

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

August 25, 2022

Ms. Jeanne Schlaufman Environmental Quality Specialist Warren District Office Remediation and Redevelopment Division Department of Environment, Great Lakes, and Energy 27700 Donald Court Warren, Michigan 48092-2793 <u>SCHLAUFMANJ1@michigan.gov</u> <u>VIA E-MAIL</u>

Ms. Schlaufman:

Attached, please find a memo dated August 25, 2022 prepared by Arcadis as discussed during the July 21, 2022 update meeting between Ford, Arcadis, and Michigan Department of Environment, Great Lakes, and Energy (EGLE). EGLE requested information related to potential off-site sources that may be contributing to vapor impacts within the sanitary sewer downstream of the Livonia Transmission Plant along Plymouth Road. The attached memo provides additional information including proposed next steps.

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

Sincerely,

Todd M. Walton Manager, Global Site Assessment & Remediation

Attached: Arcadis Memo dated August 25, 2022 from Kris Hinskey titled *Utility Corridor* Assessment – Offsite Source, 36200 Plymouth Road, Livonia, Wayne County, Michigan

cc: Mr. Chuck Pinter, Ford Mr. Kris Hinskey, Arcadis Mr. Paul Owens, EGLE Ms. Beth Vens EGLE Mr. Matthew Williams, EGLE Ms. Krista Reed, EGLE Ms. Cyndi Mollenhour, EGLE

Memo

ARCADIS

SUBJECT

Utility Corridor Assessment – Offsite Source 36200 Plymouth Road, Livonia, Wayne County, Michigan Consent Decree No. 2:1712372-GAD-RSW (CD) Site ID No.: 82002970

DATE August 25, 2022 **TO** Todd Walton, Ford Chuck Pinter, Ford

PROJECT NUMBER 30080642

NAME Kris Hinskey 269-579-5402 Kristoffer.hinskey@arcadis.com

On behalf of Ford Motor Company (Ford), Arcadis of Michigan, LLC (Arcadis) has prepared this memorandum (memo) for the Livonia Transmission Plant (LTP) site (the site). This memo was prepared based on comments and guidance from Michigan Department of Environment, Great Lakes, and Energy (EGLE) during the July 21, 2022 meeting with Ford, Arcadis, and EGLE. EGLE requested any information related to a potential off-site vapor source that is contributing to vapor impacts within the sanitary sewer. Based on the data collected recently, elevated vapor concentrations of site-specific constituents of concern (COCs) have been identified in sanitary sewer sample location (SL) SL-4 which is located adjacent to 34500 Plymouth Road, Livonia, Michigan (the Property) (**Figure 1**). SL-4 is currently part of the utility corridor assessment and is sampled on a weekly basis voluntarily by Ford. The property is currently occupied by a vehicle rental business and has a Facility ID: 00033019, which was provided by the Licensing and Regulatory Affairs of the State of Michigan. The Facility ID was provided to the Property. The sections detailed below document the request from EGLE.

Background

Between September 14, 2020, and August 2, 2022, Arcadis collected approximately 211 vapor samples and 202 liquid samples from six off-site sanitary sewer manholes located on Plymouth Road immediately upgradient, downgradient, and in front of the Property (manholes SL-3, SL-4, SL-5, SL-16, SL-17, and SL-18; **Figure 1**). The liquid and vapor samples are used to evaluate the presence of site-specific COCs within the sanitary sewer immediately upgradient, downgradient, and in front of the Property. The site specific COCs for the site, as defined by the Consent Decree, include trichloroethene (TCE), tetrachloroethene (PCE), 1,1-dichloroethene (DCE), cis-1,2-dichloroethene (cDCE), trans-1,2-dichoroethene (tDCE), vinyl chloride (VC), and 1,4-dioxane. Vapor samples were analyzed for site-specific COCs via United States Environmental Protection Agency (USEPA) Method TO-15 and liquid samples were analyzed for site-related COCs via method 8260D, 8260D SIM, and 5030C. Analytical results of select liquid and vapor samples collected indicated the presence of site-specific COCs within the sanitary sewer manholes listed above located along Plymouth Road.

