



Environmental Quality Office
Sustainability, Environment & Safety
Engineering

Ford Motor Company
Fairlane Plaza North
290 Town Center Drive, Suite 800
Dearborn, MI 48126

March 11, 2019

Mr. Paul Owens
District Supervisor, Southeast Michigan District Office
MDEQ Remediation and Redevelopment Division
27700 Donald Court
Warren, Michigan 48092-2793
owensp@michigan.gov
VIA E-MAIL

Re: Ford Livonia Transmission Plant
Revised Response to MDEQ Letter dated February 1, 2019

Dear Paul:

On behalf of Ford Motor Company (Ford), this letter and the attached memo from Arcadis dated March 11, 2019 provide updated information to Ford's February 8, 2019 response to your February 1, 2019 letter regarding MDEQ review of shallow groundwater data collected in accordance with MDEQ-approved Response Activity Plan-Vapor Intrusion Evaluation and MDEQ's November 27, 2018 letter.

We remain fully committed to protecting human health and the environment. Importantly, as previously shared with you, all indoor air sampling, sub-slab sampling, and sump sampling (if a sump exists) shows no detection of vinyl chloride in the residential neighborhood.

If you have any questions, please feel free to contact me.

Sincerely,

Todd M. Walton
Manager, Global Site Assessment & Remediation

cc: Mr. Kris Hinskey, Arcadis
Mr. Shawn Collins, The Collins Law Firm, PC
Mr. Paul Bernier, City of Livonia
Senator Dayna Polehanki
Representative Laurie Pohutsky
Mr. Brian Negele, MDAG
Mr. Aaron Cooch, DHHS
Ms. Alexandra Rafalski, DHHS
Mr. Darren Bowling, MDEQ
Ms. Cyndi Mollenhour, MDEQ
Ms. Krista Reed, MDEQ
Ms. Beth Vens MDEQ
Mr. Brandon Alger, MDEQ

MEMO

To:

Paul Owens, District Supervisor MDEQ
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27700 Donald Court
Warren, Michigan 48092-2793

owensp@michigan.gov

Copies:

Mr. Brian Negele, MOAG
Mr. Darren Bowling, MDEQ
Ms. Cyndi Mollenhour, MDEQ
Ms. Beth Vens, MDEQ
Ms. Krista Reed, MDEQ
Mr. Brandon Alger, MDEQ
Mr. Todd Walton, Ford

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From:

Kris Hinskey

Mitch Wacksman

Joseph Quinnan

Date:

March 11, 2019

Arcadis Project No.:

MI001454.0007

Subject:

Livonia Transmission Plant

Memo Regarding Recent Off-site Shallow Groundwater Sampling and Pre-Emptive Mitigation

36200 Plymouth Road, Livonia, Wayne County, Michigan

MDEQ Site ID No. 82002970

On behalf of Ford Motor Company (Ford), this memo has been prepared by Arcadis of Michigan, LLC for the Livonia Transmission Plant (LTP) site (site) to update our February 8, 2019 memo based on recent shallow groundwater data results. Consistent with ongoing discussions related to the implementation of the "Response Activity Plan – Vapor Intrusion Evaluation" that was approved with modification on August 30, 2018 as part of the July 27, 2017 Consent Decree for the site, additional shallow groundwater monitoring wells have been installed in the neighborhood east of the LTP to evaluate the potential vapor intrusion to indoor air pathway (VIAP). Based on agreement with MDEQ, shallow groundwater wells would be installed at each property where sub-slab soil vapor samples could not be collected due to limitations in building construction (i.e., crawl spaces) or the presence of shallow groundwater that may be in contact with a structure.

