

Ford Motor Company

PUBLIC OUTREACH PLAN REVISION: 1

This document is a DRAFT document that has not received approval from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). This document was prepared pursuant to a court Consent Decree. The opinions, findings, and conclusions expressed are those of the authors and not those of the EGLE.

June 28, 2019

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1 INTRODUCTION

This Public Outreach Plan (Plan) was prepared by Arcadis of Michigan LLC (Arcadis) on behalf of Ford Motor Company (Ford) for the Livonia Transmission Plant (LTP) located at 36200 Plymouth Road, Livonia, Wayne County, Michigan (Site ID No. 82002970). Historical operations at LTP have resulted in environmental conditions that Ford is actively addressing under the supervision of the Michigan Department of Environment, Energy, and Great Lakes (EGLE). The original Plan was submitted to the EGLE on August 7, 2018. This updated Plan is being submitted in response to a letter received by Ford on May 28, 2019. The letter required an updated public outreach plan that includes the following:

- Establish a specific 24-hr hotline for residents to report issues/concerns with their mitigation system,
- Establish a specific email for the for residents to report issues/concerns with their mitigation systems,
- Respond to any citizen calls or emails regarding their systems within 24 hours, providing
 information, an opportunity to discuss the issue with Ford if residents request and offer a solution
 to the issue within 48 hours,
- Ford provides a written summary to the complaints received and the response provided to the residents and resolution to EGLE due the first of every month, and
- Provide the residents with a full-time communication liaison during the installation of the interim pre-emptive mitigation system.

The public outreach plan has been updated and the action items have been implemented to address these requests.

Ford is a longstanding employer and business in the Livonia community for more than 60 years. This local presence was strengthened through a May 2017 announcement of a \$350 million investment to be made at the LTP and the creation/retention of 800 jobs. To reflect Ford's local commitment, a personalized communications approach has been implemented on this project.

A cornerstone of the plan is timely information sharing, including responsiveness to neighborhood residents and other stakeholders by providing multiple opportunities to communicate actions, answer questions, and address concerns. This approach was also designed to help ensure testing could be conducted as quickly as possible, with expedient implementation of any needed mitigation.

Ford provides this Plan to help encourage continued public involvement in the project and to outline how the community and others can access information as the LTP environmental investigation and cleanup activities move forward.

1.1 Purpose of the Public Outreach Plan

The purpose of this Plan is to summarize the current and planned public outreach activities designed to engage and inform the community and others interested in the LTP project. For example, the Plan describes how the community can access project information, stay informed about project status and next steps, and be involved in EGLE's decision-making process.

The public outreach activities outlined in this Plan are consistent with the July 2017 Consent Decree between EGLE and Ford and the EGLE's July 9, 2018 and May 28, 2019 letters. As stated in the Consent Decree, Ford is required to submit a plan that details how the affected public and local units of government can obtain up-to-date information about the project and the progress and status of the assessment, mitigation, and response actions. The assessment, mitigation, and response actions are all supervised by the EGLE to ensure the Consent Decree process is followed.

2 PUBLIC OUTREACH PROGRAM

In July 2015, Ford identified the presence of chlorinated volatile organic compounds (CVOCs) in groundwater along the LTP's eastern property boundary. To protect public health and the environment, Ford initiated and completed additional investigation activities east of the LTP from October to December 2016. That investigation identified CVOCs in groundwater located beneath both commercial and residential properties east of the LTP property (i.e., Alden Village subdivision). The location of investigation activities completed to date, both onsite and offsite, are shown on Figure 1.

Investigation activities completed east of the LTP have included: monitoring well installation and groundwater sample collection, soil vapor monitoring point installation and soil gas sample collection, delivery of property-specific building questionnaires, and commercial and residential indoor air and subslab vapor sampling. Data gathered for investigation activities completed prior to December 2017, is detailed in the Conceptual Site Model (Arcadis 2017) submitted to the EGLE is December 2017. The Conceptual Site Model includes a detailed description of property history, environmental investigations conducted to characterize the site, and interim response activities completed, to the submittal date, that address those findings. Investigation activities completed after the submittal of the Conceptual Site Model have been detailed in quarterly progress reports submitted to the EGLE or will be provided in a future Remedial Investigation report.

Investigative activities have been accompanied by, and will continue to include, several types of communications tools to help inform the affected community and others of the environmental impacts.

In compliance with Section 6.9 of the Consent Decree, several public outreach activities are underway and planned. As described below, activities include: a dedicated website, direct mailings and door-to-door outreach, door hangers, community meetings, and a project 24-hour hotline phone number and contact email.

2.1 Activities Completed to Date

To date, Ford has established and maintained several methods for community engagement and easy public access to information and project representatives. Ford has complied with all necessary regulatory requirements, including prompt notification and updates to affected property owners of the presence of CVOCs in groundwater and what Ford is doing to mitigate and remediate groundwater.

Outreach activities completed to date include:

December 18, 2015, Ford submits a notice of migration to EGLE for 11 offsite properties

- February 2, 2016, Ford launches the public-facing website to provide residents and others easy
 access to information and frequent updates (<u>www.FordLivoniaBostonBeaconProject.com</u>).
 (Attachment 1)
- February 3, 2016, Ford distributes a letter and flyer concerning the public meeting and work to be completed offsite. (Attachment 2)
- February 5, 2016, Ford distributes door hangers to remind property owners of the public meeting. (Attachment 3)
- February 8, 2016, Ford conducts a public meeting at LTP to explain the project and next steps
- March 14, 2016, Ford sends letters to offsite residents providing the investigation results. (Attachment
 4)
- June 27, 2016, Ford sends letters to property owners about the need for additional investigation.
 (Attachment 5)
- September 9, 2016, Ford submits a notice of migration to EGLE for 21 offsite properties and sends letters to residents with information related to a previous investigation in August 2016. (Attachment 6)
- November 17, 2016, Ford submits a notice of migration to EGLE for 3 offsite properties
- December 9, 2016, Ford sends building and construction questionnaires to residents and commercial property owners east of the plant
- March 1, 2017, Ford sends out an additional round of building and construction questionnaires to
 residents and commercial property owners east of the plant. The purpose of the second round was to
 solicit a response from property owners who did not return a questionnaire during the first event.
- April 25, 2017, Ford sends out letters to property owners to communicate additional installation of monitoring wells and soil gas monitoring points. (Attachment 7)
- June 26, 2017, Ford submits a notice of migration to 1 offsite property owner
- July 7, 2017, Ford submits a notice of migration to 3 offsite property owners
- July 14, 2017, Ford sends letters out to property owners providing groundwater sample and soil gas sample results. (Attachment 8)
- July 22, 2017, Ford and EGLE enter into a Consent Decree, guiding several next steps in the investigation and cleanup of the project.
- August 3, 2017, Ford conducts a meeting with the EGLE and City of Livonia providing an update on the investigation activities
- December 6, 2017, Ford provided Conceptual Site Model (CSM) report, CSM response from EGLE, and the first Quarterly Progress Report to public-facing website
- December 14, 2017, Ford provided the Response Activity Plan Target Detection Limit, Response to EGLE CSM Comments, and Response Activity Plan – Remedial Investigation Vapor Intrusion Assessment to public-facing website

- January 21, 2018, Ford provided the latest Quarterly Progress Report to public-facing website
- April 18, 2018, Ford provided the Response to EGLE Comments on the Disapproval of the Response Activity Plan, and the revised Response Activity Plan Remedial Investigation and Response Activity Plan Vapor Intrusion Evaluation to public-facing website
- April 30, 2018 Ford provided the latest Quarterly Progress Report to public-facing website
- June 29, 2018, Ford updates Additional Information section of the public-facing website
- July 22, 2018, Ford provides public notice in the Detroit Free Press for a 30-day public comment period for the two Response Activity Plans (Plans)
- July 26, 2018 Ford uploads Response to EGLE July 2, 2018 Letter Request for Conceptual Site Model (CSM)
- August 1, 2018 Ford uploads latest Quarterly Progress Report to public-facing website
- August 9, 2018 Ford uploads a Public Outreach Plan to public facing website
- September 18, 2018, Ford updates Additional Information section of the public-facing website
- November 1, 2018, Ford uploads latest Quarterly Progress Report to public-facing website
- November 19, 2019, Ford attends a meeting in Lansing with EGLE to review sampling and field methodology. In addition, Ford also met with the MDHHS to discuss current site activities.
- November 30, 2018, Ford updates Additional Information section of the public-facing website
- December 3, 2019, Ford attends a meeting with EGLE at the Warren office to discuss quality assurance of the data being collected offsite.
- January 16, 2019, Ford attends a meeting via teleconference to discuss the shallow groundwater sampling and EGLE verification split sampling.
- January 22, 2019, Ford updates Additional Information section of the public-facing website
- January 24, 2019, Ford attends a meeting in the EGLE Warren office to discuss the shallow groundwater sample results.
- February 1, 2019, Ford uploads latest Quarterly Progress Report to public-facing website, EGLE sends letter to Ford regarding shallow groundwater concentrations east of LTP, and Ford sends out letters to property owners to communicate that the EGLE has requested that mitigation systems be installed at select properties. (Attachment 9)
- February 8, 2019, Ford responds to EGLE regarding the February 1, 2019 shallow groundwater letter
- February 15, 2019, Ford attends a meeting via teleconference to discuss preliminary plans for the installation of interim pre-emptive mitigation systems.
- March 5, 2019, Ford updates Additional Information section of the public-facing website
- March 6, 2019, Ford attended a meeting via teleconference to update EGLE of the progress of the installation of the interim pre-emptive mitigation systems.

- March 8, 2019, Ford attended a meeting via teleconference to discuss ongoing activities related to
 offsite.
- March 11, 2019, Ford provides EGLE with an update, with respect to the February 8, 2019, regarding shallow groundwater
- March 14, 2019, Ford provides EGLE with an update, with respect to the February 8 and March 11, 2019, regarding shallow groundwater and Ford submits an extension request to EGLE regarding the mitigation schedule
- March 17, 2019, EGLE held a meeting at Livonia City Hall to update residents on the project
- March 21, 2019, EGLE responds to Ford regarding their March 14, 2019 extension request and their shallow groundwater update letters
- March 26, 2019, EGLE responds to Ford regarding their March 11, 2019 shallow groundwater update
- March 26, 2019, Ford requests a meeting with EGLE via teleconference to discuss the offsite interim pre-emptive mitigation system installations.
- April 5, 2019, Ford established a Value Assurance Program (VAP) to protect the value of eligible properties located in Livonia, Michigan
- April 9, 2019, Ford requests a meeting with EGLE via teleconference to discuss the interim preemptive mitigation system installation.
- April 11, 2019, Ford updates Additional Information section of the public-facing website
- April 15, 2019, Ford requests a meeting with EGLE via teleconference to update EGLE of the progress that had been made with the installation of the interim pre-emptive mitigation systems.
- April 16, 2019, Ford submits a laboratory memo to EGLE
- April 17, 2019, Ford submits am extension request to EGLE regarding the mitigation schedule
- May 2, 2019, Ford uploads latest Quarterly Progress Report to public-facing website
- May 3, 2019, EGLE responds to the April 16, 2019 laboratory memo
- May 8, 2019, EGLE responds to the extension request submitted on April 17, 2019
- May 15, 2019, Ford provides additional information to EGLE as requested in their April 16, 2019 laboratory memo response
- May 17, 2019, Ford provides a partial response to EGLEs May 8, 2019 response
- May 24, 2019, Ford provides an additional response to supplement their May 17, 2019 response
- May 28, 2019, EGLE provides letter to Ford regarding resident complaints
- May 31, 2019, Ford provides a response to the May 28, 2019 letter designating a Community Liaison
- June 3, 2019, Community Liaison is present in the neighborhood assisting with any issues or concerns.

