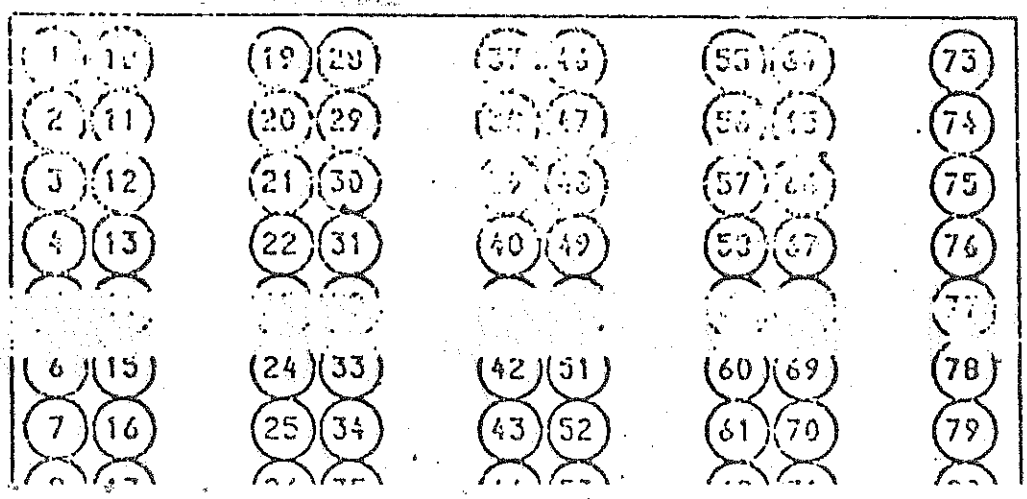

CLOW
HYDRO RESEARCH SERVICES
Water Management Division
Clow Corporation
408 Auburn Avenue
Pontiac, MI 48058
313 334-1630
313 334-4747

April 28, 1982

General Motors Corporation
Fisher Body Division
6051 Hastings - Plant 21
Detroit, MI 48211

Attn: Mr. Ken Rapske

Sample dated 4-12-82

Hydro Number: 54768

Client Identification: EPA leachate procedure on heat treating salt

Arsenic, As, mg/l	0.020
Barium, Ba, mg/l	2.8
Cadmium, Cd, mg/l	0.15
Total Chromium, Cr, mg/l	0.12
Lead, Pb, mg/l	1.5
Mercury, Hg, mg/l	<0.0005
Selenium, Se, mg/l	0.015
Silver, Ag, mg/l	0.05
Copper, Cu, mg/l	19
Zinc, Zn, mg/l	11
Total Cyanide, CN, mg/l	990

Note: 103.8 grams of sample were leached into 1661 mls of deionized water and brought to a final volume of 2076 mls. Final pH after the addition of 415 mls of 0.5 N acetic acid was 9.2.

Linda Deans
General Laboratory Manager

CLOW
HYDRO RESEARCH SERVICES
Water Management Division
Clow Corporation
408 Auburn Avenue
Pontiac, MI 48058
313 334-1630
313 334-4747

5-25-82

General Motors Corporation
Fisher Body Division
6051 Hastings Plant 21
Detroit, MI 48211
Attn: Mr. Ken Rapske

Sample Received: 5-6-82

Hydro Number:	55317
Client I.D.	Waste Oil
Flash Pt °F.	>200
pH (corrosivity)	5.0
Density, g/ml	0.93
% Solids	0.2
% Oil	60
% H_2O	40
Arsenic, As, mg/kg	0.12
Barium, Ba, mg/kg	22
Cadmium, Cd, mg/kg	1.2
Total Chromium, Cr, mg/kg	2.6
Pb, Lead, mg/kg	23
Mercury, Hg, mg/kg	<0.1
Selenium, Se, mg/kg	<0.1
Silver, Ag, mg/kg	<0.9
Copper, Cu, mg/kg	150
Zinc, Zn, mg/kg	150
Total Cyanide, CN, mg/kg	<0.3

Linda Deans
General Laboratory Manager

EPA

(Plant 40)

MID005356746

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
JACOB A. HOEFER
CARL T. JOHNSON
E.M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

WILLIAM G. MILLIKEN, Governor

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director
Water Quality Division
9311 Groh Road
Grosse Ile, Michigan 48138

May 21, 1982

RECEIVED

JUN 8 1982

WATER QUALITY DIV.
DIST. I

Certified Mail

Mr. John Zammit
Plant Engineer
GMC Fisher Body Detroit Central Plant 21
6051 Hastings
Detroit, Michigan 48211

Re: Plant 40 - Compliance with Resource Conservation and Recovery Act

Dear Mr. Zammit:

On March 25, 1982, Susan Norton of our office conducted an inspection of the above referenced plant to determine compliance with the requirements of subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of the visit, she determined that Plant 40 is in violation of the following requirements:

(1) A detailed physical and chemical analysis of the facility's hazardous waste was not available for inspection, as required by 40 CFR 265.13(a); nor was a waste analysis plan on file, as required by 40 CFR 265.13(b).

(2) Personnel training records do not include a description of training, nor a record that facility personnel have received the required training by May 19, 1981. This is in violation of 40 CFR 265.16(d).

(3) The Contingency Plan does not indicate arrangements agreed to by local police and fire departments, and hospitals, to coordinate emergency services, as required by 40 CFR 265.37. Where local authorities decline to enter such an arrangement, refusal must be documented in the operating record.

(4) Copies of the Contingency Plan are not available at local emergency organizations as required by 40 CFR 265.53.

MICHIGAN
THE GREAT LAKE STATE
R1026 1/79

(5) Plant 40 is a generator as well as a storage facility. Hazardous waste generated at Plant 40 is not manifested as required by 40 CFR 262.20. As a result, 40 CFR 262.21, 262.22 and 262.23 have also been violated. These concern information required on the manifest, number of copies and use of the manifest by generator and transporter.

(6) By extension of the above Item, the facility is in violation of 40 CFR 265.71(a)5, which requires that manifests, annual reports, exception reports, and all test reaults and analyses be retained for at least three years.

(7) Because the owner/operator of Plant 40, GMC Fisher Body Detroit Central Plant, is transporting Plant 40's hazardous waste, the owner/operator is in violation of 40 CFR 263.22(a), which requires the transporter to have copies of completed manifests available for reveiw and retained for three years.

We request that you respond to this office by letter no later than June 30, 1982, providing documentation regarding those actions taken to correct these violations. You may find it helpful to refer to Item 5 of our letter to you of May 14, concerning Plant 21. If you have any questions please do not hesitate to contact this office at (313) 675-0860. Our appreciation is extended to your company's staff for their cooperation and assistance during the inspection.

Yours truly,

WATER QUALITY DIVISION

Roy E. Schrameck

Roy E. Schrameck, P.E.
District Engineer

Susan Norton

By: Susan Norton
Water Quality Specialist

RES:SN/sc

cc: Alan Howard, OHWM (2)
Kenneth Rapske

5336 EPA

STATE IDENTIFICATION NUMBER
(If Applicable)

MIO 005 356 746
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

RECEIVED
JUN 08 1982
ACT 61

I. General Information:

(A) Facility Name: GMC FISHER BODY DETROIT CENTRAL PLANT 40

(b) Street: 1500 E. MILWAUKEE Ferry

(C) City: DETROIT (D) State: MICH. (E) Zip Code: 48211

(F) Phone: 313-556-1156 (G) County: WAYNE

(H) Operator: GMC FISHER BODY DETROIT CENTRAL PLANT 21

(I) Street: 6051 HASTINGS

(J) City: DETROIT (K) State: MICHIGAN (L) Zip Code 48211

(M) Phone: 313-556-1156 (N) County: WAYNE

(O) Owner: SAME AS OPERATOR

(P) Street:

(Q) City: (R) State: (S) Zip Code:

(T) Phone: (U) County:

(V) Date of Inspection: MARCH 25, 1982 (W) Time of Inspection (From) 10:30 A.M. (To) 11:30 A.M.

(X) Weather Conditions: CA. 45°F, RAINING

Rev. 1-26-81/J.B.

MID005356746

(Y) Person(s) Interviewed

Person(s) Interviewed	Title	Telephone
KENNETH RAPSKE	PLANT ENGINEER	313-556-1156
MIKE CRAGEL	GENERAL SUPERVISOR	313-556-1258
ROBERT SCHMANDT	SUPERVISOR	313-556-1258

(Z) Inspection Participants

Inspection Participants	Agency/Title	Telephone
SUSAN NORTON	MICHIGAN DEPT. OF NATURAL RESOURCES WATER QUALITY DIVISION	313-695-0860

(AA) Preparer Information

Name	Agency/Title	Telephone
SUSAN NORTON	AS ABOVE	AS ABOVE

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
1. Containers (I)
2. Tanks (J)
3. Surface Impoundments (K)
4. Waste Piles (L)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatment (O and P)

___E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

MID005356746

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark (N/A = NOT APPLICABLE)
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source? 265.12(a)				N/A
2. Facility expansion? 122.23(b)2				N/A
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)	X (BUT SEE REMARKS, LAST PAGE)			BASED ON RAW MATERIALS
2. Does the owner or operator have detailed waste analysis plan on file at the facility? 265.13(b)		X		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)		X		
(C) Security - Do security measures include: (if applicable) 265.14				
1. 24-Hour surveillance? 265.14(b)1	X			
2. Artificial or natural barrier around facility? 265.14(b)2	X			
3. Controlled entry? 265.14(b)2ii	X			
4. Danger sign(s) at entrance? 265.14(c)	X			
(D) Do Owner or Operator Inspections Include: 265.15				
1. Records of malfunctions? 265.15(a)1	X			
2. Records of operator error? 265.15(a)1	X			
3. Records of discharges? 265.15(a)1	X			

*Not Inspected

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule: 265.15(a)4	X			
5. Safety, emergency equipment? 265.15(b)1	X			
6. Security devices? 265.15(b)1	X			
7. Operating and structural devices? 265.15(b)1	X			
8. Inspection log? 265.15(d)	X			
(E) Do personnel training records include: (Effective 5/19/81) 265.16(d)				
1. Job Titles?	X			
2. Job Descriptions?	X			
3. Description of Training?		X		
4. Records of Training?	X			
5. Have facility personnel received required training by 5-19-81?		X		
6. Do new personnel receive required training within six months?				NOT APPLICABLE — NO NEW HIRES
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				NO INCOMPATIBLE WASTES FILED FOR ON PART A; COMPANY USES METHYL ETHYL KETONE PEROXIDE, A REACTIVE MATERIAL, BUT DOES NOT GENERATE ANY WASTE ~~WITH~~ FROM IT. SEE REMARKS, LAST PAGE
1. Special handling?	X			
2. No smoking signs?	X			
3. Separation and protection from ignition sources?	X			