In response to the presence of site-specific COCs in the sanitary sewer along Plymouth Road, from June 16 through July 1, 2021, Arcadis oversaw Michels Corporation clean and closed-circuit televise (CCTV) the sanitary sewer system along Plymouth Road up to Stark Road. The CCTV inspection assisted in locating lateral pipes entering the Plymouth Road sanitary sewer system. Approximately 2,226 linear feet was CCTV'ed and cleaned. Overall 44 laterals were identified between SL-2 and SL-5. A section of this sanitary sewer along Plymouth Road close to the Property is shown on **Figure 2**. A total of 3 laterals were identified in front of the Property during cleaning and CCTV of this section.

In response to the letter from EGLE dated February 11, 2022, Ford pursued and gained access to off-site commercial properties along Plymouth Road. This was done in order to complete plumbing inspections and dye testing, as necessary, at these properties in accordance with the Plumbing Inspection Scope of Work presented in the April 1, 2022 memo. Dye testing was completed where necessary in order to identify active and non-active sanitary sewer laterals connected from the commercial buildings to the Plymouth Road sanitary sewer. Out of the commercial properties identified on **Figure 2** along Plymouth Road, Arcadis has completed the following at each property:

- 34850 Plymouth Road completed dye testing where one active lateral was identified;
- 34800 Plymouth Road access has been pursued but not granted;
- 34706 34730 Plymouth Road access has been granted to portions of this building. Dye testing will be scheduled once access is granted to the remaining commercial properties along Plymouth Road;
- 34500 Plymouth Road (the Property) access has been pursued but not granted;
- 34450 Plymouth Road Access has been granted. Dye testing will be scheduled once access is granted to the remaining commercial properties along Plymouth Road.

As proposed in the Response Activity Plan for Interim Response Activities (ResAP IRA) submitted to EGLE on May 31, 2022 (approved by EGLE June 23, 2022), Ford installed a sanitary sewer vapor extraction (SSVE) system on the site on May 25, 2022. The purpose of the SSVE system is to capture and treat vapors within one of the primary sanitary sewer main lines and to minimize the potential for COC vapors to migrate off site along Plymouth Road. The SSVE system was installed on May 25, 2022 to temporarily extract vapor from an on-site manhole located at SAMH-1244 and was moved in early July 2022 to the primary extraction location approximately 37 feet north of SAMH-1231. See **Figure 1** for the location of SAMH-1244 and SAMH-1231.

Post-SSVE installation liquid and vapor sample results for manholes SL-3, SL-4, SL-5, SL-16, SL-17, and SL-18 are shown on **Table 1** and **Figure 3** (**Figure 3** shows TCE and VC results only) and **Table 2** and **Figure 4** (**Figure 4** shows TCE and VC results only), respectively.

34500 Plymouth Access and Communications

Based on the analytical results from vapor samples collected at SL-4 located in front of the Property as shown on **Figure 4** and in response to the letter from EGLE dated February 11, 2022, Ford has attempted to gain access to the Property to conduct a plumbing inspection and identify potential impacts to the sanitary sewer system at the Property.

An access agreement was sent to the Property on June 29, 2021, September 15, 2021, and March 3, 2022, as specified in the memo provided to EGLE dated March 4, 2022. In accordance with the March 4, 2022 memo, Arcadis implemented phone call and/or door-to-door follow-up at the Property on March 24, 2022. On March 28, 2022, Arcadis spoke with the Property owner and confirmed their ownership of the Property. The Property owner requested an access agreement be sent out to them. On March 25, 2022 and April 19, 2022, an access agreement was sent to the property owner. On April 20, 2022, Arcadis contacted the Property owner on behalf of Ford, and the phone call was terminated by the recipient once the Arcadis project manager introduced themself. On May 13, 2022, the Property owner contacted Arcadis and informed Arcadis that they own the Property but not the building on the Property. The Property owner and left a message regarding gaining access to the Property.

The last correspondence with the tenant and the Property owner was conducted via email on July 21, 2022, when Arcadis on behalf of Ford requested for the Property owner to sign the access agreement that was provided.

34500 Plymouth Facility Information

According to an Environmental Database Report (EDR) aerial photo decade package received by Arcadis on February 22, 2016 (**Attachment 1**), the Property was an open field with no active use until approximately 1987. Although the exact year has not been confirmed, between 1987 and 1997, the Property began being used for a car rental business and is still being used for this purpose today.

According to information provided on the online EGLE Michigan Environmental Mapper (the Environmental Mapper), the Property is listed as a Facility (Facility identification [ID]: 00033019) with an open release status that is being classified under Part 211 of the Natural Resources and Environmental Protection Act (NREPA). PA 451 of 1994, as amended, for Underground Storage Tank (UST) Facilities.

