



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

OHIO E.P.A.

APR -7 2015

ENTERED DIRECTOR'S JOURNAL

APR 07 2015

Ms. Lynn Beamer
Ford Motor Company - Cleveland Site
5600 Henry Ford Blvd.
Brook Park, Ohio 44142

Re: Ford Motor Company
Permit – Short Term
Approval
Beneficial Use
Cuyahoga County
BENU020762

**Subject: Ford Motor Company - Cleveland Site
Land Application Management Plan Permit
Spent Non-Toxic Foundry Sand**

Effective Date: April 7, 2015

Expiration Date: April 7, 2025

Dear Ms. Beamer:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the land application management plan (LAMP) permit application received September 2, 2014, submitted by Ford Motor Company - Cleveland Site (Ford), pursuant to Chapter 6111 of the Ohio Revised Code (ORC) for the proposed use of spent non-toxic foundry sand generated by Ford in Brook Park, Ohio. The submitted LAMP permit application proposes to use spent non-toxic foundry sand, which consists of silica sand with chemical binders from engineered castings. Ford intends to use the spent non-toxic foundry sand to fill its former mill pond pump house basement and the former Cleveland Casting Plant basement and pits. Accumulation and screening of the spent non-toxic foundry sand occurred on-site at 5600 Henry Ford Blvd., Brook Park, Ohio.

Pursuant to the authority under ORC Chapter 6111, the LAMP permit for Ford, received September 2, 2014, is approved subject to compliance with all conditions below.

CONDITIONS

1. This LAMP permit authorizes Ford to use spent non-toxic foundry sand from Ford as fill material for its mill pond pump house basement and the Cleveland Casting Plant pits and basement, in accordance with the LAMP permit application submitted on September 2, 2014. All other uses must be separately approved by

Ohio EPA. Only spent non-toxic foundry sand from Ford, located at 5600 Henry Ford Blvd. in Brook Park, Ohio, as identified in this LAMP, is eligible for use under this permit.

2. The Director, or his authorized representative(s), may enter upon the premises of the Ford facility at any reasonable time for the purpose of conducting inspections, collecting samples of spent non-toxic foundry sand, conducting tests, or examining records or reports pertaining to the use of the spent non-toxic foundry sand.
3. Issuance of this LAMP permit does not relieve Ford of the duty to comply with all applicable federal, state, and local laws, ordinances, and regulations.
4. Ford shall notify Ohio EPA within seven days if it observes a substantial change in the spent non-toxic foundry sand intended for use. Under such circumstances, the Director may request that Ford submit a revised LAMP permit application for approval. For the purpose of this LAMP permit, a substantial change is a change which results in spent non-toxic foundry sand with additional constituents or a higher concentration of constituents.
5. The following records shall be maintained by Ford for a minimum of 5 years after the use of the spent non-toxic foundry sand and be made available to Ohio EPA upon request:
 - a. Records of the annual volume of spent non-toxic foundry sand that is designated for use and the amount of spent non-toxic foundry sand actually used;
 - b. The sampling plan detailing where samples of spent non-toxic foundry sand were collected, how those samples were collected, dates of samples that were collected, and a list of parameters that were used to characterize the samples;
 - c. All laboratory reports of all characterizations of the spent non-toxic foundry sand.
6. By January 31 of each year, Ford shall submit a report identifying the uses of the spent non-toxic foundry sand for the previous calendar year. At a minimum, the annual report shall include the use along with the dry tons used.
7. In the annual report, Ford shall include the following annual certification statement. The certification statement shall be printed out and signed beginning one year after the effective date of this approval and annually thereafter:

"I certify, under penalty of law, that the information contained in this annual report that will be used to determine compliance with the requirements contained in Chapter 6111 of the ORC, and all rules thereunder, for the period beginning (insert date of last certification statement) and ending (insert current certification statement date) was prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

8. For the first certification statement, insert the initial effective date of this LAMP permit as the beginning date for the certified period of time. The certification statement shall be signed by one of the following persons: In the case of a corporation, by a principal executive officer of at least the level of vice president or the principal executive officer's duly authorized representative, if such representative is responsible for the overall operation of the facility. In the case of a partnership, a general partner. In the case of a sole proprietorship, the proprietor. The signature shall constitute personal affirmation that all statements or assertions of fact in the records are true and complete and comply fully with applicable state requirements and shall subject the signatory to liability under ORC Section 2921.13.
9. The annual report shall be sent to the following address:

Ohio EPA - DMWM
Authorizing Actions and Engineering Unit
P.O. Box 1049
Columbus, OH 43216-1049
10. The spent non-toxic foundry sand shall not create a nuisance and shall not adversely affect public health or safety or the environment. Should a nuisance condition develop, or a determination be made by Ohio EPA that use of spent non-toxic foundry sand is a threat to public health or safety or the environment, then permission to use this material may be revoked upon written notification from the Director. Immediately upon the effective date of any such revocation, Ford shall cease storage and use of the spent non-toxic foundry sand.
11. Ford shall not cause pollution or cause any spent non-toxic foundry sand to cause pollution to any waters of the state, except in accordance with an effective national pollutant discharge elimination system (NPDES) permit. Any unauthorized discharges to waters of the state must be reported to Ohio EPA, by calling 1-800-282-9378, within twenty-four (24) hours of discovery.
12. The Director shall be notified in writing within seven days if Ford discovers noncompliance with this LAMP permit.

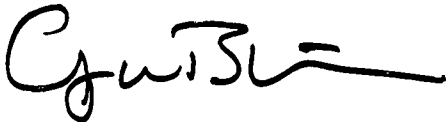
13. The Director may add, delete, or change any conditions of this LAMP permit to protect human health or the environment.
14. This permit and the authorization to use spent non-toxic foundry sand from Ford shall expire at midnight on the expiration date shown above. In order to renew the permit to use spent non-toxic foundry sand beyond the above date of expiration, Ford shall submit such information and forms as are required by Ohio EPA not later than 90 days prior to the above date of expiration.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, Ohio 43215

If you have any questions concerning this authorization, please contact Phil Cherosky of Ohio EPA, Division of Materials and Waste Management, at (614) 644-3249.

Sincerely,



Craig W. Butler
Director

CWB/PC

Attachment: LAMP
cc: Ford Motor Company Cleveland - Site