*Not Inspected

MID005356746

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	YES	NO	NI	
(A) Maintenance and Operation of Facility:				
1. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31		X		
(b) If required, does the Facility have the Following Equipment: 265.32				
1. Internal communications or alarm systems? 265.32 (a)	X			
2. Telephone or 2-way Radios at the scene of operations? 265.32 (b)	X			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? 265.32 (c)	X			

Indicate the volume of water and/or foam available for fire control: 265.32 (d)

Units: NOT INSPECTED

(C) Testing and Maintenance of Emergency Equipment: 265.33 RECORDKEEPING REQUIRED UNDER 265.15(b)1				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	X			
2. Is Emergency Equipment Maintained in Operable Conditions?	X			
(D) Has Owner or Operator Provided Immediate Access to Internal Alarms? (if needed) 265.34	X			

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement? X

265.35

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed to by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		X		
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators? 265.52 (d)	X			PRIMARY EMERGENCY COORDINATOR HAS A COMPLETE LISTING; NIS ALTERNATES HAVE ONLY THEIR WORK PHONES LISTED
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? 265.52(e)	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?) 265.52(f)	X			

*Not Inspected

MID005356746

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(b) Are copies of the Contingency Plan Available at Site and local Emergency Organizations? 265.53				NO FOR LOCAL EMERGENCY ORGANIZATIONS; COPY FOR SITE (PLT 40) IS KEPT AT PLANT 21.
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified? 265.55	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				NOT APPLICABLE

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

THIS SECTION NOT APPLICABLE - PLANT 40 FACILITY DOES NOT RECEIVE HAZARDOUS WASTE

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?				N/A
2. Are records of past shipments retained for 3 years 265.71(5)				N/A
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies? 265.72				N/A

*Not Inspected

MID005356746

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

(C) Operating Record
265.73

1. Does the owner or operator maintain an operating record as required in 265.73? ✓ ___ ___ _____

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I? ✓ ___ ___ _____

c. The location and quantity of each hazardous waste within the facility? ✓ ___ ___ _____

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers if waste was accompanied by a manifest.) ___ ___ ___ NOT APPLICABLE

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

f. Reports detailing all incidents that required implementation of the contingency plan? ___ ___ ___ NOT APPLICABLE

g. All closure and past closure costs as applicable? (Effective 5-19-81) ___ ___ ___ NOT APPLICABLE

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

MID 005 356 746

VIII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981? 265.112(a)	X			
2. Has this plan been submitted to the Regional Administrator 265.112(c)		X		NOT APPLICABLE
3. Has Closure begun? 265.112(c)		X		
4. Is closure estimate available by May 19, 1981? 265.142	X			
(B) Post Closure Care and Use of Property				
Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)? 265.117				NOT APPLICABLE

IX. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: GMC FISHER BODY DETROIT CENTRAL PLANT #40 Date of Inspection: MAR. 25, 1982

NOT APPLICABLE — NO WASTE WAS IN STORAGE ON PREMISES DURING VISIT

	Yes	No	NI*	Remarks
1. Are containers in good condition? 265.171				N/A
2. Are containers compatible with waste in them? 265.172				N/A
3. Are containers stored closed? 265.173(a)				N/A
4. Are containers managed to prevent leaks? 265.173(b)				N/A
5. Are containers inspected weekly for leaks and defects? 265.174				N/A
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? 265.176	X			Indicate if waste is: ☐ Ignitable, ☐ Reactive — ONLY APPLIED FOR; NONE APPEAR TO HAVE BEEN GENERATED.

*Not Inspected

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.177(a)				NOT APPLICABLE
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance? 265.177(c)				NOT APPLICABLE

J
TANKS

Facility Name: GMC FISHER BODY PLANT #40 Date of Inspection: MAR. 25, 1982

THIS SECTION NOT APPLICABLE

	Yes	No	NI*	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192(b)				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement structures? 265.192(c)				
3. Do continuous feed systems have a waste-feed cutoff? 265.192(d)				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193(a)				
5. Are required daily and weekly inspections done? 265.194				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.198, 265.17				Indicate if waste is: ☐ Ignitable ☐ Reactive
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.199				

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

   Tank capacity: _____ gallons

   Tank diameter: _____ feet

   Distance of tank from property line _____ feet

   (See table 2 - 1 through 2 - 6 of NRPA's "Flammable and Combustible Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: NOT APPLICABLE Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222				
2. Do earthen dikes have protective covers? 265.223				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225(a)				
4. Is the freeboard level inspected at least daily? 265.226(a)1				
5. Are the dikes inspected weekly for evidence of leaks or deterioration? 265.226(a)2				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229(a)1				
7. Are imcompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230				

MID 005 356 746

L

WASTE PILES

Facility Name: NOT APPLICABLE Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind? 265.251	___	___	___	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252	___	___	___	_____
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.) 265.253	___	___	___	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256(a)1	___	___	___	_____
5. Are piles of reactive or ignitable waste protected? 265.256(a)2	___	___	___	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257(a)	___	___	___	_____
7. Are piles of imcompatible waste protected by barriers or distance from other waste? 265.257(b)	___	___	___	_____

Indicate if waste is: ☐ Ignitable, ☐ Reactive

*Not Inspected

MIO 005356746

M

LAND TREATMENT

NOT APPLICABLE

FAcility Name: _____ Date of Inspection: _____

1. Is hazardous waste treated capable of biological or chemical degradation?
   265.272(a)
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?
   265.272(b&c)
3. Is waste analyzed according to 265.273?
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?
   265.278(a)
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?
7. Are records kept regarding application dates, ~~and~~ rates, quantities, and locations of all hazardous waste placed in the facility?
   265.279
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes?
   265.281
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies)
   265.282

Indicate if waste is: ☐ Ignitable ☐ Reactive

*Not Inspected

MID005356746

N
LANDFILLS
NOT APPLICABLE

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill? 265.302(a)	___	___	___	_____
**2. Collection of run-off from active portions of the fill? 265.302(b)	___	___	___	_____
**3. Is collected run off treated? 265.302(b)				_____
4. Control of wind disposal of hazardous waste? 265.302(d)	___	___	___	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell? 265.309(a)	___	___	___	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell? 265.309(b)	___	___	___	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81? 265.112(a)	___	___	___	_____
2. Has this plan been submitted to the Regional Administrator? 265.112(c)	___	___	___	_____
3. Has Closure begun? 265.112(c)	___	___	___	_____
4. Is Closure cost estimate available by 5-19-81? 265.142(a)				
(D) Special requirements ~~fro~~ for ignitable or reactive waste				
Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? 265.317	___	___	___	_____

MID005356746

NOT APPLICABLE

	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements) If not, the provisions of 40 CFR 265.17(b) apply.				
(E) Special requirements for Incompatible Wastes. Does the owner or ooperator dispose of incompatible wastes in separate cells? 265.313				
If not, the provisions of 40 CFR 265.17(b) apply.				
(F) Special requirements for liquid waste (effective 11-19-81) 1. Are bulk or non-containerized liquids placed in the landfill? 265.314(a)				
2. Does the landfill have a chemically and physically resistant liner system? 265.314(a)1				
3. Does the landfill have a functional leachate collection system? 265.314(a)1				
4. Are fee liquids stabilized prior to or immediately after placement in the landfill? 265.314(a)2				
(G) Special requirements for Containers (effective 11-19-81) Are empty containers crushed flat, shredded, or similarly reduced in volume before being, buried beneath the surface of the landfill? 265.315(a)				

*Not Inspected

MID 005356746

O and P
INCINERATION and THERMAL TREATMENT

NOT APPLICABLE

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment:): _____

B. Components and steady state condition: I 265.343 TN 265.373

**** Was this component at SS prior to adding waste?

	Component	Yes	No	NI*	Remarks
1.					
2.					
3.					
4.					
5.					

II. Waste Analysis

265.13

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:	Yes	No	NI*	Remarks
I 265.345 TN 265.375				
a. Heating value				
b. Halogen content				
c. Sulfur content				

*Not Inspected

MID 005356746

	Yes	No	NI*	Remarks
NOT APPLICABLE				
2. Documented, written data may be substituted for analysis for these. Are either present for: I 265.345 TN 265.375				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

NOT APPLICABLE

	Yes	No	NI*	Remarks
A. Combustion/emission control instruments monitored at least every 15 minutes I 265.345(a)1 TN 265.377(a)1	___	___	___	_____
B. Steady state maintained or corrections attempted? I 265.347(a)1 TN 265.377(a)2	___	___	___	_____
C. Stack Plume observed at least hourly for normal color and opacity? I 265.347(a)2 TN 265.377(a)2	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?** I 265.347(a)2 TN 265.377(a)2	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?** I 265.347(a)2 TN 265.377(a)2	___	___	___	_____
F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions? I 265.347(a)3 TN 265.377(a)3	___	___	___	_____
G. Emergency shutdown controls, system alarms checked daily for proper operation? I 265.347(a)3 TN 265.377(a)3	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

NOT APPLICABLE

ID 005356746

IV. Open Burning

Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.) 265.382	___	___	___	_____
2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below) 265.382	___	___	___	_____

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1.250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q
CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

NOT APPLICABLE

Facility Name: _____

Date of Inspection: _____

	yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	___	___	___	_____
2. Is a continously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	___	___	___	_____

*Not Inspected

MID 005356746

NOT APPLICABLE

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?				
4. Are inspection procedures followed according to 265.403?				
5. Are the special requirements fulfilled for ignitable or reactive wastes?				
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)				

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutraliz wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

PLANT 40 SHOULD BE CONSIDERED A GENERATOR AS WELL AS A STORAGE FACILITY. HAZARDOUS WASTE IS REMOVED TO GMC PLANT 21 BY STAFF FOR STORAGE MATERIAL HAS NOT BEEN MANIFESTED. COMPANY HAS BEEN NOTIFIED THAT THIS IS A DEFICIENCY

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review? 262.23(a)3		X		
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number? 262.21(a)1		X		
2. Name, mailing address, telephone number, and EPA ID Number of Generator 262.21(a)2		X		