The Environmental Mapper currently lists four USTs associated with the Property. Pertinent information from the Environmental Mapper regarding these USTs is shown below in **Exhibit 1.**

							Estimated	
						Estimated	Date Tank	
	Tank	Substance	Date of	Capacity	Date of	Date Last	Was	Tank Was
Tank ID	Status	Stored	Installation	(gallons)	Registration	Used	Removed	Removed?
	Removed							
UTK-060314-15	from	Used Oil	08/01/1992	560	01/01/1900	03/01/1997	09/03/1997	Yes
	Ground							
	Non-							
UTK-116088-15	Registered							No
	Tank							
LITK-060309-15	Temporarily	Gasoline	08/01/1989	10.000	08/28/1989	09/30/2010		No
0111-000303-13	Out of Use	Casoline	00/01/1909	10,000	00/20/1909	03/30/2010		NO
LITK 060212 15	Temporarily	Diocol	09/01/1090	10.000	09/29/1090	00/20/2010		No
011-000312-15	Out of Use	Diesel	00/01/1909	10,000	00/20/1909	09/30/2010		INU

Exhibit 1. Facility ID 00033019 Underground Storage Tank Information

Notes:

-- = Information not provided

No information is available on the size, depth, construction, use, or location of the "non-registered" UST, and no current information is available on the use or location of the registered "temporarily out of use" 10,000-gallon USTs. Any potential soil or groundwater impacts to the Property are also currently unknown.

There has been no other submittals associated with the Property (Baseline Environmental Assessments, Notices of Migration, Notices of On-Site Work Activity, Closure Reports, Initial or Final Assessment Reports, etc.) are listed on the Environmental Mapper.

In addition to reviewing information from the Environmental Mapper, Arcadis also submitted a Freedom of Information Act (FOIA) request to EGLE for the Property on October 27, 2021 in order to review any regulatory documents that may have been submitted to EGLE related to open or closed sites regulated under Part 201 or Part 213 of the NREPA. EGLE denied the request on November 1, 2021 stating that "After a search, to the best of this public body's knowledge, information, and belief, the public record(s) do not exist as described by you, or by another name or description reasonably known to the public body; therefore, your request to examine or receive a

copy of the documents described above is denied." A copy of the denial correspondence is included in **Attachment 2**. Arcadis submitted another FOIA request for the Property on August 17, 2022 and requested any regulatory documents submitted to EGLE pertaining to open or closed sites regulated not only under Part 201 and Part 213, but also under Part 211 of the NREPA. Regulatory documents submitted to EGLE under Part 211 of the NREPA was additionally requested because the Environmental Mapper classifies the Facility ID 00033019 for the Property as being in the Part 211 regulatory program.

Next Steps

Arcadis plans to complete the following next steps to determine if there is a potential offsite source:

- Additional data evaluation, including a review of all available data (analytical sample results, groundwater elevations, etc.) collected in the vicinity of the Property to date;
- Soil, groundwater, and soil vapor investigation within the Plymouth Road right-of-way (ROW) (including an
 evaluation of utilities in the ROW (i.e., requesting MISS DIG ticket(s) to determine the viability of this work)) to
 evaluate current conditions near the Property; and
- Pursue access to the Property in order to complete a plumbing inspection and dye testing (as necessary) in response to the letter from EGLE dated February 11, 2022 and in accordance with the Plumbing Inspection Scope of Work presented in the April 1, 2022 memo.

In closing, the goal of this memo is to continue the investigation of the vapor impacts within the sanitary sewer in Plymouth Road and to determine potential sources both onsite and offsite Progress updates on next steps will be communicated during the triweekly meetings scheduled by EGLE (next meeting scheduled for September 1, 2022).

Enc.