- June 7, 2019, Ford submits a notice of migration to 2 offsite property owners
- June 12, 2019, Community Liaison distributes flyers (Attachment 10) door-to-door and meets with the
 residents to assist with any issues or concerns. The dedicated website
 (<u>www.FordLivoniaBostonBeaconProject.com</u>) was also updated with the flyer and 24-hr hotline
 information.

2.1.1 Ongoing Activities

In coordination, and under the supervision of the EGLE and in cooperation with local community leaders, Ford will continue the outreach activities completed as described above and add methods as needed to address community needs and EGLE requests and requirements. Those ongoing activities and tools are expected to include the following.

2.1.1.1 Project Website

As a major communications tool for the benefit of the affected community and others, a dedicated website – FordLivoniaBostonBeaconProject.com – was promptly created and is frequently updated to keep residents informed and help ensure continued access and transparency from Ford regarding project status and next steps. The website is intended to serve as an easy-to-find and use online clearinghouse for basic information about the project such as general updates, official regulatory agency communications, sampling results, progress reports, and other reports and information.

As required by Section 6.9(a) of the Consent Decree, Ford will continue to maintain the public website for residents. Specifically, the website will at a minimum contain updated offsite sample results for any soil, groundwater, soil gas, and indoor air monitoring determined to be necessary as part of the response activities. The website will be updated no later than 30 days after sample results are received.

2.1.1.2 Community Meetings

On February 8, 2016, Ford hosted a three-hour community informational meeting at the plant. It was open to anyone with questions or concerns about the project and environmental project. City of Livonia and EGLE representatives were invited to help answer questions from their respective roles and areas of expertise and oversight. Free childcare was provided to help working parents attend and participate.

The meeting included detailed information and handouts regarding the sampling plan and locations. A "geoprobe" sampling rig was on hand to help demonstrate how the sampling is performed in the neighborhood and to help residents better understand what to expect during the work.

Ford plans to hold further community meetings in an effort to update the community of the ongoing investigation and sample results.

2.1.1.3 Public Notice and Public Meetings

As required by Section 6.12 of the Consent Decree, if EGLE determines there is significant public interest in the Remedial Investigation (RI) Report, proposed Remedial Action Plan (RAP), Response Activity Plans or No Further Action (NFA) Report required by or proposed under the Decree, EGLE will make those reports or Response Activity Plans available for public comment. When EGLE determines that the

proposed plan or report is acceptable for public review, a public notice regarding the availability of those reports or plans will be published, and those reports or plans will be made available for public review and comment for a period of not less than 30 days. The dates and length of the public comment period will be established by EGLE; if EGLE determines there is significant public interest or EGLE receives a request for a public meeting, EGLE will hold a public meeting in accordance with Section 20120d(1) and (2) of the Michigan Natural Resources and Environmental Protection Act (NREPA).

Following the public review, EGLE may refer the report or plan back to Ford for revision to address public comments and EGLE's comments. EGLE will then prepare the final responsiveness summary document that explains the reasons for the selection or approval of a RAP in accordance with the provisions of Sections 20120d(4) and (5) of the NREPA. Upon EGLE's request, Ford will prepare and provide a summary document of the draft public comments.

2.1.1.4 Dedicated 24-Hour Toll-Free Hotline and Email

Ford has established and continues to maintain a dedicated 24-hour telephone hotline and email address to provide yet another way for the community to contact Ford and project representatives with questions and concerns. The 24-hour hotline is (844) 511-1002 and the email is info@FordLivoniaBostonBeaconProject.com.

The hotline is available 24 hours a day and 7 days a week. Both the number and email inbox are maintained and regularly checked so that project inquiries or feedback are quickly addressed. Ford will:

- Provide an initial response within 24-hours of a resident question or issue and will provide a solution within 48-hours;
- Provide EGLE with a written summary of complaints received from the residents on the first of every month.

2.1.1.5 Direct Mailing and Door-to-Door Outreach

Personalized contact with affected community members is provided by several methods, including direct mailing of letters and notices to convey personal (e.g., property specific testing results) or important (e.g., general notices and updates) information about the project. In some cases, door-to-door outreach has been and will continue to be conducted to supplement the direct mailing and other communications methods. In such cases, leave-behind door hangers with information and contact details are developed, printed, and distributed to homes and businesses when Ford or its representatives are unable to talk directly with residents and business owners.

The first mailing and information packet was dated February 3, 2016. That mailing alerted area households and businesses of the environmental work underway and invited them to the February 8, 2016 community meeting. The mailing included a background flyer and listed multiple ways to contact Ford with questions or concerns.

This type of correspondence continues throughout the project to provide updates and additional information. The information is also provided via the project website (however, to respect residents' privacy, no personal or private information is shared by Ford on the website or by other means).

2.1.1.6 Other Community and Stakeholder Engagement

Communications and outreach with local civic, business, school, and neighborhood organizations are an essential activity, as is engagement with local, state, and federal elected officials to share information, listen to questions and concerns, and discuss how Ford and EGLE are addressing those concerns. This type of ongoing outreach includes the mayor, city manager, and city council from Livonia, Wayne County commissioners, state lawmakers and members of Congress who represent the area, the local chamber of commerce, and small business owners and community organizations in the affected area.

2.1.1.7 Value Assurance Program

On April 5, 2019, Ford established a Value Assurance Program (VAP) to protect the value of eligible properties located in the Alden Village Subdivision. The VAP is designed to protect property values throughout the program area, whether a property owner would want to sell their property or continue to own their residential or commercial property. Detailed information concerning the VAP is provided at the following website www.FordLivoniaBostonBeaconProject.com or www.livoniavap.com.

2.1.1.8 Community Liaison

On May 28, 2019, Ford received a letter from EGLE requesting that a full time community liaison be available offsite during the installation of the interim pre-emptive mitigation systems. The purpose of the community liaison is to be the primary point of contact for the residents while the installation of the interim pre-emptive mitigation systems are being installed. The community liaison will document all concerns and communication with the residents. The documentation will be submitted to EGLE on a monthly basis. The community liaison has been in place in the community since June 13, 2019 and will remain in place until all of the interim pre-emptive mitigation systems have been installed.

2.2 Roles and Responsibilities

This Plan summarizes the types of public outreach activities and communications tools that are currently in use and expected to continue throughout the project. EGLE is the lead agency and will provide oversight of all aspects of the project, including public outreach requirements. Ford will comply with all regulatory, technical, and public outreach requirements of the Consent Decree and specifically coordinate with EGLE in support of other public outreach activities as needed.

The table below lists the expected roles and responsibilities for each of the activities described in Section 2.1 of this Plan.

TABLES

Public Outreach Plan

Table 1. Roles and Responsibilities for Public Outreach

Outreach Activity	Ford Responsibility	EGLE Responsibility		
Project Website	Primary role	Oversight role		
Community Meetings	Primary role	Oversight role		
Public Notice	Support role	Primary role		
Public Meetings	Support role	Primary role		
Public Comments	Support role	Primary role		
24-Hotline and Email Contact	Primary role	Oversight role		
Direct Mail	Primary role	Oversight role		
Door-to-Door Outreach	Primary role	Oversight role		

FIGURES

ATTACHMENTS

ATTACHMENT 1

PUBLIC WEBSITE

Home Value Assurance Program Informational Materials EGLE Project Site Report an Issue

Ford Livonia Boston Beacon Project:

Ford Motor Company is testing underground water in the neighborhood east of the Livonia Transmission Plant.

Special Update: As follow-up to recent data received from the ongoing environmental investigation in the neighborhood east of the Livonia Transmission Plant, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) has requested that we install mitigation systems to vent potential vapors from beneath select homes in the neighborhood to mitigate potential vinyl chloride vapor from entering them (See Attachment A – EGLE Letter and Attachment B – Shallow Monitoring Well Data).

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.

We will cooperate with EGLE on its request and will continue to keep you updated on the status

- Letter to Property Owner / Resident February 1, 2019
- Response to MDEQ February 8, 2019
- Response to MDEQ March 11, 2019
- Response to MDEQ March 14, 2019
- Extension Request March 14, 2019
- MDEQ Response to Force Majeure Letter March 21, 2019
- MDEQ Response to Multiple Lines of Evidence Letter March 21, 2019
- MDEQ Response Letter March 26, 2019
- Laboratory Memo April 16, 2019
- Extension Request April 17, 2019
- EGLE Response Letter May 3, 2019
- EGLE Response Letter May 8, 2019
- Response to EGLE May 15, 2019
- Response to EGLE May 17, 2019
- Response to EGLE May 24, 2019
- EGLE Letter May 28, 2019
- Response to EGLE May 31, 2019

6/12/19 update: Dedicated community liaison designated for Ford Livonia Boston Beacon project.

5/2/19 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest progress report to the Informational Materials section of the website.

4/11/19 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest data and test results to the Informational Materials section of the website.

3/5/19 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest data and test results to the Informational Materials section of the website.

2/1/19 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest progress report to the Informational Materials section of the website.

1/22/19 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest data and test results to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

11/30/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest data and test results to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

11/1/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the the latest progress report to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show; 1) no health risk to residents, and 2) no impact to your home's drinking water.

9/18/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest data and test results to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

8/9/18 update: To encourage continued public involvement in the project and to outline how the community can access information, we have added A Public Outreach Plan to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

Special Update: As part of our ongoing effort to engage and inform the community and others interested in the Livonia Transmission Project, a legal notice (pictured to the right) was published in the Detroit Free Press on Sunday, July 22, 2018. The purpose of the legal notice is to inform the community that the Michigan Department of Environmental Quality (MDEQ) is accepting public written comments for the Response Activity Plans submitted to the MDEQ on April 13, 2018. These Response Activity Plans were previously posted to this website. In addition, a public meeting will be held on August 20, 2018 at Burton



The MDEQ has made available draft Approval with Modification letters at their Southeast Michigan office and the Livonia Public Library. To further facilitate communication,

Manor located at 27777 Schoolcraft Road, Livonia, Michigan from 6 to 9 PM.

these draft response comment letters have been added to the Information Materials section of this website.

- Response Activity Plan Vapor Intrusion Evaluation April 13, 2018
- Response Activity Plan Remedial Investigation April 13, 2018

8/t/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest progress report to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

7/26/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added a document to the Informational Materials section of the website:

 Response to MDEQ July 2, 2018 Request for Conceptual Site Model (CSM) - July 26, 2018

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

6/19/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest data and test results to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

4/3o/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest progress report to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show; 1) no health risk to residents, and 2) no impact to your home's drinking water.

4/18/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added three documents to the Informational Materials section of the website:

- Response to MDEQ Comments on the Disapproval of the Response Activity Plan— April 13, 2018
- Response Activity Plan Vapor Intrusion Evaluation April 13, 2018
- Response Activity Plan Remedial Investigation April 13, 2018

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

1/31/18 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added the latest progress report to the Informational Materials section of the website.