MID 005356746

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)? 262.21(a)3		X		
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility? 262.21(a)4		X		
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)? 262.21(a)5 DOT INFORMATION IN CFR 49 172.101, 172.202, & 172.203		X		
6. The total quantity of waste(s) and the type and number of containers loaded? 262.21(a)6		X		
7. Required Certification? 262.21(b)		X		
8. Required Signatures? 262.23(a)1		X		
(C) Does the Owner or Operator Submit Exception Reports when Needed? 262.42		X		

2. PRE-TRANSPORT REQUIREMENTS

NO HAZARDOUS WASTE WAS AVAILABLE FOR INSPECTION DURING VISIT

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off site) 262.30, 49 CFR PARTS 173, 178, & 179			X	
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials? (Required to movement of hazardous waste off site) 262.31 49 CFR PART 172			X	
(C) If required, are placards available to transfer? 262.33 49 CFR PART 172 SUBPART F			X	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

NO CONTAINERS AVAILABLE FOR INSPECTION

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date? 262.34 (a) 3			X	
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days 262.34 (a) 1 IF NO, THE FACILITY MUST BE A STORAGE OR DISPOSAL FACILITY 262.34 (b)	X			ALTHOUGH COMPANY WAS FILED AS A STORER, THEY MAKE A RULE TO REMOVE ANY ACCUMULATION BEFORE 90 DAYS
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	X			DISTANCE DETERMINED FROM MAP ATTACHED TO PART A
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank? 265.192(b)				N/A
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures? 265.192(c)				N/A
c. Do continous feed systems have a waste-feed cutoff? 265.192(d)				N/A
d. Are required daily and weekly inspections done? 265.194				N/A
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements? 265.198, 265.17				N/A
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) 265.199				N/A

*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years? 265.71(a)5		X		See IX, p19
(B) Has the Generator submitted Annual Reports and Exception Reports as required?				N/A

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
(A) Has the installation imported or exported Hazardous Waste? 262.50		X		

(If A was answered Yes, then complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing? 262.50(b)1				N/A
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? 262.50(b)2				N/A
c. Met the Manifest requirements? 262.50(b)3				N/A
2. Importing Hazardous Waste, has the generator: 262.50(d)				
a. Met the manifest requirements?				N/A

*Not Inspected

MID 005356746

X

TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years? 263.22(a)		X		SEE II, p 19

II. INTERNATIOINAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.? 263.20(F)1				N/A
B. Are signed completed manifest(s) on file? 263.22(a) & 263.20(F)2				N/A

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad 263.10(c)1		X		
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container? 263.10(c)2		X		

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

263.10(c)

*Not Inspected

MID005356746

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

PLANT 40 HOUSES SHOPS FOR CONSTRUCTION OF SPECIAL TOOLS & DIES, DIE SETS, JIGS AND FIXTURES, INCLUDING PROTOTYPES AND MODELS.

PLANT 40, ALTHOUGH A SEPARATE AND NON-CONTIGUOUS FACILITY, IS CONSIDERED A DEPARTMENT OF GMC FISHER BODY PLANT 21 SEVERAL BLOCKS AWAY. BECAUSE OF THIS IN-GRAINED CONVENTION, STAFF HAS NOT CLEARLY RECOGNIZED THAT UNDER RCRA, PLANT 40 MUST BE CONSIDERED A DISTINCT FACILITY. THIS PARTIAL RECOGNITION HAS RESULTED IN PARTIAL COMPLIANCE. STAFF HAS NOT MANIFESTED HAZARDOUS WASTE FROM PLANT 40 TO PLANT 21. COMPANY HAS BEEN ADVISED OF THIS VIOLATION VERBALLY – THIS WILL BE CONFIRMED BY LETTER.

FURTHER, ALL DOCUMENTATION FOR PLANT 40 (CONTINGENCY PLAN, OPERATING RECORD, CLOSURE PLAN, PERSONNEL TRAINING RECORDS) IS KEPT WITH PLANT 21 DOCUMENTATION, AND IN SOME CASES PLANT 21 DOCUMENTATION IS USED TO COVER PLANT 40 (I.E, CONTINGENCY PLAN).

LASTLY, THE SITUATION HAS BEEN COMPLICATED BY THE WAY STAFF CHOSE TO FILL OUT THE DESCRIPTION OF HAZARDOUS WASTES ON THEIR PART A. RATHER THAN ANALYZING PRECISELY WHAT WASTE HAS BEEN ANNUALLY GENERATED, THEY LISTED THE ANNUAL USAGE OF RAW MATERIALS THAT WOULD BE CLASSED AS HAZARDOUS WASTES IF THEY WERE WASTES. THE ACTUAL AMOUNT AND TYPE OF WASTE SEEMS (BASED ON INTERVIEWS) TO BE 3-4 55-GALLON DRUMS PER 3 MONTHS OF MIXED WASTE LACQUER THINNER, MINERAL SPIRITS, AND ALCOHOL (MAINLY THE LAST ITEM, IN FACT). COMPANY PRACTICE IS FOR STAFF TO REMOVE THESE TO PLANT 21 STORAGE AREA BEFORE 90 DAYS HAVE ELAPSED.

DEFICIENCY LETTER TO COMPANY WILL ADDRESS:

1. TRANSPORT AND MANIFESTING OF WASTE TO PLANT 21
2. LOCATION OF PLANT 40 DOCUMENTATION
3. IMPROVEMENTS IN LISTING WASTES GENERATED; FACILITY SHOULD DETERMINE WHAT WASTES ARE ACTUALLY GENERATED AND CHANGE THEIR FILING ACCORDINGLY.

D. Corrective Action

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

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PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

O. J. TRANSPORT (FORMER GMC FISHER BODY PLANT 40) DETROIT, MICHIGAN MID 005 356 746

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	009C05087
EPA Region	:	5
Site No.	:	MID 005 356 746
Date Prepared	:	August 23, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087MI09
Prepared by	:	PRC Environmental Management, Inc. (Steve Tsadwa)
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Telephone No.	:	(312) 856-8700
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Telephone No.	:	(312) 886-4448

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B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

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RELEASED
DATE 1/18/01
RIN #
INITIALS sh

ENFORCEMENT CONFIDENTIAL

EXECUTIVE SUMMARY

PRC Environmental Management, Inc., performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMUs) at the former General Motors Corporation (GMC) Fisher Body Plant 40 facility (MID 005 356 746) in Detroit, Michigan. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of Resource Conservation and Recovery Act (RCRA) facilities.

The facility, located at East Ferry Street, in Detroit, Michigan, was operated by GMC Fisher Body Division (GMC) between 1977 and 1984 as a manufacturing facility for the construction of special dies and tools, die sets, jigs, and fixtures including prototypes and models. During this time, the facility generated spent solvents, plating wastes, and ignitable and corrosive wastes. These wastes were transported to another GMC Fisher Division Plant -- Plant 21. At the end of 1984, GMC sold the property to O.J. Transport. O.J. Transport uses this facility for semi-trailer maintenance and storage, semi-tractor/vehicle storage, parts storage, and offices. No manufacturing is conducted at this facility.

O.J. Transport also operates a vehicle maintenance facility on Gratiot Street, approximately 2 miles from the former GMC facility. The operations and hazardous waste activities conducted at that location are not within the scope of this PA/VSI; therefore, only brief discussions of observations made by the PRC team concerning the Gratiot Street location will be presented in this report.

The PA/VSI identified the following 3 SWMUs at the East Ferry Street facility:

Solid Waste Management Units

1. Former Drum Storage Area
2. Vesco Parts Cleaner
3. Refuse Dumpster

SWMU 1 was closed in 1984 and its closure was approved. During the VSI, no release from SWMU 1 was observed. There is a low potential for release to any environmental media from this SWMU.

~~ENFORCEMENT CONFIDENTIAL~~

SWMUs 2 and 3 are currently active and no evidence of any release was found during the VSI. There have not been any documented releases from these units. There is a low potential for release to air since no improper emissions were ever observed from the SWMUs. The potential for release to soil, surface water, or groundwater is also low since these SWMUs are located indoors and on a concrete floor.

The groundwater aquifer at the site is unusable by the population for drinking water. The city of Detroit uses the Detroit River as a source of drinking water and for recreational purposes. Furthermore, the intake location is about 4 miles away from the facility. Access to the site is restricted.

No further action is recommended at this time.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI conducted at the former GMC Fisher Body Plant 40 facility at 1500 E. Ferry Street, Detroit, Michigan (MID 005 356 746).

The PA was completed on April 2, 1991. PRC gathered and reviewed information from Michigan Department of Natural Resources, Wayne County Department of Health, and from EPA Region 5 RCRA files.

The VSI was conducted on April 4, 1991. It included interviews with O.J. Transport facility representatives and a walk-through inspection of the facility. Three SWMUs were identified at the facility. The VSI is summarized and inspection photographs are included in

Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

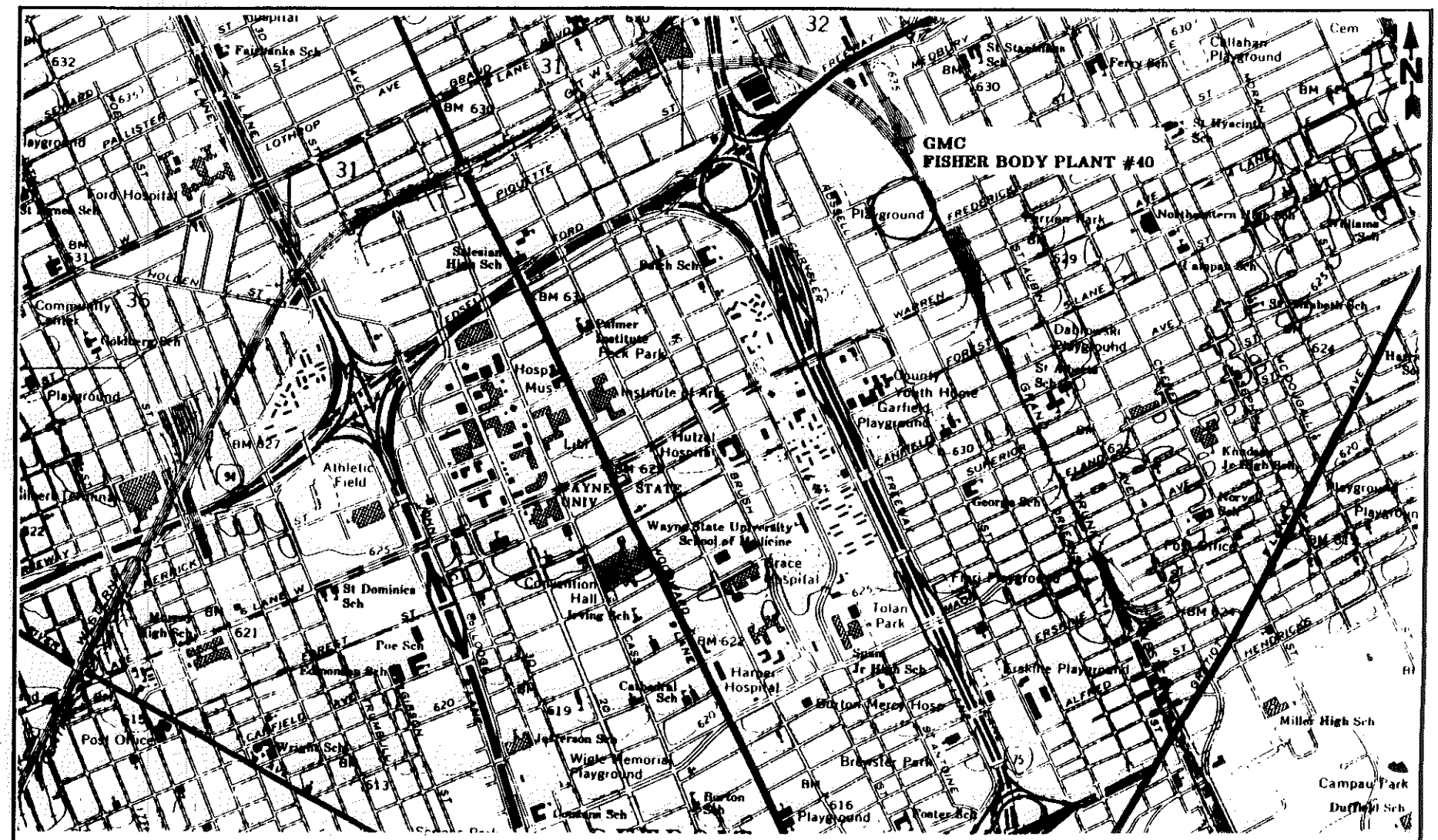
The former GMC Fisher Body Plant 40 (GMC) facility is located at 1500 E. Ferry Street in Detroit, Wayne County, Michigan (latitude: 42°22'21"; longitude: 83°03'30"). The facility consists of two buildings: a trailer-maintenance building that is constructed of brick, cinder block, and steel and is approximately 490 feet by 130 feet; and a trailer-storage building constructed of aluminum, cinder block, and steel and approximately 490 feet by 66 feet (O.J. Transport, 1991). The facility is easily accessible from E. Ferry Street; it is located in an urban area surrounded by several schools and residences that are located approximately 500 feet east of the facility. Figure 1 shows the facility location.

2.2 FACILITY OPERATIONS

Until 1984, the facility was used by GMC as a manufacturing facility for the construction of special dies and tools, die sets, jigs, and fixtures including prototypes and models. The facility was sold to O.J. Transport at the end of 1984. O.J. Transport uses the facility for semi-trailer maintenance and storage, semi-tractor/vehicle storage, parts storage, and offices. No manufacturing is conducted on these premises. The facility currently employs 19 people: eight machinists, two salespersons, two safety people, and seven dispatchers (PRC, 1991).

O.J. Transport also performs vehicle maintenance and other similar activities at its Gratiot Street facility (MID 005 768 441), approximately two miles away from the East Ferry Street location. O.J. Transport has operated its Gratiot Street facility since 1973, when they purchased it from Hertz Truck Rental (PRC 1991). O.J. Transport purchased the East Ferry Street location to expand its vehicle maintenance operations.

Under EPA's direction, this PA/VSI focused on the East Ferry Street property that O.J. Transport focused on the East Ferry Street property that O.J. Transport purchased from GMC in 1984. Further reference in this report to "the facility" will mean the former GMC facility.



SCALE 1:24000

1 1/2 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

SOURCE: USGS, 1973 & 1980

GMC FISHER BODY PLANT #40
DETROIT, MICHIGAN – ONTARIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

Table 1 lists SWMUs identified during the PA/VSI, and their regulatory status. Figure 2 indicates the location of all SWMUs.

2.3 WASTE GENERATING PROCESSES

GMC operated at the East Ferry Street location prior to selling the property to O.J. Transport. GMC's operation included construction of special dies and tools, die sets, jigs, and fixtures including prototypes and models. As a result of its operation, GMC generated spent solvents, plating wastes, and ignitable and corrosive wastes. These wastes were accumulated in 55-gallon drums and stored at the former drum storage area (SWMU 1). The drums were then transported to another GMC Fisher Body facility, Plant 21, located within 5 miles. Before GMC sold the property to O.J. Transport, it closed SWMU 1 under an EPA approved closure plan in 1984 (U.S. EPA, 1984).

O.J. Transport acquired the property in early 1985 and since then has used it as a maintenance facility for trucks and trailers. The wastes generated at this location are used oil from truck-oil changes and spent solvents (mineral spirits) from tool-cleaning activities. Used oil generated at this location is accumulated in 5-gallon buckets and is transported to the facility's underground storage tank located at Gratiot Street. Buck Oil Company takes the used oil off-site for recycling.

Spent solvents generated at this location are contained in a parts cleaning station managed by Vesco Oil Company (SWMU 2). Spent petroleum naphtha is generated from tool cleaning operations. Vesco Oil Company replaces the spent petroleum naphtha every 3 weeks.

O.J. Transport stores used oil-soaked rags in a refuse dumpster (SWMU 3) located within the truck maintenance area at the East Ferry Street location. Table 2 lists the primary wastes handled at the facility, in the past and present, by GMC Fisher Body and O.J. Transport.

2.4 RELEASE HISTORY

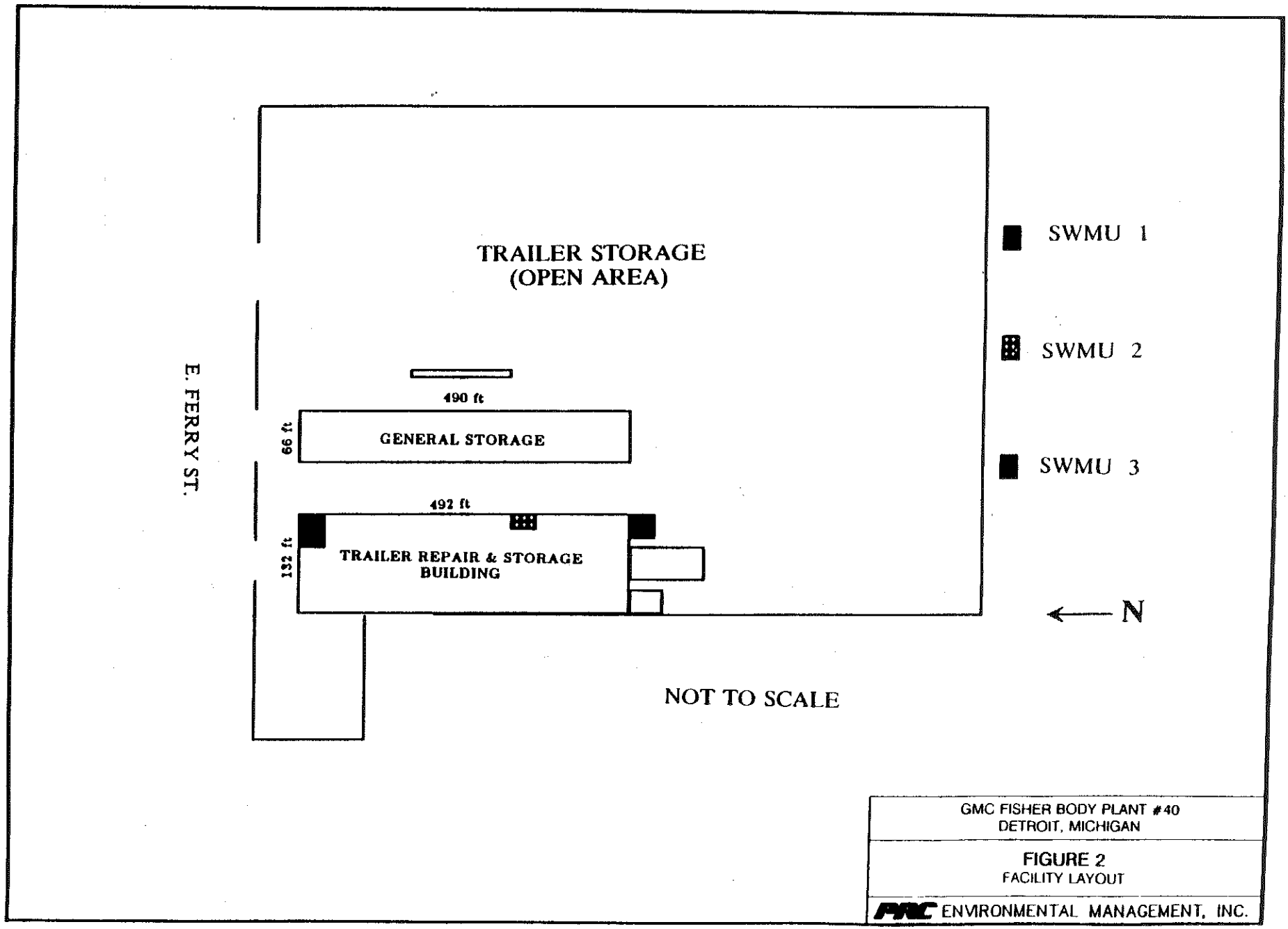
No documented releases into ground water, surface water, air, or soil from this facility were found during the PA/VSI.

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMUs)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Former Drum Storage Area	Yes	Closed
2	Vesco Parts Cleaner	No	Active
3	Refuse Dumpster	No	Active

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.



GMC FISHER BODY PLANT #40
DETROIT, MICHIGAN

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Waste paints, thinners, cleaners/D001*	Painting	1
Spent mineral spirits solvent/D001, D008	Parts washer	2
Oily Rags	Oil changes	3

Note:

* This waste was generated in the past.

