



Environmental Quality Office
Sustainability, Environment & Safety
Engineering

Ford Motor Company
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July 20, 2018

Paul Owens
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Subject: Ford's Response to MDEQ July 2, 2018 Request for Conceptual Site Model (CSM)
Update and Request for Public Outreach Plan
Ford Livonia Transmission Plant
36200 Plymouth Road; Livonia, Wayne County, Michigan
MDEQ Site ID No. 82002970

Paul:

I write in response to your letter dated July 2, 2018 (received by Ford on July 9, 2018) related to Ford Motor Company's ongoing work around its Livonia plant. Ford has operated in Livonia for over sixty years and is committed to addressing those environmental conditions associated with its operations. Since 2015, Ford has reviewed the investigation plans and results associated with our ongoing response actions with the MDEQ. During this time, we have worked together to ensure that the investigation and delineation was completed properly.

Ford agrees that the Consent Decree entered between MDEQ and Ford governs the parties' relationship and provides the foundational outline for each party's obligations. The Consent Decree requires Ford to prepare investigation and then remediation plans in successive steps, with each document approved or disapproved in full before subsequent work begins. (*See, e.g.*, Consent Decree sections 6.7, 6.8, & 13.3.). The Consent Decree also provides for public comment prior to initiation of final remedies. (*Id.* Section 6.11.)

As stated in my April 13, 2018 letter to you, your March 9 letter appears to deviate from this plan by directing Ford to "proceed to take the actions and perform the response activities not directly related to the deficient portions of the Submission" subject to stipulated penalties. I am concerned that this most recent July 2, 2018 letter from you also appears to deviate from this plan.

The action plan and schedule to address the CSM data gaps requested in your July 2, 2018 letter were all provided to the MDEQ in Ford's December 12, 2017 Response to Comments letter and the December 13, 2017 Response Activity Plan (ResAP). Per your March 9, 2018 request, we split the ResAP into two separate ResAP's and resubmitted on April 13, 2018. Upon receipt of MDEQ approval of the April 13, 2018 ResAP's, Ford is prepared to implement remedial investigation and vapor mitigation assessment actions to further characterize the site and address CSM data gaps.

Ford continues to meet the requirements and timing as outlined in the Consent Decree. Over the last several months, Ford has initiated several meetings with the MDEQ to ensure that Ford and the MDEQ are maintaining open lines of communication. In this context, your March 9 and July 2 letters seem inconsistent.

I have attached a technical memorandum prepared by Arcadis which further addresses Ford's pro-active voluntary interim actions. Note that these actions and analytical results are periodically posted on Ford's dedicated public website and submitted to Brandon Alger in your office. Ford will submit a formalized Public Outreach Plan by August 7, 2018 (within 30 days of the July 9th receipt of your letter).

We look forward to continuing our work around Livonia and our productive relationship with MDEQ.

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 of Michigan, LLC
Mr. Brian Negele, MDAG
Mr. Joshua Mosher, MDEQ-C&E
Ms. Cyndi Mollenhour, MDEQ-C&E
Mr. Mitch Adelman, MDEQ-RRD
Ms. Beth Vens MDEQ-RRD
Mr. Brandon Alger, MDEQ-RRD

To:
Todd Walton – Ford Motor Company
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From:
Kris Hinskey – Arcadis
Joe Quinnan - Arcadis

Date:
July 20, 2018

Arcadis Project No.:
MI001454.0007

Subject:
Livonia Transmission Plant
Response to Michigan Department of Environmental Quality Request for
Conceptual Site Model Update
36200 Plymouth Road, Livonia, Wayne County, Michigan
MDEQ Site ID No. 82002970

Arcadis of Michigan LLC (Arcadis) has prepared this response to the letter received from the Michigan Department of Environmental Quality (MDEQ) on July 9, 2018 regarding the Request for a Conceptual Site Model (CSM) Update and Request for a Public Outreach Plan for Ford Livonia Transmission Plant (LTP) to Ford Motor Company (Ford).

Ford has built a robust conceptual site model (CSM) for the entire area of concern (AOC) using multiple lines of evidence. The initial CSM, Quality Assurance Project Plan, and the Health and Safety Plan were submitted to the MDEQ on August 25, 2017. In section 10 of the CSM, Ford acknowledged and identified data gaps that would be addressed in the Remedial Investigation and Vapor intrusion Evaluation Response Activity Plans (RespAPs). The data gaps included the following:

- Complete onsite delineation of soil vapor below the slab at LTP;
- Complete the initial investigation at various buildings outside LTP, including the Automatic Transmission New Products Center;
- Complete a site-specific investigation and evaluation of residential and commercial properties within 100 feet of vinyl chloride concentrations that exceed 2 µg/L for groundwater, which is the current criteria for residential drinking water criteria;
- Additional delineation of the light non-aqueous phase liquid beneath LTP;

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- Delineation of groundwater impacts on-site and off-site, and
- Investigation of potential source area locations.

As stated in the CSM and in compliance with the Consent Decree, activities associated with addressing the data gaps would be (and are now) presented in the two RespAPs with the expressed intent to solicit approval with the agency prior to initiating the proposed additional remedial investigation field activities. Meanwhile, Ford has voluntarily continued ongoing operation maintenance, and monitoring actions, as well as proactively proceeded with interim response design and construction activities, as documented in the quarterly status reports. The following key activities have been performed concurrent with submittal of the two RespAPs and quarterly reports.

- On September 18, 2017, Ford commenced construction of an interim sub-slab depressurization system (SSDS) within LTP. As of July 20, 2018, the SSDS is installed and connected to the interior piping network.
- Ford has performed on-site and off-site quarterly groundwater monitoring and the hydraulic control system continues to operate as designed capturing groundwater migrating east of the plant. Ford has submitted quarterly progress reports documenting field activities and reporting deliverables.
- Ford requested and conducted three meetings with the MDEQ, to discuss the RespAP submittals to facilitate alignment and aid the agency's review and approval process.
- Ford has continued to review historical documentation including UST closure reports produced by McLaren Hart generated in the 1990s.

The review of historical reports, ongoing monitoring, and routine maintenance of the hydraulic control system have not changed our understanding of the site, as presented in the initial CSM approved by MDEQ.

As of July 20, 2018, Ford has not received an approval or conditional approval from the MDEQ concerning either of the two RespAPs. Per Section 6.6(a)(ii)(H) of the Consent Decree, the CSM should be revised as appropriate to include investigation data collected at the Property and AOC as directed by the MDEQ. Upon completion of the remedial investigations, and/or if/as remedial investigations reveal data or information that substantially changes our understanding of the CSM, Ford will update the CSM, per Section 6.7(b) of the Consent Decree. A detailed schedule was provided in each of the two RespAPs that outlined the duration of each phase of the remedial investigation and VI evaluations.