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

12/14/17 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added three documents to the Informational Materials section of the website:

- Response Activity Plan Target Detection Limit November 20, 2017
- Response to MDEQ CSM comments December 12, 2017
- Response Activity Plan Remedial Investigation and Vapor Intrusion Assessment –
 December 13, 2017

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

12/06/17 update: As part of our ongoing work to address the issue and to keep the community updated on our progress, we have added three documents to the Informational Materials section of the website:

- Conceptual Site Model (CSM) report August 25, 2017
- CSM response from MDEQ November 13, 2017
- Progress Report November 21, 2017

Importantly, all samples collected to date continue to show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

7/25/17 update: Per the July 21, 2017 consent decree with the Michigan Department of Environmental Quality, we will continue our work to address the issue. Importantly, all samples collected to date show: 1) no health risk to residents, and 2) no impact to your home's drinking water.

7/14/17 update: Per the previous April 25 and May 11 updates, additional underground water testing and soil vapor monitoring results have been completed and shared with residents as part of our ongoing commitment to keep our neighbors informed. All information and samples collected to date continue to show there are no health risks to residents, and importantly, there is no impact to your home's drinking water. Results and maps can also be found in the Information Materials section of the website.

5/11/17 update: As part of our ongoing monitoring work, we will install three additional wells in right-of-ways on Standish, Wadsworth and Beacon streets. An updated map highlighting the new well locations can be found in the Information Materials section of the website. We will complete this work the week of May 15.

4/25/17 update: Ford is continuing to work closely with the Michigan Department of Environmental Quality to monitor groundwater impacts east of the Livonia Transmission Plant. A groundwater treatment system was installed in March 2017 to prevent migration of groundwater impacts from the Ford Livonia property. As part of the ongoing monitoring efforts in the neighborhood and commitment to the community, residents and the environment, Ford will install permanent groundwater monitoring wells and temporary soil vapor monitoring points within the neighborhood east of the Livonia Transmission Plant in April and May. Their purpose will be to further evaluate vinyl chloride in groundwater and soil vapor. A map showing their locations is in the Informational Materials section of the website. We will continue to keep the neighborhood, City of Livonia and MDEQ up to date on our progress.

What is happening?

While renovating the Livonia Transmission Plant, we discovered vinyl chloride in underground water on the east side of the plant. Ford is investigating the issue to determine the potentially affected area, and verify if any action is required.

Importantly, all samples collected to date show no health risk to residents, and drinking water is not at risk.

Crews worked on Belden Court, and Beacon, Boston Post and Wadsworth streets.

Additional testing has been completed.

Is there a risk or impact to me and my family?

All information and samples collected to date continue to show no health risk to residents.

Area residents should all be connected to the city of Livonia's water source, which is from Detroit and now known as the Great Lakes Water Authority, so there is no impact to your home's drinking water.

On-site environmental and safety personnel oversaw and managed the work. Ford's top priority was to ensure safe operations and protect residents and bystanders.

Updates

A groundwater capture and treatment system installed in March 2017 continues to operate and prevent migration of groundwater impacts from the Ford Livonia property.

Additionally, as part of the ongoing monitoring efforts in the neighborhood and commitment to the community, residents and the environment, Ford also installed permanent groundwater monitoring wells and temporary soil vapor monitoring points within the neighborhood east of the Livonia Transmission Plant in April and May of 2017. Their purpose is to further evaluate vinyl chloride in groundwater and soil vapor. The latest data and results from the sampling of these monitoring wells and points continue to show no health risks to residents, and importantly, no impact to your home's drinking water. This remains consistent with all previous testing information.

Offsite groundwater monitoring will be conducted quarterly to monitor progress and results will continue to be shared with the community.

We will continue to keep the neighborhood, City of Livonia and the Michigan Department of Environmental Quality up-to-date on our progress.

In the meantime, please don't hesitate to reach out with any questions.

Report an Issue

If you have any issues or concerns about this project or regarding mitigation installation please contact us using one of the methods below:

- 24-hour toll-free hotline (844) 511-1002
- Send us a message here
- · Or email us directly at info@fordlivoniabostonbeaconproject.com
- Community liaison Theresa Olechiw

Your name:

Please	describe your issue or	concern in the bo	ox/below:		
					-
Formo	e information, call our	24-hour toll-free h	notline at (844) 511-10	007	

ATTACHMENT 2

FEBRUARY 3, 2016 LETTER TO PROPERTY OWNERS AND RESIDENTS

February 3, 2016

Re: Ford Livonia Transmission Plant Groundwater Testing Project

Dear Property Owner/Resident:

As a major company and employer who is proud to be part of the Livonia community and strives to be a good neighbor, we wanted to make sure you knew about some testing of underground water that we will be conducting in your neighborhood in the coming weeks.

This work is simply in an abundance of caution after a chemical – vinyl chloride – from past, historic manufacturing processes was identified in underground water (at depths of seven feet and greater) while making upgrades at the plant. Ford will be aggressive in investigating this and taking steps to mitigate, if needed, to continue our deep commitment and track record of being environmentally responsible and sustainable.

There is no anticipated risk to you or your family. Most importantly, if you receive a water bill from the City of Livonia, your drinking water source is Detroit and the Great Lakes Water Authority and there is **no impact to your home's drinking water**. Any resident who has a personal well on their property is asked to call our toll-free number at 1-844-511-1002 or send an email to info@FordLivoniaBostonBeaconProject.com. The affected underground water being tested is located seven feet or more below the surface. Additionally, all information and samples collected to date **show no health risk to residents**.

We have been working closely with the city of Livonia to ensure the utmost transparency and collaboration. These activities also meet the approval and requirements of state regulatory authorities.

This testing is specifically slated to be conducted along the right of way on Belden Court, and Beacon and Boston Post and Wadsworth streets between the hours of 8 a.m. and 5 p.m., starting about Tuesday, Feb. 9 and taking approximately two weeks.

It is important to note all testing will take place near the street on the public right of way and not on private property. All efforts will be made to ensure this testing is done quickly and effectively with minimal impact to you and your fellow residents. This includes ensuring safe operations and protecting you and any bystanders and minimizing disturbance of grass and lawn areas, which will be restored to previous conditions after the testing is completed. Please do not approach the machinery operator.

To keep you informed of this project and all related testing work, please see the enclosed flyer. In addition, we will be hosting a **community informational meeting** that you can stop by anytime between the hours of **5 p.m. and 8 p.m.** on **Monday**, **Feb. 8** at the **Livonia Transmission Plant's**

Automatic Transmission Operations building (ATO) in the east cafeteria. Please use the Gate 5 entrance on Plymouth Road. The address is 36200 Plymouth Road, in Livonia (see map below). Ford company and environmental experts will be on hand to answer any questions or concerns you may have. Free child care will also be provided.

Additionally, you can call our toll-free number at 1-844-511-1002 or send an email to info@FordLivoniaBostonBeaconProject.com, with questions at any time. You may also visit www.FordLivoniaBostonBeaconProject.com to stay up-to-date on the latest information regarding this project.

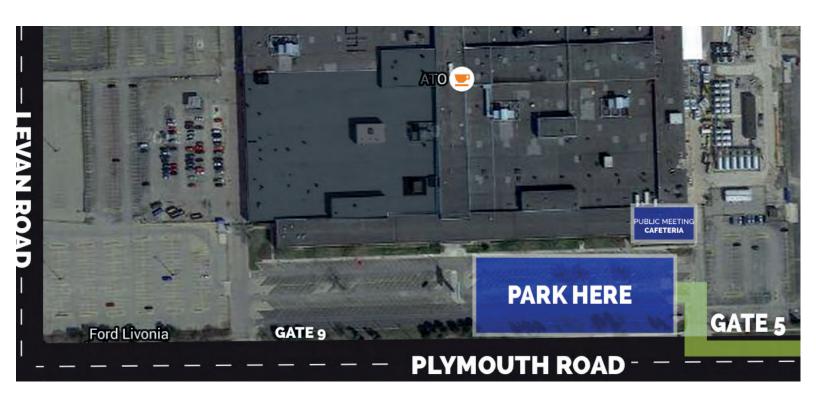
Ford will continue to keep you informed and about this work and progress, and we look forward to answering any questions you may have and ensuring our continued commitment to a thriving, safe Livonia.

Very truly yours,

Robert "Bob" A. Groden, Plant Manager

Rober a. Groden

The Ford Motor Company – Livonia Transmission Plant





FORD LIVONIA TRANSMISSION PLANT:

GROUNDWATER TESTING PROJECT NOTICE

WHAT IS HAPPENING?

- In the coming weeks, Ford Motor Company will be testing underground water in your neighborhood, east of the company's Livonia Transmission Plant.
- In the course of making upgrades at the Livonia plant, Ford identified the presence of vinyl chloride in underground water several feet under the surface from past manufacturing processes. To appropriately address the issue and protect the environment, the company needs to know more about

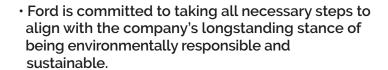


- Residents are likely to see crews working near the street on Belden Court, and Beacon, Boston Post and Wadsworth streets. These crews – from the environmental engineering firm Arcadis of Michigan – will be using drilling rigs like the one pictured here to take underground water samples for testing.
- This work is expected to begin about Tuesday,
 Feb. 9, and take approximately two weeks.
 Hours of operation will be between 8 a.m. to
 5 p.m. to help ensure minimal impact to residents.
- All testing results from this project will be shared with the public.
- Thank you for your patience as the crews do everything to make sure this work is handled quickly and effectively.

IS THERE A RISK OR IMPACT TO ME AND MY FAMILY?

- All information and samples collected to date show no health risk to residents.
 - · Area residents who receive
 City of Livonia water bills are
 connected to Livonia's
 watersource, which is from
 Detroit and now known as the
 Great Lakes Water Authority,
 so there is no impact to your
 home's drinking water.
 (NOTE: Any resident who
 has a personal well on their
 property is asked to contact
 the number below.)

Feb. 2016



- With on-site environmental and safety personnel to oversee and manage the work, Ford's top priority will be to ensure safe operations and protect residents and bystanders.
- All testing will take place on public right of ways and not private property. Every effort will be made to minimize disturbing grass and lawn areas. When the testing is completed, all surfaces will be restored to previous conditions as weather permits.
- For your own safety and the safety of the drill operator, residents should stay at least five feet from the drilling equipment. This area will be marked with traffic cones and caution tape.

HOW CAN I GET MORE INFORMATION?



For more project information or any questions, please call our toll-free number at 1-844-511-1002, or email info@FordLivoniaBostonBeaconProject.com. In addition, you can visit our website at www.FordLivoniaBostonBeaconProject.com.



Informational Public Meeting:

Monday, Feb. 8, Stop by anytime between 5 p.m. and 8 p.m. at the Livonia Transmission Plant's Automatic Transmission Operations building in the east cafeteria. Please use the Gate 5 entrance on Plymouth Rd. The address is 36200 Plymouth Road, in Livonia. Free child care provided.





ATTACHMENT 3

EXAMPLE 2016 DOOR HANGER











FORD LIVONIA TRANSMISSION PLANT:

GROUNDWATER TESTING PROJECT NOTICE Feb. 2016

REMINDER:

Ford Motor Company will be testing underground water at seven feet below the surface, or deeper, in your neighborhood beginning about Tuesday, Feb. 9, 2016, and taking approximately 2 weeks to complete.

HOURS OF OPERATION:

Approximately 8 a.m. to 5 p.m.

IT IS IMPORTANT TO KNOW:

- All information and samples collected to date shows no known risk to residents and no impact to your home's drinking water.
- Your health and safety are Ford's top priority during this work. All testing will be performed by qualified personnel and the results of this project will be shared with you.
- Ford is committed to taking all necessary steps aligned with the company's longstanding stance of being environmentally responsible and sustainable.