2.5 REGULATORY HISTORY

The facility originally submitted a Part A Permit Application in November 1980. According to an EPA Region 5 correspondence letter dated August 31, 1982, the facility did not require a permit under RCRA Section 3005. EPA stated that the facility appeared to qualify for a conditionally exempt small quantity generator exemption as defined in 40 CFR Section 261.5. GMC then attempted to withdraw its Part A permit application after determining that it did not require a permit. It is our assumption that EPA did not approve the withdrawal request since the records show that in 1984, GMC decided to close its operation at this facility and submitted a closure plan. GMC closed a former drum storage area (SWMU 1) and its closure was inspected and certified by a professional engineer. At the end of 1984, O.J. Transport bought the facility. In 1988, the Michigan Department of Natural Resources conducted an inspection of the facility. The purpose of the inspection was to inspect areas where hazardous waste storage took place and determine whether GMC closed the area in accordance with the approved closure plan. The inspection report showed that closure was performed in accordance with the approved plan.

The O.J. Transport facility is a conditionally exempt small quantity generator; it holds no air or water permits, and discharges its wastewater directly into the city's sewer system. Lakeside Disposal, Inc., a licensed transporter, disposes of O.J. Transport's used, oil-soaked rags. In addition, Vesco Oil Company picks up the facility's spent spirit mineral solvent from facility parts-washer equipment. O.J. Transport has not been cited for any environmental violations.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the O.J. Transport facility.

2.6.1 Climate

The climate in Detroit and its surrounding area is characterized by evenly distributed precipitation throughout the year. The average precipitation is 30 to 33 inches. Average monthly temperatures range from a high of 72 degrees (°) Fahrenheit (F) in July to a low of 23 °F in January. Weather in the facility vicinity is controlled by: (1) location with respect to major storm tracks, and (2) proximity to, and influence of the Great Lakes. Typical winter storms bring periods of rain or snow. Summer storms usually pass to the north and are often associated with brief showers and sometimes thunder showers with high winds. The Great Lakes act as a mitigant to most climatic extremes (Erickson, 1990).

Due to the topography of the area, moist northwest air dries prior to reaching the Detroit area. For example, the summer showers commonly coming from the northwest often dissipate before reaching Detroit. The winter northwesterly winds bring snow to all of Michigan, but it rarely accumulates to measurable depth in the Detroit area. Southeasterly winds generally contain more moisture. In any season, the area's heaviest precipitation is brought on by southeasterly winds. One-year, 24-hour rainfall for this area is about 2 inches (National Oceanic and Atmospheric Administration, 1980).

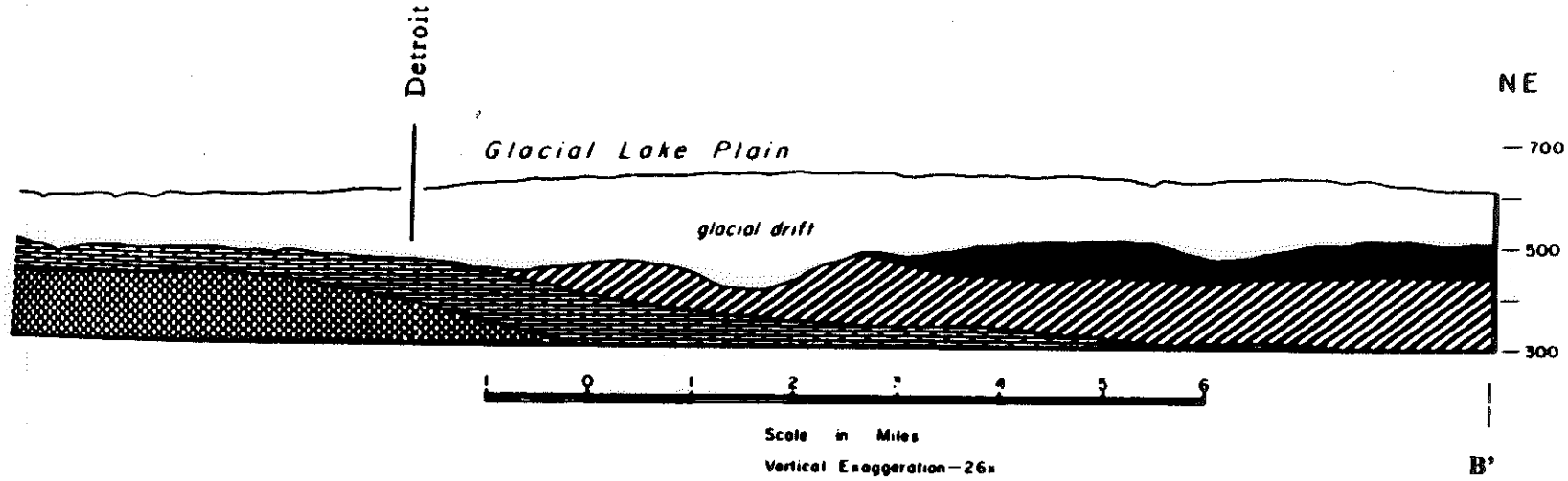
2.6.2 Flood Plain and Surface Water

The closest body of water to the facility is the Detroit River, about 4 miles from the facility. The Detroit River flows northeastwardly and empties into Lake St. Clair. The Detroit River is used by the city of Detroit as its primary water source. The River's 100-year flood plain follows the adjacent 580-foot contour. The O.J. Transport's average site elevation is on the 630-foot contour, roughly 50-feet above the flood plain (USGS, 1974).

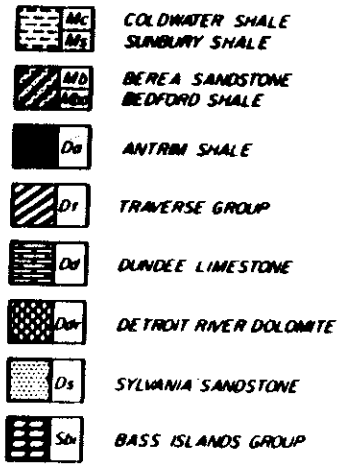
2.6.3 Geology and Soils

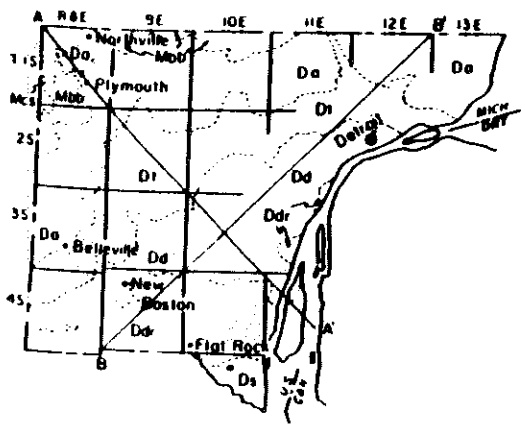
A generalized geologic cross-section of the Detroit area is illustrated in Figure 3. The surface geology of the Detroit area is characterized by a mosaic of glacial and organic deposits. Present land forms are the result of Pleistocene Epoch glaciation and subsequent deposition and erosion. The present land forms consist primarily of materials deposited during the Cary substage of the Wisconsin Glacial stage; however, the hardpan encountered just above the bedrock in the downtown Detroit area occupies part of an ancient glacial lake bed of gently sloping to nearly flat terrain that has been incised by presently flowing rivers and streams. Glacial deposits over bedrock range in thickness from 120 to 200 feet in this area. These deposits consist mainly of layers of glacial till of varying thickness and a thick sequence of lacustrine clays and silts. The areal distribution of permeable surface deposits in southeast Michigan is illustrated in Figure 4.

The bedrock of Detroit consists of approximately 830 feet of consolidated and cemented Middle Devonian limestone from the Paleozoic era. This structural feature underlies all of Michigan and portions of neighboring states. Within this structural basin, the sedimentary rocks dip at an angle of less than 1 degree toward the center of the basin, which is located beneath the central portion of the southern peninsula (Mozola, 1969).