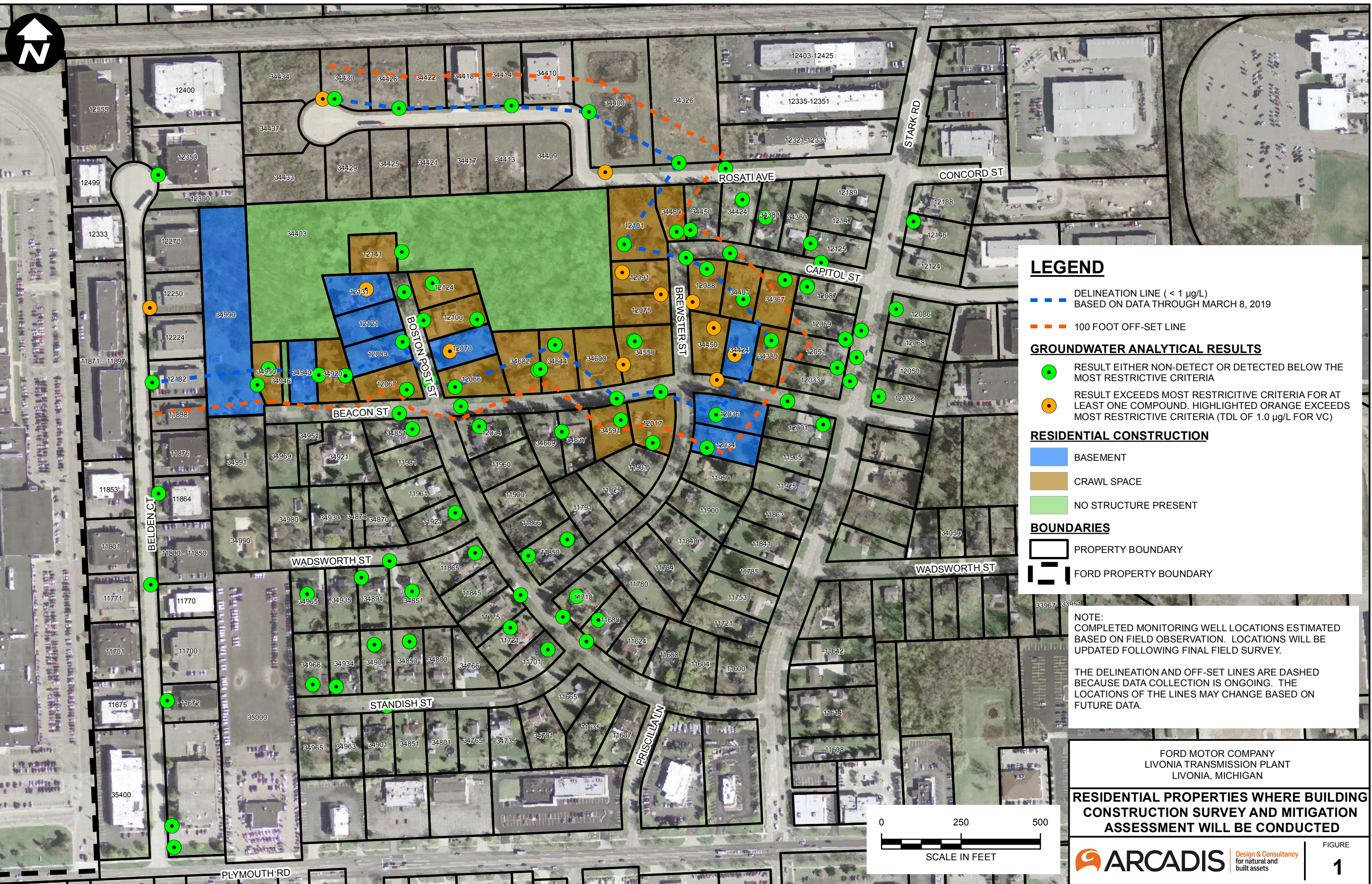
Memo Regarding Recent Off-site Shallow Groundwater Sampling and Pre-Emptive Mitigation

Arcadis installed 107 wells off-site in the neighborhood to characterize shallow groundwater. To date, groundwater has been collected from 0.5 to 1.5 feet below the water table at 102 of the shallow wells. As shown by the well locations presented on **Figure 1**, 98 shallow groundwater sample results have been received and validated. Laboratory results/data packages have been provided to MDEQ under separate transmittals.

Using the shallow groundwater data collected to date, a delineation line has been drawn for vinyl chloride of 1 µg/L and is presented in using a blue dashed line on **Figure 1**. A 100-foot buffer has also been added to the figure and is shown in an orange dashed line. Based on the updated delineation and 100-foot buffer lines shown on **Figure 1**, there are now 31 properties that will require pre-emptive mitigation.

As agreed in the March 8, 2019 teleconference call between MDEQ and Ford, if shallow groundwater data changes or multiple lines of evidence indicate a different approach is warranted, Arcadis will notify the MDEQ to discuss whether pre-emptive mitigation is required.

CITY: Novi DIV: ENV DB: MG PIC: R. ELLIS PM: K. HINSKEY PROJECT NUMBER: M1001322.0001 COORDINATE SYSTEM: NAD 1983 StatePlane Michigan South FIPS 2113 Feet Intl Z:\GISProjects\ENV\Novi\Brighton_MilFord\LVonia\GISdocs\2019-03\OffsiteBuildingConstructionSummaryContours_03122019.mxd PLOTTED: 3/12/2019 7:48:49 AM BY: tyarbrough



LEGEND

- DELINEATION LINE (< 1 µg/L) BASED ON DATA THROUGH MARCH 8, 2019
- 100 FOOT OFF-SET LINE

GROUNDWATER ANALYTICAL RESULTS

- RESULT EITHER NON-DETECT OR DETECTED BELOW THE MOST RESTRICTIVE CRITERIA
- RESULT EXCEEDS MOST RESTRICTIVE CRITERIA FOR AT LEAST ONE COMPOUND. HIGHLIGHTED ORANGE EXCEEDS MOST RESTRICTIVE CRITERIA (TDL OF 1.0 µg/L FOR VC)

RESIDENTIAL CONSTRUCTION

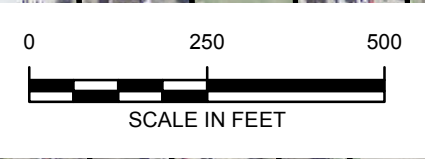
- BASEMENT
- CRAWL SPACE
- NO STRUCTURE PRESENT

BOUNDARIES

- PROPERTY BOUNDARY
- FORD PROPERTY BOUNDARY

NOTE:
 COMPLETED MONITORING WELL LOCATIONS ESTIMATED BASED ON FIELD OBSERVATION. LOCATIONS WILL BE UPDATED FOLLOWING FINAL FIELD SURVEY.

THE DELINEATION AND OFF-SET LINES ARE DASHED BECAUSE DATA COLLECTION IS ONGOING. THE LOCATIONS OF THE LINES MAY CHANGE BASED ON FUTURE DATA.



FORD MOTOR COMPANY
 LIVONIA TRANSMISSION PLANT
 LIVONIA, MICHIGAN

RESIDENTIAL PROPERTIES WHERE BUILDING CONSTRUCTION SURVEY AND MITIGATION ASSESSMENT WILL BE CONDUCTED