For more information or any questions, call our toll-free number at 1-844-511-1002, or email info@FordLivoniaBostonBeaconProject.com. Also, stop by our informational public meeting anytime between 5 p.m. and 8 p.m., Monday, Feb. 8 at the Livonia Transmission Plant's Automatic Transmission Operations building (ATO) in the east cafeteria. Please use the Gate 5 entrance on Plymouth Road. Address is 36200 Plymouth Road, Livonia, MI 48150. Free child care provided.

www.FordLivoniaBostonBeaconProject.com.









ATTACHMENT 4

MARCH 14, 2016 LETTER TO PROPERTY OWNERS AND RESIDENTS



Ford Motor Company Livonia Transmission Plant 36200 Plymouth Road Livonia, Michigan 48150

March 14, 2016

Re: Update on Ford Livonia Transmission Plant Groundwater Testing Project

Dear Property Owner/Resident:

As follow-up to our February 8 meeting at the Livonia Transmission Plant, we wanted to provide you with an update on the underground water testing in the neighborhood.

As you know, we have been drilling temporary borings in street right-of-ways to identify where vinyl chloride migration stops east of the Livonia Transmission Plant. We have now completed the initial phase of sampling and of all of the results shown on **Figure 1**, only two locations require follow-up investigation.

All information and samples collected to date show no health risk to residents and there is **no impact to your home's drinking water**. We found two borings with levels above the Michigan Department of Environmental Quality's criterion for drinking water at 2 parts-per-billion (ppb).

- HPT-80, located at the north end of Boston Post Street, had levels of 9 ppb 12-15 feet below ground, and
- HPT-97, located just north of the west end of Standish Street, had levels of 3 ppb 16-19 feet below ground.

We continue to work closely with the City of Livonia and MDEQ on this project. Both parties are aware of our findings and our plan to continue testing near both locations as shown on **Figure 2** and then assess and communicate next steps.

If you have questions, please call our toll-free number at 1-844-511-1002 or send an email to info@FordLivoniaBostonBeaconProject.com.

We will continue to keep you informed about our work. Please visit our website, www.FordLivoniaBostonBeaconProject.com, to stay up-to-date on the latest information about the project.

Best,

Robert "Bob" A. Groden, Plant Manager

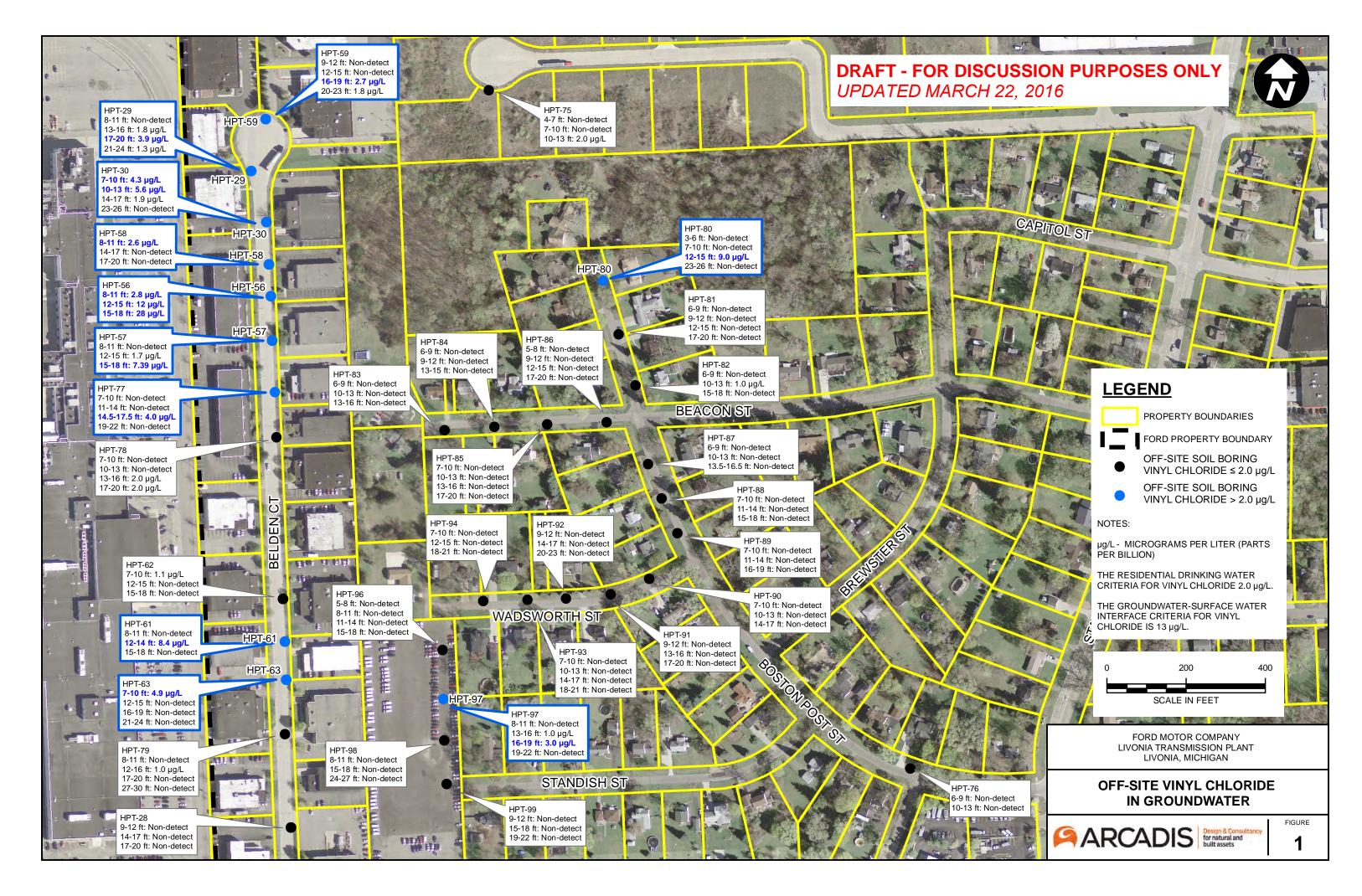
Ford Motor Company – Livonia Transmission Plant

Then a. Groden

Attachments: Figure 1 and Figure 2

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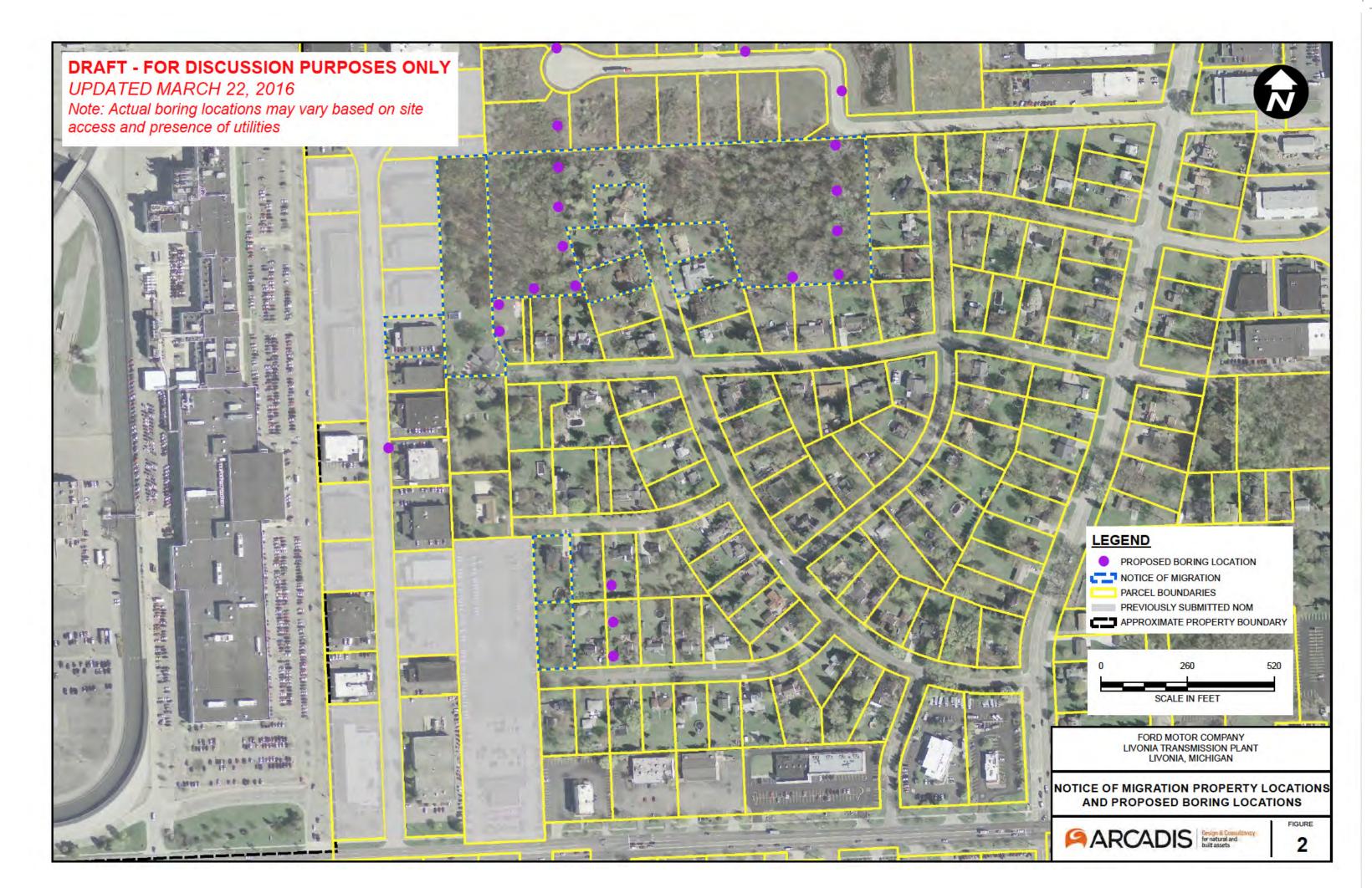


















ATTACHMENT 5

JUNE 27, 2016 LETTER TO PROPERTY OWNERS AND RESIDENTS



Ford Motor Company Livonia Transmission Plant 36200 Plymouth Road Livonia, Michigan 48150

June 27, 2016

Re: Update on Ford Livonia Transmission Plant Groundwater Testing Project

Dear Property Owner/Resident:

In follow-up to our February 8 meeting at the Livonia Transmission Plant and our subsequent March 14, 2016 letter, we wanted to provide you with an update on the underground water testing in the neighborhood.

As you know, we have been drilling temporary borings on a few private properties and in street right-of-ways to identify where the vinyl chloride migration stops east of the Livonia Transmission Plant. The groundwater data collected to date are shown on **Figure 1**. As a result, we are going to continue our work to determine the extent of the affected areas and next steps.

All information and samples collected to date continue to show there is no health risk to residents, and there is **no impact to your home's drinking water**. During this most recent sampling, nine borings indicated vinyl chloride levels above MDEQ's most stringent criterion for drinking water at 2 parts-per-billion (ppb). However, the level of vinyl chloride detected to the east dropped from 9 ppb detected at one testing location (HPT-80) on Boston Post Road to 5.9 ppb detected at two other testing location (HPT-116 and HPT- 118) on the vacant property south of Rosati Drive.

We plan to continue testing near the locations shown on **Figure 2** and continue to work closely with the City of Livonia and MDEQ on this project. We will keep you informed as we continue our efforts. Both parties are aware of our findings and our plan to continue testing and then assess and communicate the next steps.