LEGEND





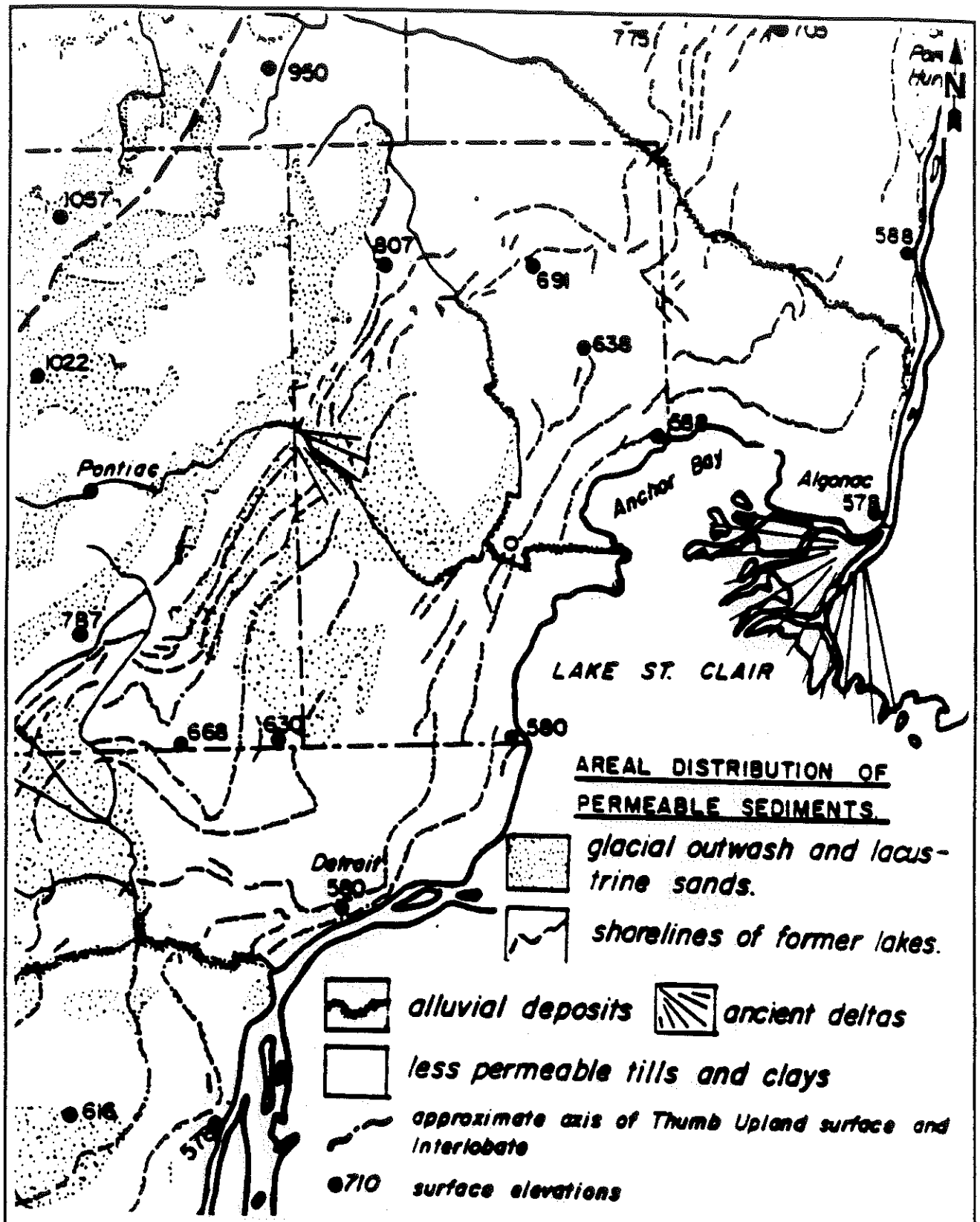
SOURCE: MOZOLA, 1969

GMC FISHER BODY PLANT #40
DETROIT, MICHIGAN

FIGURE 3

GEOLOGIC STRUCTURE SECTION

PMC ENVIRONMENTAL MANAGEMENT, INC.



SCALE NOT AVAILABLE

SOURCE: MOZOLA, 1969

GMC FISHER BODY PLANT #40
DETROIT, MICHIGAN

FIGURE 4
DISTRIBUTION OF PERMEABLE SURFACE DEPOSITS IN SOUTHEAST MICHIGAN

PMC ENVIRONMENTAL MANAGEMENT, INC.

Soils of the area surrounding the plant are mainly of the Pewamo-Blount-Metadora association. This soil association is known for having nearly level to gently sloping, very poorly drained to somewhat poorly drained soils that have a fine textured to moderately coarse textured subsoil. The landscape in this soil association is one of nearly level to gently sloping lake plains and low moraines that are dissected by streams and creeks (U.S. Soil Conservation Service, 1977).

2.6.4 Ground Water

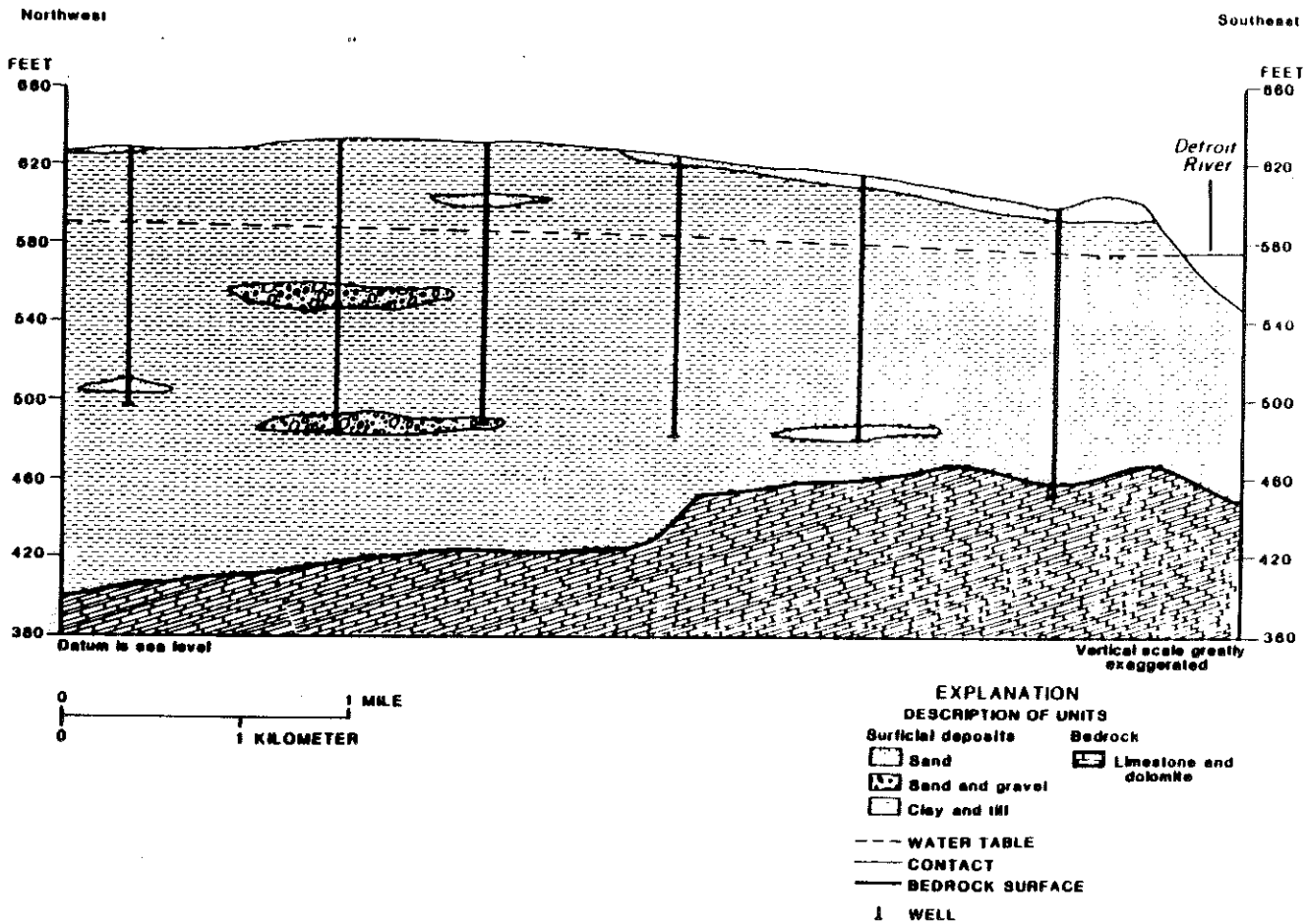
No site-specific information pertaining to ground water was available during the PA/VSI; however, a description of ground-water conditions based on regional information is described below. Based on information obtained during the PA/VSI, ground water is not used within a 3-mile radius of the site.

Ground water occurs beneath the site in water table conditions at approximately 40-feet beneath ground surface and generally flows towards the Detroit river. However, because Detroit is located on a glacial lake plain, comprised primarily of silts and clays, the area is not favorable for the development of wells of moderate-to-large yields. Storage capacities are limited and well failures can be expected during prolonged droughts (USGS, 1989). Although the lake plain has a high frequency of dry holes, small domestic supplies within intermittent zones of relatively greater permeability than the surrounding clay and silt deposits are normally possible (Figure 5). These intermittent zones occur under confined conditions and both flowing and non-flowing wells can be expected. Southeast from the junction of the lake plain with the glacial moraines (Figure 6), the frequency of occurrence, thickness, and extent of these confined ground-water bearing zones decreases towards the Detroit River.

Although the silt and clay deposits beneath the site have limited ability to yield usable quantities of water, the quality of the shallow ground water is usually soft and potable unless contaminated by man. In the aforementioned intermittent zones, mineralization increases with depth. Additionally, the quality of water from deep confined zones is often impaired by chlorides, hydrogen sulfide, and methane gas (Mozola, 1969).

2.7 RECEPTORS

The O.J. Transport facility is an industrial/residential area in Detroit, with a few homes located approximately 500 feet east of the facility. On-site access is restricted by a fence surrounding the facility. The potential for on-site exposure to area residents is low. There are no sources of air emissions from the facility.

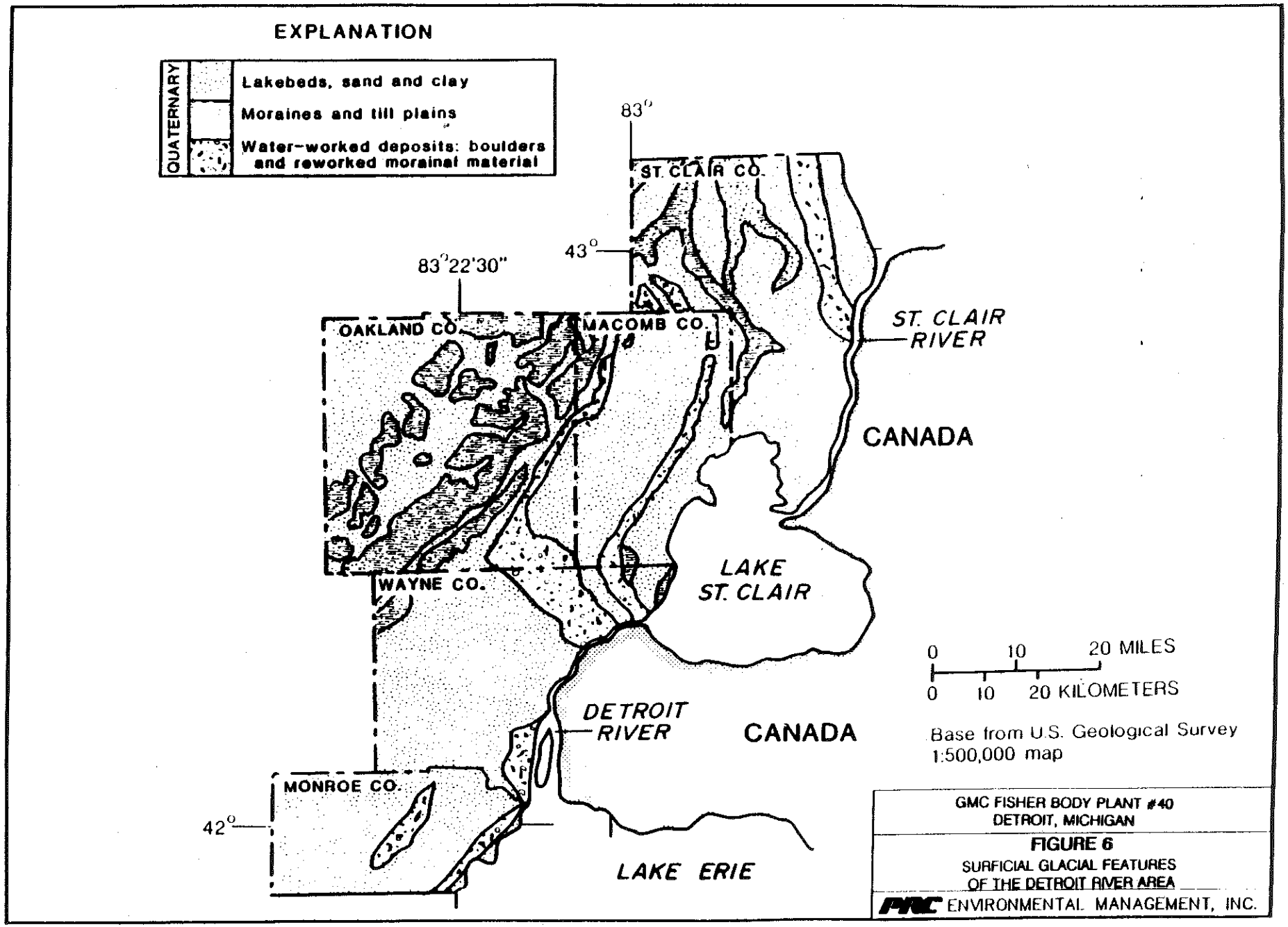


GMC FISHER BODY PLANT #40
DETROIT, MICHIGAN

FIGURE 5

REPRESENTATIVE GEOLOGIC CROSS-SECTION OF THE DETROIT AREA

PRC ENVIRONMENTAL MANAGEMENT, INC.