 Table 1. Post SSVE Installation Utility Corridor Off-Site Non-Residential Vapor Results

Table 2. Post SSVE Installation Utility Corridor Off-Site Liquid Results

Figure 1. On-Site and Off-Site Sanitary Sewer Layout

Figure 2. Off-Site Sanitary Sewer Structures and Rehabilitation

Figure 3. Off-Site Liquid Results Trichloroethene and Vinyl Chloride

Figure 4. Off-Site Vapor Results Trichloroethene and Vinyl Chloride

Attachment 1. EDR Aerial Photo Decade Package

Attachment 2. FOIA Denial Correspondence

Tables

Location:	EGLE	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-4	SL-4
Survey ID:	Nonresidential	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	12 hour exposure	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022	6/27/2022	7/5/2022	7/11/2022	7/18/2022	7/25/2022	8/1/2022	5/25/2022	5/31/2022
Volatile Organic Compo	ounds (VOCs)													
1,1-Dichloroethene	610	6.5	< 0.60	3.6	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60 [< 0.60]	1.8 [1.7]
1,4-Dioxane	24	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60 [< 0.60]	< 0.60 [< 0.60]
cis-1,2-Dichloroethene	25	520	< 0.58	420	< 0.58	< 0.58	< 0.58	< 0.58	< 0.58	< 0.58	3.8	< 0.58	1.7 [2.9]	88 [91]
Tetrachloroethene	82	19	< 1.0	3.5	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0 [< 1.0]	3.9 [4.3]
trans-1,2-Dichloroethene	250	8.4	< 0.62	6.9	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62 [< 0.62]	2.5 [2.6]
Trichloroethene	4.0	25	< 0.72	21	< 0.72	0.82 J	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72 [< 0.72]	9.2 [9.7]
Vinyl chloride	27	960	< 0.46	440	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	< 0.46	3.3 [5.9]	200 [220]



Location:	EGLE	SL-4	SL-5	SL-5	SL-5	SL-5								
Survey ID:	Nonresidential	NA	NA	NA	NA	NA								
Sample Date:	12 hour exposure	6/6/2022	6/14/2022	6/20/2022	6/27/2022	7/5/2022	7/11/2022	7/18/2022	7/25/2022	8/1/2022	5/24/2022	6/2/2022	6/7/2022	6/14/2022
Volatile Organic Compo	ounds (VOCs)		-		-			-	_			-	-	-
1,1-Dichloroethene	610	1.7 [4.1]	1.9 [5.3]	< 0.60 [< 0.60]	6.5 [1.0]	1.3 [1.3]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60	< 0.60	< 0.60	2.5
1,4-Dioxane	24	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60 [< 0.60]	< 0.60	< 0.60	< 0.60	< 0.60
cis-1,2-Dichloroethene	25	28 [500]	44 [120]	14 [14]	320 [49]	140 [180]	15 [44]	380 [420]	< 0.58 [< 0.58]	3.1 [3.7]	2.1	65	36	200
Tetrachloroethene	82	< 1.0 [4.2]	1.1 J [3.0]	1.9 [1.5]	3.6 [< 1.0]	1.5 [2.1]	< 1.0 [< 1.0]	8.3 [6.3]	< 1.0 [< 1.0]	< 1.0 [1.4]	< 1.0	1.8	< 1.0	75
trans-1,2-Dichloroethene	250	0.65 J [6.9]	1.7 [4.3]	< 0.62 [< 0.62]	8.2 [1.3]	5.4 [7.0]	< 0.62 [0.68 J]	7.2 [7.8]	< 0.62 [< 0.62]	< 0.62 [< 0.62]	< 0.62	0.79	1.2	2.9
Trichloroethene	4.0	2.5 [25]	7.2 [17]	2.0 [2.2]	24 [4.0]	39 [48]	1.4 [2.8]	23 [27]	< 0.72 [< 0.72]	< 0.72 [< 0.72]	< 0.72	3.7	7.7	13
Vinyl chloride	27	77 [550]	100 [280]	17 [23]	750 [110]	230 [290]	7.6 [30]	380 [410]	< 0.46 [< 0.46]	1.7 [< 0.46]	4.0	56	53	190



Location:	EGLE	SL-5	SL-5	SL-5	SL-5	SL-5	SL-5	SL-5	SL-16	SL-16	SL-16	SL-16	SL-16
Survey ID:	Nonresidential	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	12 hour exposure	6/21/2022	6/28/2022	7/6/2022	7/12/2022	7/19/2022	7/26/2022	8/2/2022	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022
Volatile Organic Compo	punds (VOCs)									-			-
1,1-Dichloroethene	610	2.6	< 0.60	< 0.60	< 0.60	< 0.60	1.6	< 0.60	< 0.60	< 0.60	1.3	< 0.60	< 0.60
1,4-Dioxane	24	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60
cis-1,2-Dichloroethene	25	320	14	14	5.8	240	6.9	5.2	< 0.58	< 0.58	94	< 0.58	< 0.58
Tetrachloroethene	82	60	< 1.0	1.1 J	< 1.0	24	9.1	4.2	< 1.0	< 1.0	1.1 J	< 1.0	< 1.0
trans-1,2-Dichloroethene	250	4.8	< 0.62	< 0.62	< 0.62	7.2	< 0.62	< 0.62	< 0.62	< 0.62	1.5	< 0.62	< 0.62
Trichloroethene	4.0	24	1.9	2.8	< 0.72	19	2.6	< 0.72	< 0.72	0.88 J	4.7	< 0.72	< 0.72
Vinyl chloride	27	320	12	16	4.7	380	2.9	4.0	< 0.46	< 0.46	140	< 0.46	< 0.46