As always, if you have questions, please call our toll-free number at 1-844-511-1002 or send an email to info@FordLivoniaBostonBeaconProject.com.

We will continue to keep you informed about our work. Please visit our website www.FordLivoniaBostonBeaconProject.com to stay up-to-date on the latest information about this project.

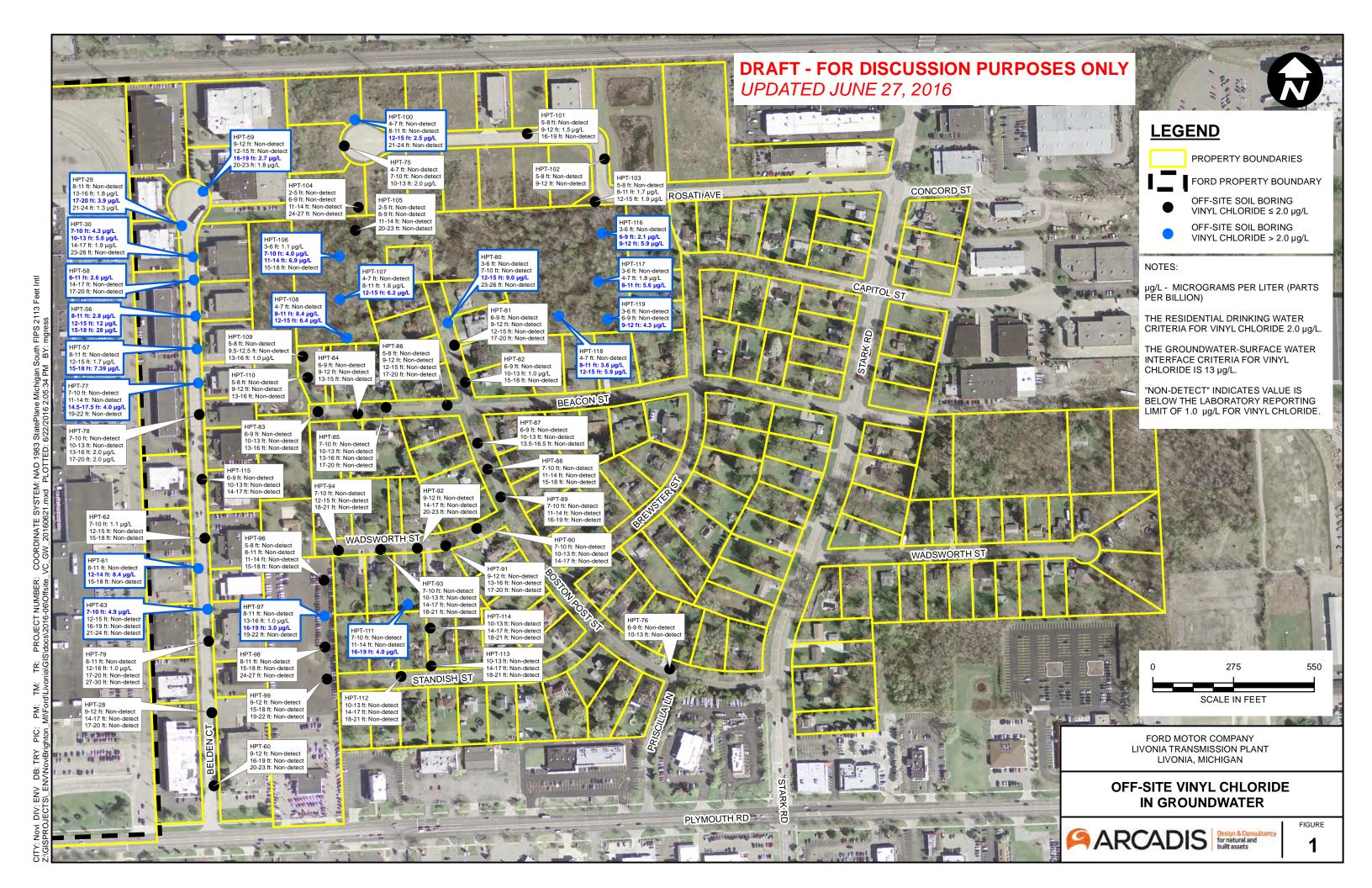
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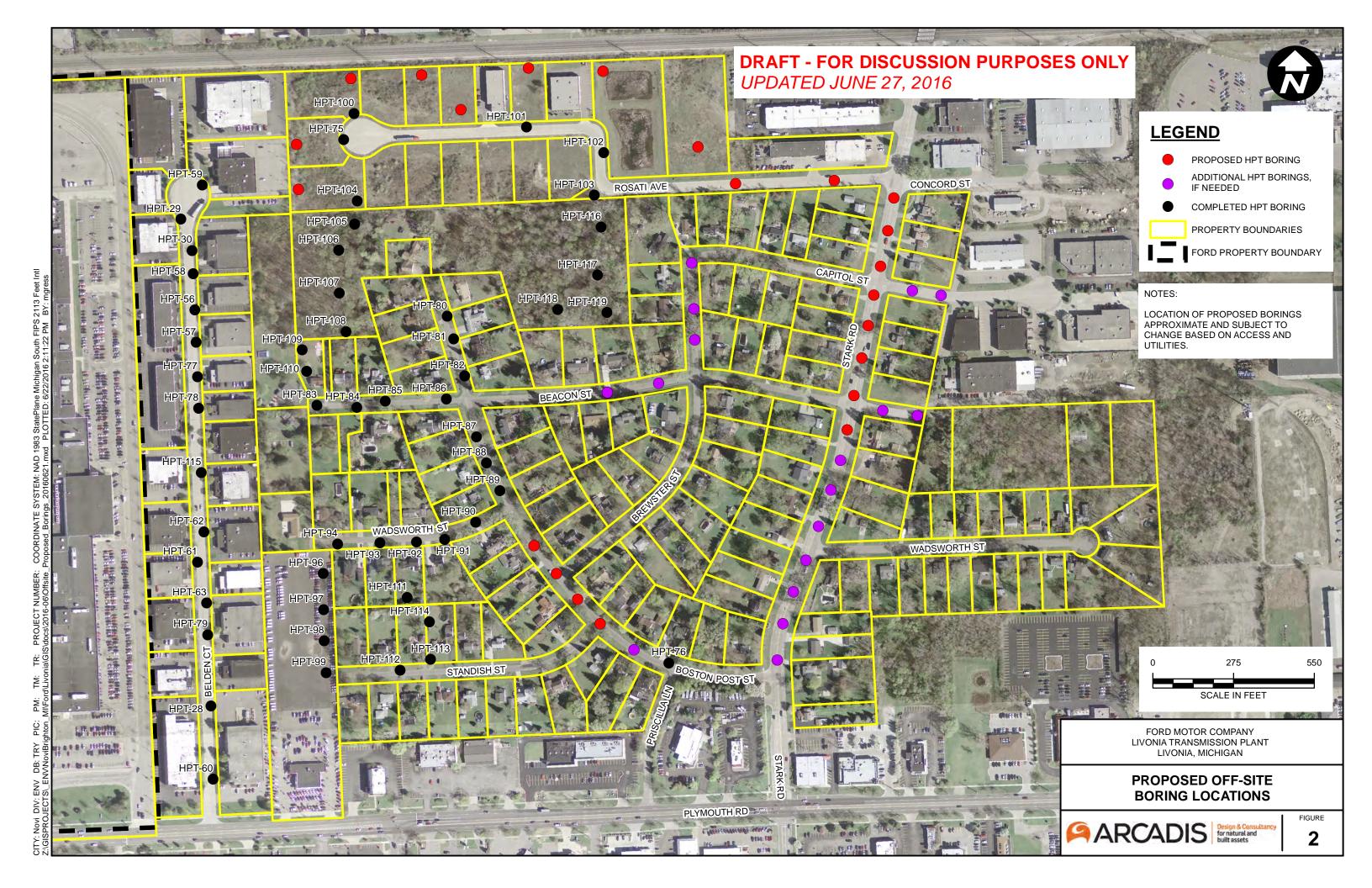
Robert A. Groden, Plant Manager

Ford Motor Company – Livonia Transmission Plant

a. Groden

Attachments: Figure 1 and Figure 2





ATTACHMENT 6 SEPTEMBER 9, 2016 LETTER TO PROPERTY OWNERS AND RESIDENTS



Ford Motor Company Livonia Transmission Plant 36200 Plymouth Road Livonia, Michigan 48150

September 9, 2016

Re: Update on Ford Livonia Transmission Plant Groundwater Testing Project

Dear Property Owner/Resident:

This letter is to provide you with information on the underground water testing conducted by Ford at the east of the Livonia Transmission plant.

All information and samples collected to date continue to show there is no health risk to residents, and there is **no impact to your home's drinking water**.

In July 2016, Ford Motor Company drilled additional temporary borings to test groundwater and to identify where the vinyl chloride migration stops east of the Livonia Transmission Plan. The boring locations and groundwater data collected to date is shown on **Figure 1**. The data indicates that the extent of the vinyl chloride has successfully been defined. As a result, Ford will continue to apprise the City of Livonia and work closely with the MDEQ on this project to review and take the necessary next steps.

As always, if you have questions, please call our toll-free number at 1-844-511-1002 or send an email to info@FordLivoniaBostonBeaconProject.com.

We will continue to keep you informed about our work. Please visit our website www.FordLivoniaBostonBeaconProject.com to stay up-to-date on the latest information about this project.