GMC FISHER BODY PLANT #40
DETROIT, MICHIGAN

FIGURE 6

SURFICIAL GLACIAL FEATURES OF THE DETROIT RIVER AREA

PRC ENVIRONMENTAL MANAGEMENT, INC.

The nearest surface-water intake is the Detroit River, used for drinking water and recreational purposes. Any direct discharges of hazardous wastes or hazardous constituents from the facility is unlikely since the river is about 4-miles away.

The potential for release to ground water is low. There is no potable aquifer at the site. Local residents get their drinking water from the Detroit River. There are no ground-water wells at or in the vicinity of the site. The direction of groundwater flow at the site is eastward (US EPA, 1989).

There are no sensitive environments, such as public parks, critical wildlife habitats, wetlands, etc., in the facility's vicinity.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 3 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, release history, and PRC observations.

SWMU 1	**Former Drum Storage Area**
Unit Description:	The former drum storage area consists of a 4- by 5-foot pad located inside the flammable and hazardous materials storage area at the East Ferry Street location. This area is curbed and contains no drains. The floor is made of concrete and the walls are made of brick. The capacity of the drum storage area is 110 to 165 gallons (2 to 3 drums). Photos 1 and 2 of Attachment B depicts this SWMU.
Date of Startup:	This storage area was first used in 1977.
Date of Closure:	Underwent RCRA closure; completed on December 18, 1984.
Wastes Managed:	Wastes managed consisted of waste maintenance paints, thinners, and miscellaneous cleaners (D001) used in plastic tooling operations.
Release Controls:	This area is contained by brick walls and a concrete floor.
History of Release:	No releases from this SWMU have been documented.
Observations:	No drums were present in the area, and no visible releases were noted.

SWMU 2	**Vesco Parts Cleaner**
Unit Description:	The Vesco parts cleaner is a 30-gallon self-contained recycling parts washer. It is used to clean machinery, parts, bolts, and any other metal devices covered with oil and grease. The parts cleaner is at the E. Ferry Street location in the trailer repair and storage building; it is depicted in Photo 3 of Attachment B.
Date of Startup:	The parts-cleaning equipment is currently operational and has been since 1985.
Date of Closure:	The unit is currently operational.
Wastes Managed:	The primary waste of the parts cleaner is spent mineral spirits solvent. These mineral spirits are classified as an acute hazard and as a fire hazard (D001). Waste is recycled every 3 weeks.
Release Controls:	With the exception of the release controls that the unit itself provides, and the concrete floor the unit is on, there are no release controls.
History of Release:	There are no documented releases from this SWMU.
Observations:	The unit appears to be in good condition.

SWMU 3	**Refuse Dumpster**
Unit Description:	The refuse dumpster is in the trailer repair and storage building at the E. Ferry Street location. It is used to store used, oil-soaked rags and other debris. The waste is picked up by Lakeside Disposal Inc..
Date of Startup:	This unit was first used in 1985.
Date of Closure:	Unit is currently operational.
Wastes Managed:	Used, oil-soaked rags and other debris.
Release Controls:	Metal dumpster contains waste. There is no liquid waste in this SWMU.
History of Release:	No releases from this SWMU have been documented.
Observations:	Dumpster appeared to be in good condition.

RELEASED
DATE 11/8/01
RIN #
INITIALS

ENFORCEMENT CONFIDENTIAL

4.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI conducted at the O.J. Transport facility identified 3 SWMUs. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, including the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition is discussed in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the O.J. Transport facility at East Ferry Street and suggested further actions.

SWMU 1 **Former Drum Storage Area**

Conclusions: This unit was used by GMC for storage of flammable and hazardous materials. It has not been used for any activities involving hazardous waste management since its closure in 1984. All hazardous wastes were removed when it was closed. There is low potential for releases to any environmental media.

Recommendations: No further action.

SWMU 2 **Vesco Parts Cleaner**

Conclusions: This unit is a 30-gallon self-contained recycling parts washer. It uses mineral spirits solvent as the washer material. The spent solution is replaced with clean solution every 3 weeks by Vesco. Any release will be contained on the concrete floor over which the unit is standing.

Recommendations: No further action.

SWMU 3 **Refuse Dumpster**

Conclusions: The dumpster is located within the trailer repair and storage building. It is used to store oil-soaked rags and other debris. The waste is removed for off-site disposal by Lakeside Disposal Inc. The dumpster does not contain any liquid, therefore migration of hazardous wastes or hazardous constituents is highly unlikely.

Recommendations: No further action.

ENFORCEMENT CONFIDENTIAL

TABLE 3

SWMU SUMMARY

SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1. Former Drum Storage Area	1977 to 1985	None	No further action
2. Vesco Parts Cleaner	1985 to present	None	No further action
3. Refuse Dumpster	1985 to present	None	No further action

REFERENCES

Erickson, Mary C., 1990, Meteorologist, National Weather Service, Personal communications with Patricia Murphy, PRC Environmental Management, Inc. (September 26).

GMC, 1984. Closure Plan for GMC Fisher Body Plant 40, July 20.

Mozola, A.J., 1969, Geology for Land and Ground Water Development in Wayne County, Michigan, State of Michigan Department of Natural Resources, Report of investigation 3.

National Oceanic and Atmospheric Administration, 1980, Environmental Data Information Service, Narrative Climatological Summary, Detroit, Michigan, Metro Airport.

O.J. Transport, 1991. Letter to U.S. EPA Region 5, April 3.

PRC, 1991. Preliminary Assessment and Visual Site Inspection, April 4.

U.S. Geological Survey, 1989, Ground-water Flow and Quality Near the Upper Great Lakes Connecting Channels, Michigan.

U.S. Geological Survey, 1974, Map of Flood Prone Areas.

U.S. Soil Conservation Service, 1977, Soils Survey of Wayne County Area, Michigan

U.S. Environmental Protection Agency, 1984, Letter to GMC Fisher Body, October 28.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MI	MID 005 356 748

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER				
O.J. Transport (formerly GMC Fisher Body Plant 40)	150 E. Ferry Avenue				
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY CODE	08 CONG DIST
Detroit	MI	48211	Wayne		
09 COORDINATES: LATITUDE 42°22'21"	LONGITUDE 83°03'30"				

10 DIRECTIONS TO SITE *(Starting from nearest public road)*

Take the Woodward Avenue (southbound) exit from I-94. Turn left on Ferry Avenue and continue to 1500 Ferry Avenue on the right.

III. RESPONSIBLE PARTIES

01 OWNER *(if known)*	02 STREET *(Business, mailing residential)*		
O.J. Transport	1500 E. Ferry Avenue		
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Detroit	MI	48211	(313) 924-2240
07 OPERATOR *(If known and different from owner)*	08 STREET *(Business, mailing, residential)*		
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
			( )

13 TYPE OF OWNERSHIP *(Check one)*

■ A. PRIVATE ☐ B. FEDERAL: _____ *(Agency name)* ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL

☐ F. OTHER _____ *(Specify)* ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE *(Check all that apply)*

☐ A. RCRA 3010 DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ B. UNCONTROLLED WASTE SITE *(CERCLA 103 c)* DATE RECEIVED: ___/___/___ (MONTH DAY YEAR) ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

■ YES DATE ___/___/___
☐ NO

BY *(Check all that apply)*
☐ A. EPA ■ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____ *(Specify)*

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS *(Check one)*	03 YEARS OF OPERATION
■ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN	1977 (BEGINNING YEAR) | Present (ENDING YEAR) ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Used waste oil from truck oil changes and waste solvents from tool cleaning devices.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

Current waste management practices pose very low potential hazard to environmental and/or population.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION *(Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)*

☐ A. HIGH *(Inspection required promptly)* ☐ B. MEDIUM *(Inspection required)* ■ C. LOW *(Inspect on time-available basis)* ☐ D. NONE *(No further action needed; complete current disposition form)*

VI. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF *(Agency/Organization)*			03 TELEPHONE NUMBER
Kevin Pierard	U.S. EPA			(312) 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER	08 DATE
Steve Tsadwa		PRC-EMI	703-883-8881	04/04/91 (MONTH DAY YEAR)

EPA

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT
PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE	02 SITE NUMBER
MI	MID 005 356 746

II. WASTE STATES, QUANTITIES, AND CHARACTERISTICS

01 PHYSICAL STATES *(Check all that apply)*

- ■ A. SOLID
- □ B. POWDER, FINES
- □ C. SLUDGE
- □ D. OTHER _____ *(Specify)*
- □ E. SLURRY
- ■ F. LIQUID
- □ G. GAS

02 WASTE QUANTITY AT SITE *(Measures of waste quantities must be independent)*

TON _____

CUBIC YARDS _____

NO. OF DRUMS _____

03 WASTE CHARACTERISTICS *(Check all that apply)*

- ■ A. TOXIC
- □ B. CORROSIVE
- □ C. RADIOACTIVE
- □ D. PERSISTENT
- □ E. SOLUBLE
- □ F. INFECTIOUS
- □ G. FLAMMABLE
- ■ H. IGNITABLE
- □ I. HIGHLY VOLATILE
- □ J. EXPLOSIVE
- □ K. REACTIVE
- □ L. INCOMPATIBLE
- □ M. NOT APPLICABLE

III. WASTE TYPE

CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS
SLU	SLUDGE			
OLW	OILY WASTE	15/mo.	Ga.	Truck oil changes
SOL	SOLVENTS	32/3 mo.	Ga.	Cleaning tools
PSD	PESTICIDES			
OCC	OTHER ORGANIC CHEMICALS			
IOC	INORGANIC CHEMICALS			
ACD	ACIDS			
BAS	BASES			
MES	HEAVY METALS			

IV. HAZARDOUS SUBSTANCES *(See Appendix for most frequently cited CAS Numbers)*

01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPOSAL METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION

V. FEEDSTOCKS *(See Appendix for CAS Numbers)*

CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER
FDS			FDS		
FDS			FDS		
FDS			FDS		
FDS			FDS		

VI. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

EPA Region 5 RCRA files, Michigan Department of Natural Resources Hazardous Waste Management Section files, and Wayne County Health Department files. Preliminary Assessment/Visual Site Inspection, April 4, 1991.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE MI	02 SITE NUMBER MID 005 356 746

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None. No portable aquifer at the site.