Location:	EGLE	SL-16	SL-16	SL-16	SL-16	SL-16	SL-16	SL-17	SL-17	SL-17	SL-17	SL-17	SL-17
Survey ID:	Nonresidential	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	12 hour exposure	6/27/2022	7/5/2022	7/11/2022	7/18/2022	7/25/2022	8/1/2022	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022	6/27/2022
Volatile Organic Compo	ounds (VOCs)		-	-				-	-		-		-
1,1-Dichloroethene	610	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	1.5	< 0.60	< 0.60	< 0.60
1,4-Dioxane	24	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60
cis-1,2-Dichloroethene	25	< 0.58	< 0.58	1.0	2.8	< 0.58	< 0.58	21	1.2	110	< 0.58	< 0.58	< 0.58
Tetrachloroethene	82	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	1.4	< 1.0	< 1.0	< 1.0
trans-1,2-Dichloroethene	250	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	1.6	< 0.62	< 0.62	< 0.62
Trichloroethene	4.0	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	1.2	< 0.72	5.4	< 0.72	< 0.72	< 0.72
Vinyl chloride	27	< 0.46	< 0.46	< 0.46	1.9	< 0.46	< 0.46	25	0.52	140	< 0.46	< 0.46	< 0.46



Location:	EGLE	SL-17	SL-17	SL-17	SL-17	SL-17	SL-18	SL-18	SL-18	SL-18	SL-18	SL-18	SL-18
Survey ID:	Nonresidential	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	12 hour exposure	7/5/2022	7/11/2022	7/18/2022	7/25/2022	8/1/2022	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022	6/27/2022	7/5/2022
Volatile Organic Compo	punds (VOCs)		-	-				-					
1,1-Dichloroethene	610	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60
1,4-Dioxane	24	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60	< 0.60
cis-1,2-Dichloroethene	25	1.6	140	450	2.3	< 0.58	0.95	< 0.58	1.3	< 0.58	< 0.58	< 0.58	< 0.58
Tetrachloroethene	82	< 1.0	< 1.0	3.8	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
trans-1,2-Dichloroethene	250	< 0.62	1.6	7.0	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62	< 0.62
Trichloroethene	4.0	0.99 J	3.0	22	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72	< 0.72
Vinyl chloride	27	0.46 J	85	370	2.2	< 0.46	< 0.46	< 0.46	1.7	< 0.46	< 0.46	< 0.46	< 0.46



Table 1

Post SSVE Installation Utility Corridor Off-Site Non-Residential Vapor Results Ford Livonia Transmission Plant 36200 Plymouth Road Livonia, Michigan

Location:	EGLE	SL-18	SL-18	SL-18	SL-18
Survey ID:	Nonresidential	NA	NA	NA	NA
Sample Date:	12 hour exposure	7/11/2022	7/18/2022	7/25/2022	8/1/2022
Volatile Organic Compo	ounds (VOCs)			-	_
1,1-Dichloroethene	610	< 0.60	< 0.60	< 0.60	< 0.60
1,4-Dioxane	24	< 0.60	< 0.60	< 0.60	< 0.60
cis-1,2-Dichloroethene	25	10	< 0.58	< 0.58	< 0.58
Tetrachloroethene	82	< 1.0	< 1.0	< 1.0	1.7
trans-1,2-Dichloroethene	250	< 0.62	< 0.62	< 0.62	< 0.62
Trichloroethene	4.0	< 0.72	< 0.72	< 0.72	< 0.72
Vinyl chloride	27	6.7	< 0.46	< 0.46	< 0.46



Table 1

Post SSVE Installation Utility Corridor Off-Site Non-Residential Vapor Results Ford Livonia Transmission Plant 36200 Plymouth Road Livonia, Michigan

Notes:

All results reported in μ g/m³.