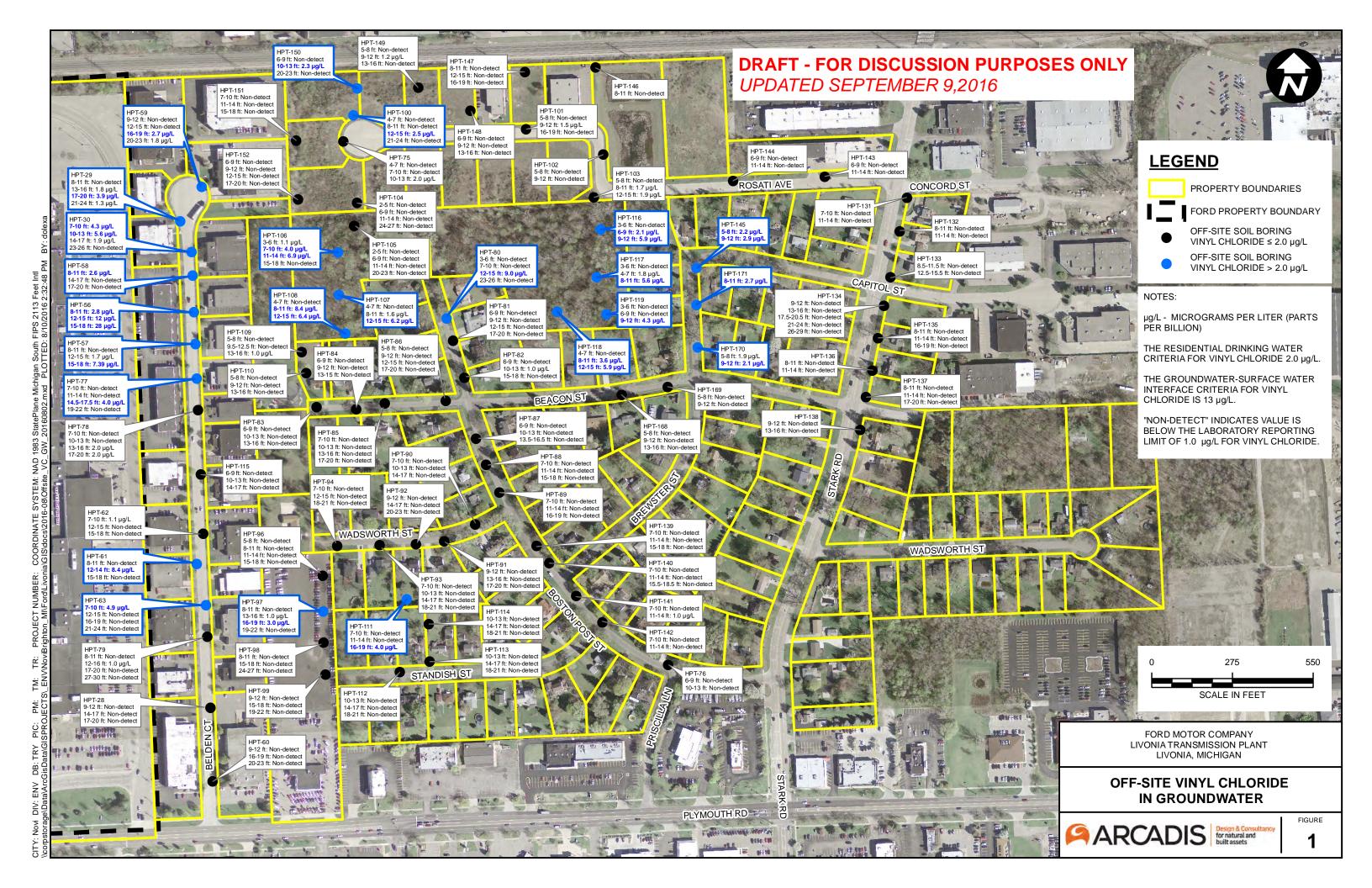
Best,

Robert A. Groden, Plant Manager

Ford Motor Company – Livonia Transmission Plant

when a. Groden

Attachments: Figure 1



ATTACHMENT 7

APRIL 25, 2017 LETTER TO PROPERTY OWNERS AND RESIDENTS



Ford Motor Company Livonia Transmission Plant 36200 Plymouth Road Livonia, Michigan 48150

April 25, 2017

Re: Update on Ford Livonia Transmission Plant Groundwater Testing Project

Dear Property Owner/Resident:

This letter is to provide you with information on the underground water testing conducted by Ford east of the Livonia Transmission plant.

All information and samples collected to date continue to show there are no health risks to residents, and there is **no impact to your home's drinking water**.

In April and May 2017, Ford Motor Company will install permanent groundwater monitoring wells and temporary soil vapor monitoring points within neighborhood rights-of-way east of the Livonia Transmission Plant to further evaluate vinyl chloride in groundwater and soil vapor, respectively. The monitoring well and soil vapor monitoring point locations are shown on **Figure 1**.

The data collected to date indicates that the extent of the vinyl chloride in groundwater has successfully been defined. As a result, Ford will continue to apprise the City of Livonia and work closely with the MDEQ on this project to review and take the necessary next steps outlined above.

Additionally, a groundwater capture and treatment system has been installed and has been operational since March 17, 2017 on the Livonia Transmission Plant property. This capture and treatment system is addressing the impacts and will continue to operate until approved for shutdown by the Michigan Department of Environmental Quality.

As always, if you have questions, please call our toll-free number at 1-844-511-1002 or send an email to info@FordLivoniaBostonBeaconProject.com.

We will continue to keep you informed about our work. Please visit our website www.FordLivoniaBostonBeaconProject.com to stay up-to-date on the latest information about this project.

Best.

Robert A. Groden, Plant Manager

Ford Motor Company – Livonia Transmission Plant

Rober a. Groden

Attachments: Figure 1 - Proposed Monitoring Well and Soil Vapor Monitoring Point Locations

DRAFT - FOR DISCUSSION PURPOSES ONLY LEGEND PROPERTY BOUNDARY FORD PROPERTY BOUNDARY • PROPOSED MONITORING WELL PROPOSED MONITORING WELL PENDING OWNER APPROVAL PROPOSED SOIL VAPOR MONITORING POINT LOCATION PROPOSED SOIL VAPOR MONITORING POINT LOCATION PENDING OWNER APPROVAL 550 SCALE IN FEET FORD MOTOR COMPANY LIVONIA TRANSMISSION PLANT LIVONIA, MICHIGAN PROPOSED MONITORING WELL AND SOIL VAPOR MONITORING POINT LOCATIONS

PLYMOUTH RD

FIGURE

1

ARCADIS for natural and built assets

ATTACHMENT 8

JULY 14, 2017 LETTER TO PROPERTY OWNERS AND RESIDENTS



Ford Motor Company Livonia Transmission Plant 36200 Plymouth Road Livonia, Michigan 48150

July 14, 2017

Re: Update on Ford Livonia Transmission Plant Groundwater Testing Project

Dear Property Owner/Resident:

This letter is to provide you with information on the underground water testing and soil vapor monitoring work conducted by Ford east of the Livonia Transmission plant. All information and samples collected to date continue to show there are no health risks to residents, and importantly, there is **no impact to your home's drinking water**.

Underground Water Testing

Ford installed 20 permanent groundwater monitoring wells east of the Livonia Transmission plant. As shown on **Off-Site Groundwater Monitoring Figure 1**, vinyl chloride results are consistent with prior sampling results and still indicate the extent of vinyl chloride in groundwater has successfully been defined and there is no impact to drinking water in the area.

At MDEQ's request, Ford also analyzed groundwater for trichloroethene. As shown on **Off-Site Groundwater Monitoring Figure 2**, no trichloroethene was detected.

Ford continues to operate a groundwater capture and treatment system on the Livonia Transmission plant property which is addressing vinyl chloride impacts. Offsite groundwater monitoring will be conducted quarterly to monitor progress and results will continue to be shared with the community.

Soil Vapor Monitoring

Ford installed 43 temporary soil vapor monitoring points east of the Livonia Transmission plant. As shown on **Off-Site Vapor Intrusion Assessment Figures 1 and 2**, vinyl chloride and trichloroethene results are all below MDEQ action levels.

To provide additional data, Ford also analyzed groundwater beneath the soil vapor monitoring points located on residential properties. As shown on **Off-Site Vapor Intrusion Assessment Figures 3 and 4**, the results are consistent with groundwater monitoring results described above and indicate the extent of vinyl chloride in groundwater has successfully been defined and there is no impact to drinking water in the area.

Ford will continue to apprise the City of Livonia and work closely with the MDEQ on this project. As always, if you have questions, please call our toll-free number at 1-844-511-1002 or send an email to info@FordLivoniaBostonBeaconProject.com.

We will continue to keep you informed about our work. Please visit our website www.FordLivoniaBostonBeaconProject.com to stay up-to-date on the latest information about this project.