01 ☐ B. SURFACE WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None. Detroit River is about 4 miles away from the site.

01 ☐ C. CONTAMINATION OF AIR — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None.

01 ☐ E. DIRECT CONTACT — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None.

01 ☐ F. CONTAMINATION OF SOIL — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) — 04 NARRATIVE DESCRIPTION

None.

01 ☐ G. DRINKING WATER CONTAMINATION — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None.

01 ☒ H. WORKER EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☒ POTENTIAL — ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

Technicians are potentially exposed to cleaning solvents.

01 ☐ I. POPULATION EXPOSURE/INJURY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None.

EPA

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION	
01 STATE MI	02 SITE NUMBER MID 005 356 746

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

01 ☐ K. DAMAGE TO FAUNA — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None.

01 ☐ L. CONTAMINATION OF FOOD CHAIN — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ — 04 NARRATIVE DESCRIPTION

None.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS — ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING — 02 ☐ OBSERVED (DATE: _____) — ☐ POTENTIAL — ☐ ALLEGED

04 NARRATIVE DESCRIPTION

None.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None.

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION *(Cite specific references; e.g., state files, sample analysis, reports)*

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

O.J. Transport
(Former GMC Fisher Body Plant 40)
Detroit, Michigan
MID 005 356 746

Date:	April 4, 1991
Facility Representatives:	Dan Hay Marriellen Miller Ken Schmidt (313) 924-2240
MDNR Representative:	Chris Silva (313) 953-0241
Inspection Team:	Steve Tsadwa, PRC Environmental Management, Inc. H. Wing Tse, PRC Environmental Management, Inc.
Photographer:	H. Wing Tse
Weather Conditions:	Partly Cloudy, temperature in the 50s
Summary of Activities:	The visual site inspection began at 8:30 a.m at the O.J. Transport facility at 1500 E. Ferry Street. PRC Environmental Management's inspection team was joined by MDNR's and the facility's representatives. Steve Tsadwa presented the purpose of the site visit. Dan Hay mentioned that the front part of the facility was used for trailer maintenance and tractor storage, and the back part of the facility to store trailer and tractor parts, and that no waste was generated from the inspected area. The site tour commenced at 9:05 a.m. Photographs were taken of the facility's solid waste management units (SWMUs). The tour was completed at 10:00 a.m. The PRC Environmental Management team, MDNR representative, and the three facility representatives drove to the other location of O.J. Transport at 10290 Gratiot Street. PRC Environmental Management's inspection team took some photographs of the SWMUs at that location. PRC Environmental Management's inspection team drove back to the facility at 1500 E. Ferry Street with the others at 11:55 p.m. A brief exit interview was conducted with Dan Hay and Marriellen Miller. The PRC Environmental Management inspection team left the property at 12:05 p.m.

Photograph No. 1 **Location:** SWMU 1
Orientation: Northeast **Date:** 04/04/91
Description: The former hazardous drum storage area is a 4 ft. x 5 ft. brick wall structure located at the southeastern corner of the trailer repair and storage building. The brick wall on the upper right-hand corner of the photograph is the trailer repair and storage building.

Photograph No. 2 **Location:** SWMU 1
Orientation: East **Date:** 04/04/91
Description: Inside of former hazardous drum storage area. The storage area houses empty shelves inside and debris on its concrete floor.

Photograph No. 3 **Location:** SWMU 2
Orientation: East **Date:** 04/04/91
Description: The SWMU consists of a blue 35-gallon drum of Vesco parts-cleaning solvent. The solvent is used to remove oil and grease from metal parts. After cleaning, the solvent is recycled back to the drum.

Photograph No. 4 **Location:** SWMU 3
Orientation: West **Date:** 04/04/91
Description: Oil-soaked rags and other debris are disposed of at this 3-cubic-yard steel refuse dumpster insdie the northeastern corner of the trailer repair and storage building.

Photograph No. 5 **Location:** Front of facility
Orientation: East - West **Date:** 04/04/91
Description: Panoramic view of O.J. Transport Facility facing south on E. Ferry Street. The building on the left is the general storage building.

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

Date April 4, 1991

Time: 8:20 A.M.

Weather: Partly Cloudy, 50's

Participants:

Steve Tsaduva - PRC

H. Wing Tse - PRC

Dan Hay - O.J. Transport

Marrielleen Miller - O.J. Transport

Ken Schmidt - O.J. Transport

Chris Silva - MDNR

8:30 The facility representatives met PRC's inspection team and MDNR's representative in a small conference room. Dan Hay asked the objective of the UST. Steve Tsaduva explained the purpose of the visit. Dan Hay says there is no manufacturing being done at this location. The front pad of the building is used for semi-trailer repair. The back pad is used for parts storage and discarded parts. Dan says there are no USTs at this location. Dan says that they have another facility at Gratiot St in Detroit, Michigan. At that location they have an UST. All used oil generated at the Ferry St is taken to the Gratiot facility. From Gratiot it is picked up by Buckeye Oil Company. There are a total of 19 employees - 8 mechanics, 2 sales, and 3 safety and driving recruiters and the remaining are dispatchers. He says there are some residential areas in the vicinity of the facility.

Waste oil rags are stored in a metal roller box. A Contractor picks it up on a regular base.
Oil is stored in 5-gallon tanks and taken to Gratiot facility, and stored in an UST until disposal. At the Gratiot facility there is a safety kleen parts washer. Here at E. Ferry St is a similar Vesco parts washer used for similar purpose.
At about 9:05 we started the site tour. First we went to the trailer repair room. It has dimensions of 200 ft. / 132 ft.

Within this area is a small room that houses a vesco parts washer. This room has dimension of 30 ft by 30 ft x 12 ft. It does not have a door but has an opening. The vesco cleaning unit uses a petroleum naphtha. Don and Ken claimed that the petroleum naptha is replaced twice a [illegible]. Also in this room is [illegible] Gear lube for wheel bearing. The vesco parts washer and Gear lube drums are stored on [illegible] material.

No stains were observed on the concrete floor.
At the back is an area known as the Bay 2 area. Visible here are old furnaces used by former owner, GMC Fisher Body Plant #2. There is no electricity in this room. Aluminum parts are stored in this area and are sold. Now we are proceeding to the Old Drum Storage Area. The Storage was closed by GMC in 1984. D.J. Transport has not been using the area since it bought the property towards the end of 1984.

Inside the room are signs "Hazardous Waste". The entrance to this room is locked. Therefore there is a limited access to this storage area. East of this room is the Pit #1 Storage Area where loaded trucks are parked overnight. This area has a concrete floor - There is only electricity - no water. Used oil Bag tank - This tank is located in the front building (Bay 1 area). It is used to store rags used in the semi trailer repair operations for cleaning. It is filled

with rags and emptied once a week or once in two-3 weeks depending on the business.

Now we are ready to proceed to their facility at Gratiot Street in Detroit. At that facility we observed a Safety Kleen parts washer unit. Some stain was visible on the floor near the Unit to O. J. Transport Started operation here in 1973. It conducts a trailer repairing.

Safety Kleen uses a Dual solvent. It is replaced by a fresh one every two weeks. At the back of the building is a 1000-gallon UST. It is used to store used oil from that location as well as from the E. Ferry facility. Buckeye Oil Company comes 3-4 months and empties the tank. This location was later expanded to E. Ferry facility in 1985. GMC sold the property to the city and O. J. Transport bought it from the city. There are two 8,000 gallon diesel tanks. They were installed 20+ years ago. They were tested once in 1989. These tanks already existed

at this location (Capitol) when O J Transport bought the facility from Hertz Truck rental in 1973. O J Transport owns about 60 trucks and few more are owned by other porters which O J Transport uses. PRC team is going back to the E Ferry St facility to pick up car and exit interview. Steve Tsotsa conducted an exit interview with the facility representative and PRC Team left the facility boundary at 12:05pm

Blank

Blank

Blank

Blank

04/04/91 HWT 50s Partly cloudy

U.S Transport (8:30 am)

Marcellen Miller

Ken Schmidt

Dan Hay

492' x 132' = area (trailer storage room and repair room)

OJT did not apply for an EPA ID

Trailer repair

store tractors that are being used, repair trailer. Back part of the building used to store pallets, aluminum, trailer and tractor parts

waste - chassie lube for suspension, gear lube

Lube container - 1 quart for 4 wheels.

Lakeside Disposal will pick up one gallon per week and take it to the other facility.

No underground storage tank at this facility.

04/04/91 HWT

The facility employs 19 people 8 of them mechanists, 2 sales people, 2 safety people, 7 dispatchers

The rock goes to Lakeside Disposal

OJT moves 5 gallon container oil to the UST on the other facility.

Safety Kleen and Bulk oil picked up the oil from the other facility

Photo 1 35 gallon naphtha petroleum cleaning solvent (D001) picked up by Vesco Oil Corp for recycling.

Photo 2 15 gallons waste oil facing sw

3 SE chassie lube

4 W room where 1, 2, 3 are stored

5 6, 7, 8 The storage area behind the trailer repair room

9 E former storage area