Dold	Result exceeds the EGLE site-specific volatilization to indoor air criteria (SSVIAC) to evaluate vapor migration in preferential
Боій	pathways developed for restricted nonresidential 12-hour workday exposure

Bold Result exceeds the EGLE unrestricted residential exposure and the EGLE site-specific volatilization to indoor air criteria and (SSVIAC) to evaluate vapor migration in preferential pathways developed for restricted nonresidential 12-hour workday

shaded exposure

< Denotes not detected above reporting limit or method detection limit.

Abbreviations:

[] duplicate sample result

µg/m³ micrograms per cubic meter

EGLE Michigan Department of Environment, Great Lakes, and Energy

ID identification

J estimated result

MH manhole

SAMH sanitary manhole

STMH storm manhole

United States Environmental Protection Agency (USEPA) Method TO-15

This document is a DRAFT document that has not received approval from 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 EGLE.



Location:	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-3	SL-4	SL-4
Survey ID:	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022	6/27/2022	7/5/2022	7/11/2022	7/18/2022	7/25/2022	8/1/2022	5/25/2022	5/31/2022
Semi-Volatile Organic Compound	is (SVOCs)											•	
1,4-Dioxane	5.3	5.1	2.3	< 0.86	5.5	1.5 J	< 0.86	8.2	5.6	7.9	8.1	3.7 [3.8]	1.5 J [< 0.86]
Volatile Organic Compounds (VOCs)													
1,1-Dichloroethene	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49 [< 0.49]	< 0.49 [< 0.49]
cis-1,2-Dichloroethene	10	6.3	2.2	2.6	4.6	2.9	3.5	5.1	3.6	6.7	7.5	9.3 [9.2]	1.4 [2.4]
Tetrachloroethene	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44 [< 0.44]	< 0.44 [< 0.44]
trans-1,2-Dichloroethene	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51 [< 0.51]	< 0.51 [< 0.51]
Trichloroethene	< 0.44	< 0.44	< 0.44	0.59 J	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44 [< 0.44]	< 0.44 [< 0.44]
Vinyl chloride	5.9	3.8	1.4	1.5	2.8	1.7	2.0	3.0	2.1	3.6	4.7	3.9 [4.2]	0.80 J [1.6]



Location:	SL-4	SL-5	SL-5	SL-5	SL-5								
Survey ID:	NA	NA	NA	NA	NA								
Sample Date:	6/6/2022	6/14/2022	6/20/2022	6/27/2022	7/5/2022	7/11/2022	7/18/2022	7/25/2022	8/1/2022	5/24/2022	6/2/2022	6/7/2022	6/14/2022
Semi-Volatile Organic Compound													
1,4-Dioxane	4.1 [2.2]	0.97 J [1.2 J]	2.5 [1.0 J]	1.1 J [1.4 J]	< 0.86 [3.2]	1.9 J [2.8]	4.0 [3.5]	4.0 [4.4]	2.4 [3.2]	2.9	2.6	2.0	2.0
Volatile Organic Compounds (VO								•			·	·	
1,1-Dichloroethene	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49 [< 0.49]	< 0.49	< 0.49	< 0.49	< 0.49
cis-1,2-Dichloroethene	6.8 [6.7]	1.8 [1.7]	2.5 [0.74 J]	1.6 [1.6]	1.7 [2.4]	1.6 [3.1]	5.0 [5.4]	4.1 [4.4]	2.1 [2.6]	4.3	4.4	2.2	3.8
Tetrachloroethene	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44	< 0.44	< 0.44	< 0.44
trans-1,2-Dichloroethene	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51 [< 0.51]	< 0.51	< 0.51	< 0.51	< 0.51
Trichloroethene	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [0.78 J]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44 [< 0.44]	< 0.44	< 0.44	0.46 J	< 0.44
Vinyl chloride	3.4 [3.3]	0.98 J [0.95 J]	1.7 [< 0.45]	0.80 J [0.85 J]	0.73 J [1.7]	0.67 J [1.4]	2.4 [2.6]	2.1 [2.2]	1.3 [1.6]	1.9	2.3	0.97 J	1.8