Best,

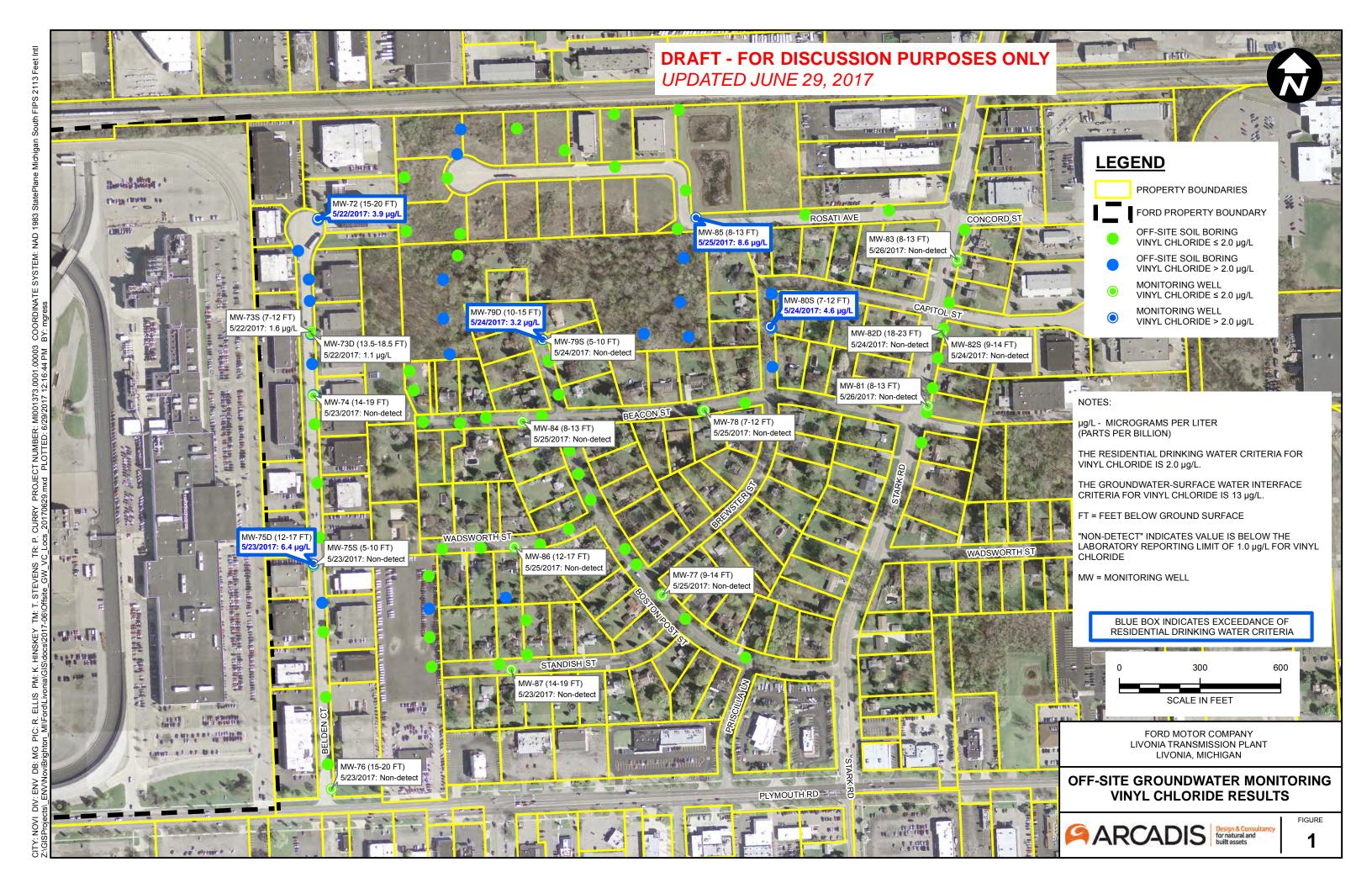
Robert A. Groden, Plant Manager

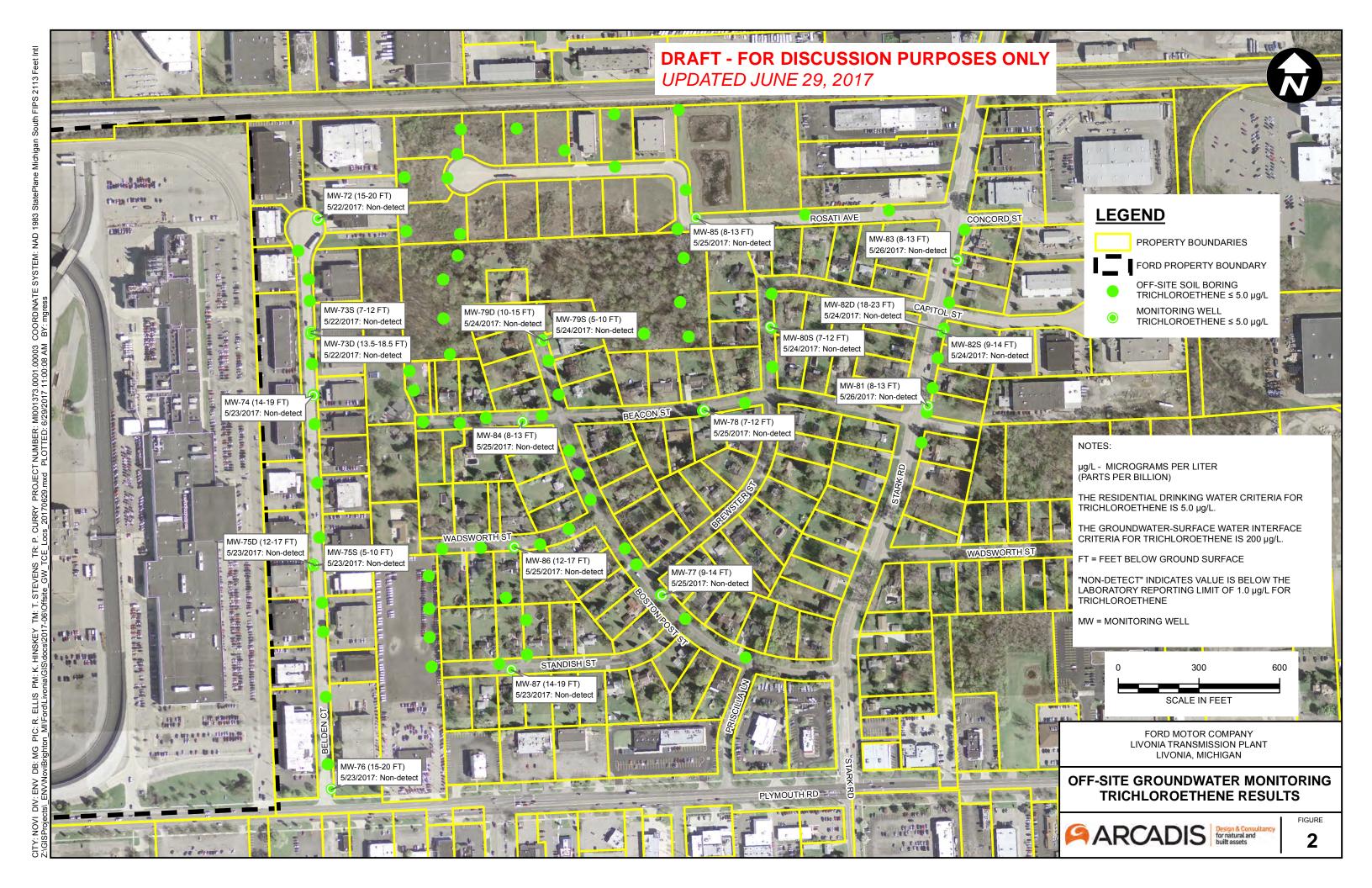
Ford Motor Company - Livonia Transmission Plant

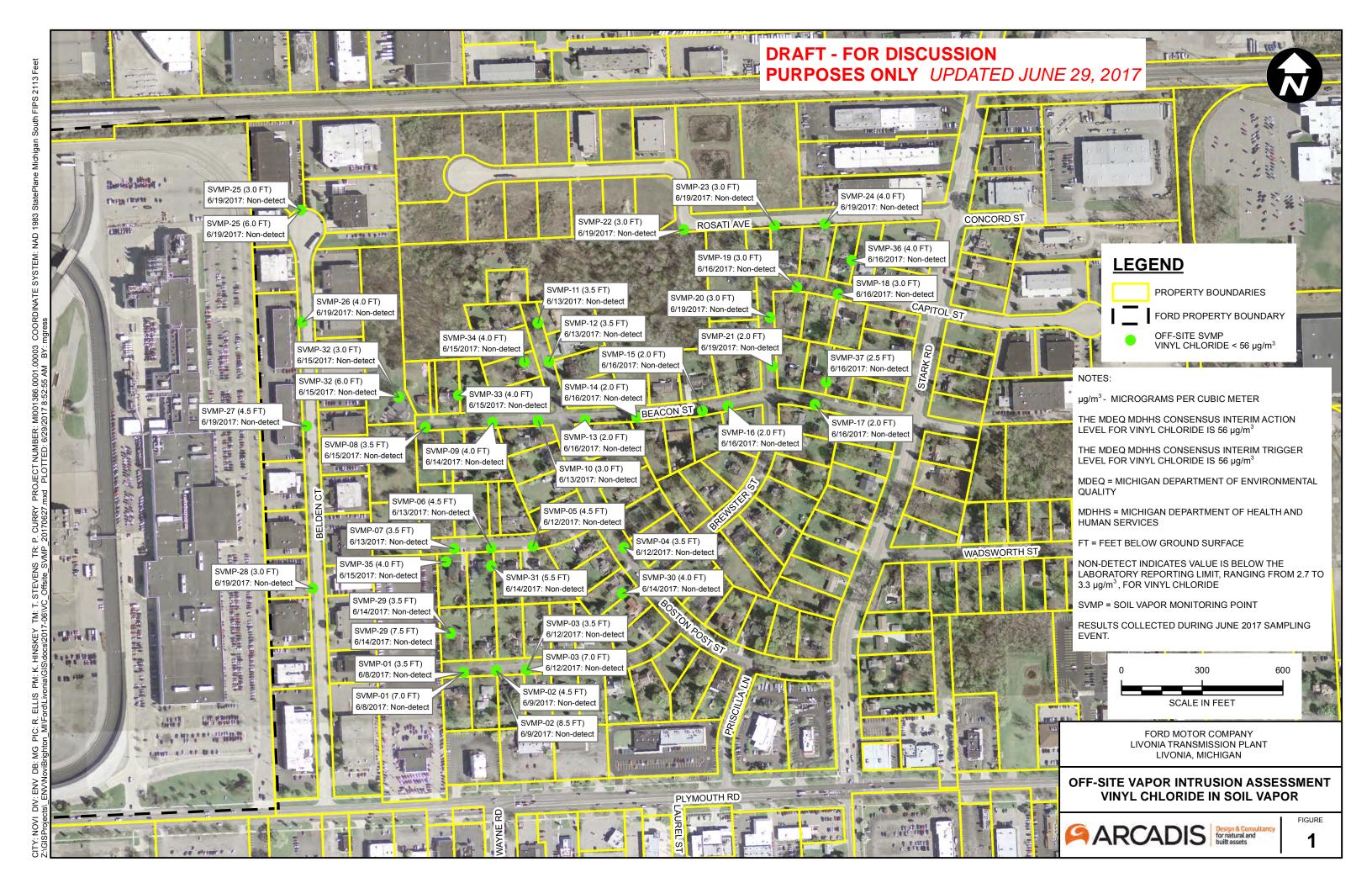
John a. Groden

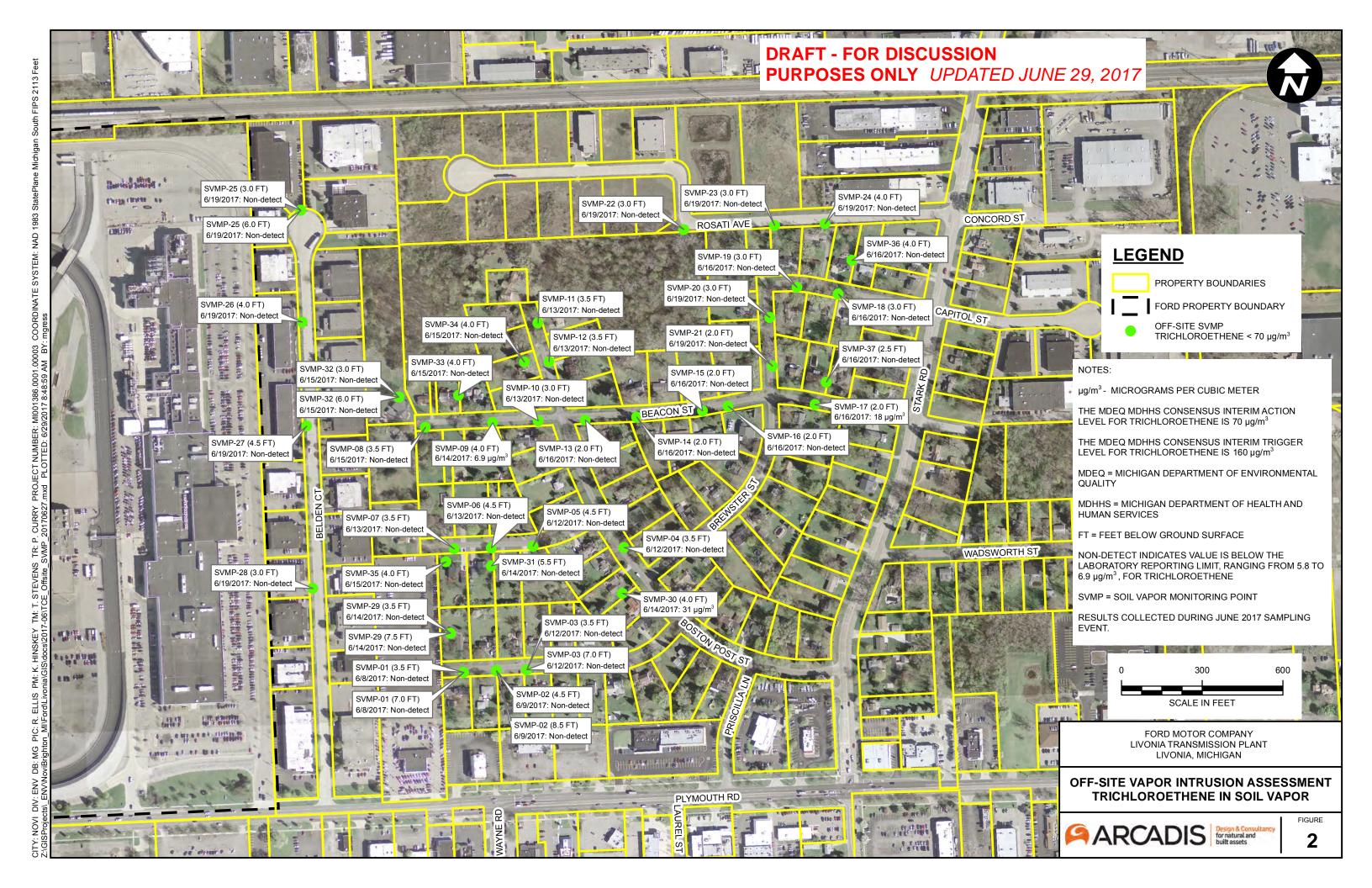
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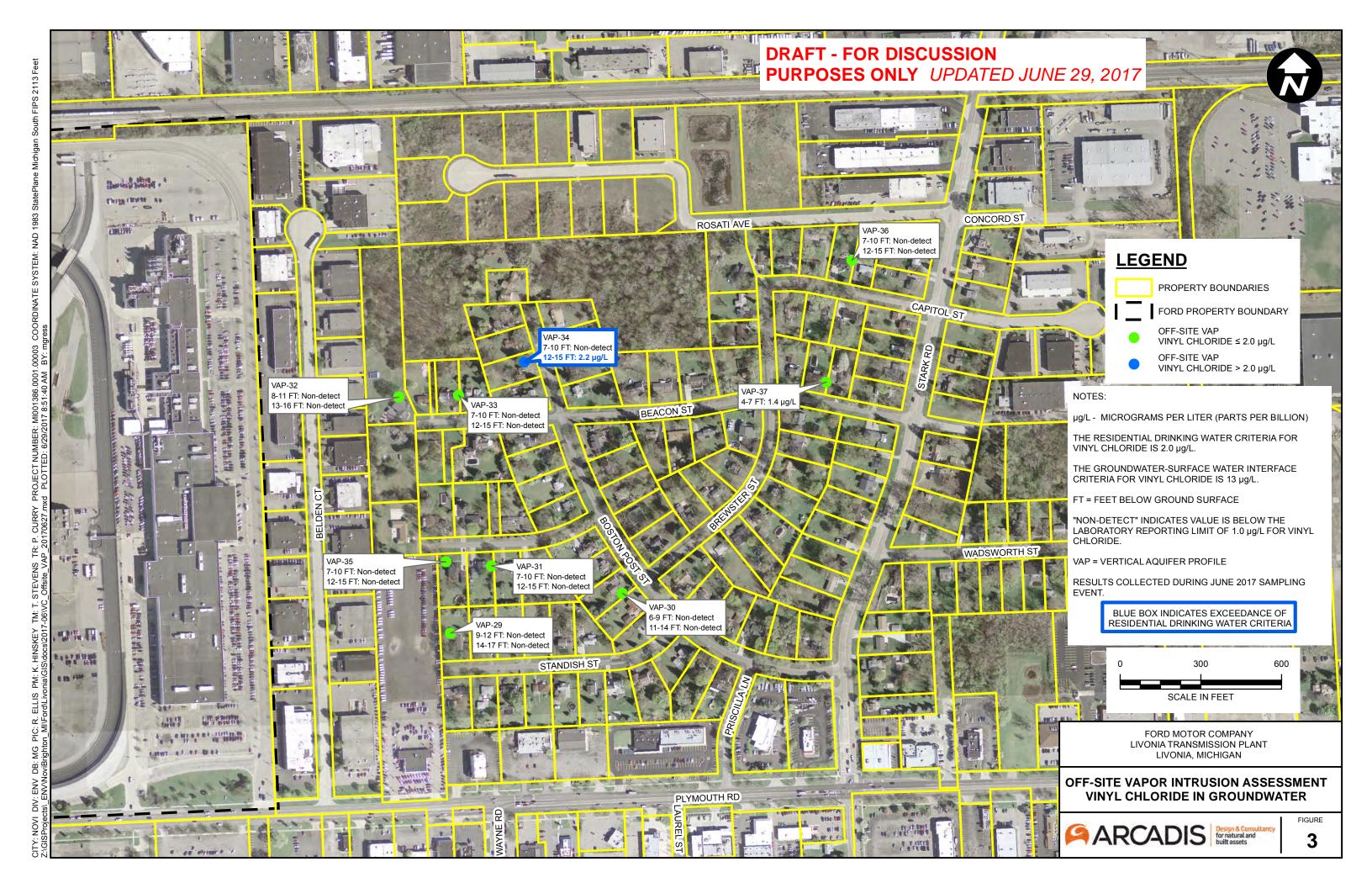
Off-Site Groundwater Monitoring Figures 1 and 2 Off-Site Vapor Intrusion Assessment Figures 1, 2, 3, and 4











ATTACHMENT 9

FEBRUARY 1, 2019 LETTER TO PROPERTY OWNERS AND RESIDENTS



Environmental Quality Office Sustainability, Environment & Safety Engineering Ford Motor Company Fairlane Plaza North 290 Town Center Drive, Suite 800 Dearborn, MI 48126

February 1, 2019

Re: Follow-up Information Regarding Environmental Investigation Neighborhood East of Livonia Transmission Plant, Livonia, Michigan

Dear Property Owner / Resident:

As follow-up to recent data received from the ongoing environmental investigation in the neighborhood east of the Livonia Transmission Plant, the Michigan Department of Environmental Quality (MDEQ) has requested that we install mitigation systems to vent potential vapors from beneath select homes in the neighborhood to mitigate potential vinyl chloride vapor from entering them (See Attachment A – MDEQ Letter and Attachment B – Shallow Monitoring Well Data).

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.

We will cooperate with MDEQ on its request and will contact you in the near future about next steps.

Sincerely.

Todd M. Walton

Manager, Global Site Assessment & Remediation

Attachment A MDEQ Letter

Attachment B Shallow Monitoring Well Data

ATTACHMENT A MDEQ FEBRUARY 1, 2019 LETTER



STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY SOUTHEAST MICHIGAN DISTRICT OFFICE



February 1, 2019

Mr. Todd M. Walton Ford Motor Company Fairlane Plaza North, 8F 290 Town Center Drive-Dearborn, Michigan 48126

Dear Mr. Walton:

SUBJECT: Ford Livonia Transmission Plant

36200 Plymouth Road, Livonia, Wayne County, Michigan

MDEQ Site ID No. 82002970

The Michigan Department of Environmental Quality (MDEQ), Remediation and Redevelopment Division (RRD), requested shallow groundwater wells intersecting the top of the groundwater table be installed to evaluate the volatilization to indoor air pathway (VIAP) as a part of the implementation of the "Response Activity Plan – Vapor Intrusion Evaluation" (Plan) approved with modifications on August 30, 2018, as part of the July 27, 2017 Consent Decree between the MDEQ and Ford Motor Company. On December 13, 2018, Ford Motor Company submitted a map to the MDEQ identifying the location of shallow monitor wells to assess the VIAP and notified the MDEQ that these wells were being installed. The MDEQ received data showing detections of vinyl chloride above the target detection level (TDL) of 1 part per billion (ppb) between January 18, 2019 and January 25, 2019 for these specific wells:

Well ID	Vinyl Chloride (ppb)
MW-80SR	1.4
MW-73SR	1.7
MW-85S	7.8
MW-102	1.6
MW-1235	4.6
MW-115S	2.7
MW-1275	1.5
MW-1305	1.1

These detections of vinyl chloride represent a groundwater plume and this plume must be delineated using groundwater data from shallow monitor wells that have data below the TDL of 1 ppb. Any residential structures within this plume and within 100 feet of this plume will require mitigation for the residential structures if they are above the applicable criteria as described below. This is a requirement under Section 6.6, Interim Response Activities (d)(iii) of the Consent Decree. Note that Attachment D of the Consent Decree incorrectly included Time-Sensitive Recommended Interim Action Screening Levels for groundwater, soil and soil gas in

addition to indoor air. Time-Sensitive Recommended Interim Action Screening Levels are applicable for indoor air only and are used to evaluate indoor air data to determine if structures are inhabitable based on contaminant concentrations. Therefore, the site-specific volatilization to indoor air criteria for groundwater, soil, and soil gas calculated by the MDEQ Toxicology Unit dated August 7, 2017 and October 30, 2018 (different property uses, building types, and depths to groundwater within each) are the correct criteria to use for evaluation of data and will be used by the MDEQ.

In accordance with the Part 201 of Act 451 of 1994, Environmental Remediation, of Natural Resources and Environmental Protection Act, Section 20120a (10), when the TDL for a hazardous substance is greater than the developed cleanup criterion, the criterion is the TDL. Therefore, the site-specific volatilization to indoor air criteria for groundwater for residential homes with basements defaults to the TDL of 1 ppb per Part 201, Section 20120a (10). Site specific volatilization to indoor air criteria for groundwater for homes with a slab-on-grade or crawl spaces with groundwater depths ranging from surface level to 1.18 meters below ground surface defaults to the TDL of 1 ppb per Part 201, Section 20120a (10), and with groundwater depths deeper than 1.18 meters below ground surface is 1.4 ppb. However, concentrations within the groundwater plume are above both criteria and the plume must be evaluated as a whole, which requires mitigation of all structures within the groundwater plume, regardless of the type of building structure or property specific depth to groundwater. Additionally, seasonal and yearly groundwater fluctuations must be taken into account, and the shallowest level of groundwater, whether current or historical, should be used when determining groundwater depth and which criteria are applicable.

Site specific volatilization to indoor air criteria for non-residential uses also varies depending on building construction type and depth to groundwater. The extent of the groundwater plume should be determined, and non-residential building type and property use verified, and this information supplied to the MDEQ by February 8, 2019. Any non-residential buildings exceeding the applicable site-specific volatilization to indoor air criteria for groundwater will require mitigation.

Mitigation of structures should be completed and effective within 45 calendar days of this letter. For all structures where sub-slab depressurization systems will be utilized, they will be required to depressurize the entire floor area of the structures to a minimum of -0.02 inches of water column, have points to measure the pressure on a regular basis across the floor area, operate 24/7, and be effective and reliable. Mitigation systems other than sub-slab depressurization systems will need to be demonstrated to be effective, reliable, and operate 24/7. Specific details on system design, operations and maintenance, contingency actions, etc., will be required in the future submittal of the Vapor Intrusion Assessment and Mitigation Plan as required in Section 6.6, Interim Response Activities (b)(ii) of the Consent Decree.

Groundwater levels and concentrations can fluctuate based on precipitation events, seasonal fluctuations, temperature, and a variety of factors. Shallow monitor wells with a result below the TDL of 1 ppb may be above criteria in a subsequent sampling event. Therefore, it is critical that additional quarterly sampling events be conducted as planned and on schedule. Additionally, the other shallow groundwater wells that have not been installed to date because of access issues are critical to assess the volatilization to indoor air pathway for shallow groundwater. All efforts to secure access and install these wells should be taken on an expedited basis.

If you should have further questions or concerns, please contact Ms. Beth Vens, Assistant District Supervisor, at 586-753-3825, or vensb@michigan.gov; or Brandon Alger, Project Manager, Southeast Michigan District Office, MDEQ, RRD, 27700 Donald Court, Warren, Michigan 48092, 586-753-3826; algerb@michigan.gov; or you may contact me.

Sincerely,

Paul Owens, District Supervisor
Southeast Michigan District Office

Remediation and Redevelopment Division

586-235-6990

owensp@michigan.gov

cc: Mr. Kris Hinskey, Arcadis U.S., Inc.

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. Beth Vens MDEQ

Ms. Krista Reed, MDEQ

Mr. Brandon Alger, MDEQ

ATTACHMENT B SHALLOW MONITORING WELL DATA FIGURE

ATTACHMENT 10 JUNE 2019 COMMUNITY LIAISON FLYER

www.fordlivoniabostonbeaconproject.com
MEET THE FORD LIVONIA BOSTON BEACON PROJECT'S

COMMUNITY LIAISON

THERESA OLECHIW



- Over 16 years environmental engineering experience
- Comprehensive neighborhood experience serving as associate project manager since 2018
- Holds bachelor's and master's degrees in environmental engineering from Michigan Technological University and Wayne State University, respectively
- Certified project manager for Arcadis, project site evaluation and restoration experts
- Dedicated to answering your questions or concerns

Email: info@fordlivoniabostonbeaconproject.com

24 Hour Toll-Free Hotline: (844) 511-1002

Mobile: (810) 814-2235

Alternative Contact:

Kris Hinskey, Certified Project Manager, Arcadis

Mobile: (269) 579-5402



Arcadis of Michigan, LLC

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Suite 500

Novi, Michigan 48377

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www.arcadis.com