Location:	SL-5	SL-5	SL-5	SL-5	SL-5	SL-5	SL-5	SL-16	SL-16	SL-16	SL-16	SL-16	SL-16
Survey ID:	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	6/21/2022	6/28/2022	7/6/2022	7/12/2022	7/19/2022	7/26/2022	8/2/2022	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022	6/27/2022
Semi-Volatile Organic Compound													
1,4-Dioxane	3.7	1.6 J	4.2	3.5	2.2	1.4 J	2.1	3.5	< 0.86	1.9 J	6.1	< 0.86	1.5 J
Volatile Organic Compounds (VO													
1,1-Dichloroethene	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49
cis-1,2-Dichloroethene	3.4	2.5	1.8	4.7	1.7	1.3	1.6	3.0	0.79 J	1.8	9.8	0.66 J	2.6
Tetrachloroethene	< 0.44	< 0.44	< 0.44	< 0.44	1.0	< 0.44	1.2	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44
trans-1,2-Dichloroethene	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51
Trichloroethene	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	0.81 J	< 0.44	< 0.44	< 0.44	0.98 J	< 0.44
Vinyl chloride	1.9	0.88 J	0.70 J	2.0	0.83 J	< 0.45	0.81 J	0.74 J	< 0.45	0.98 J	4.6	< 0.45	1.6



Location:	SL-16	SL-16	SL-16	SL-16	SL-16	SL-17	SL-17	SL-17	SL-17	SL-17	SL-17	SL-17	SL-17
Survey ID:	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	7/5/2022	7/11/2022	7/18/2022	7/25/2022	8/1/2022	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022	6/27/2022	7/5/2022	7/11/2022
Semi-Volatile Organic Compound													
1,4-Dioxane	4.2	10	5.5	< 0.86	5.7	3.0	3.0	5.2	7.4	1.8 J	1.5 J	4.6	13
Volatile Organic Compounds (VO													
1,1-Dichloroethene	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49
cis-1,2-Dichloroethene	3.3	7.7	4.6	1.3	3.9	8.3	0.70 J	9.0	13	1.5	2.4	6.2	7.6
Tetrachloroethene	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44
trans-1,2-Dichloroethene	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51
Trichloroethene	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44
Vinyl chloride	1.9	4.7	3.2	0.66 J	1.9	4.5	< 0.45	5.1	5.8	0.95 J	1.4	4.2	4.2



Location:	SL-17	SL-17	SL-17	SL-18	SL-18	SL-18	SL-18	SL-18	SL-18	SL-18	SL-18	SL-18	SL-18
Survey ID:	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sample Date:	7/18/2022	7/25/2022	8/1/2022	5/25/2022	5/31/2022	6/6/2022	6/13/2022	6/20/2022	6/27/2022	7/5/2022	7/11/2022	7/18/2022	7/25/2022
Semi-Volatile Organic Compound													
1,4-Dioxane	3.4	5.5	6.1	1.6 J	2.1	4.8	4.4	2.3	1.3 J	1.5 J	8.4	3.2	2.8
Volatile Organic Compounds (VO													
1,1-Dichloroethene	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49	< 0.49
cis-1,2-Dichloroethene	4.3	5.9	2.8	4.9	1.8	7.1	7.2	2.5	1.8	3.7	6.2	2.9	3.9
Tetrachloroethene	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44
trans-1,2-Dichloroethene	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51	< 0.51
Trichloroethene	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44	< 0.44
Vinyl chloride	3.1	2.8	1.6	2.5	1.2	3.7	3.9	1.6	0.98 J	1.7	3.0	1.4	1.2



Location:	SL-18
Survey ID:	NA
Sample Date:	8/1/2022
Semi-Volatile Organic Compound	
1,4-Dioxane	2.1
Volatile Organic Compounds (VO	
1,1-Dichloroethene	< 0.49
cis-1,2-Dichloroethene	1.6
Tetrachloroethene	< 0.44
trans-1,2-Dichloroethene	< 0.51
Trichloroethene	< 0.44
Vinyl chloride	0.84 J



Notes:

- Bold Result exceeds the EGLE Groundwater Surface Water Interface (GSI) Protection Criteria updated June 25, 2018.
- < Denotes not detected above reporting limit.

Abbreviations:

EGLE Michigan Department of Environment, Great Lakes, and Energy

- J estimated result
- R Sample results rejected due to analysis conducted outside of hold time
- µg/l micrograms per liter
- NA not available
- [] duplicate sample results
- SL Sampling Location
- NA not available/not applicable

Analytical Method

8260B SIM for Semi-volatile Organic Compounds (SVOCs) 8260B for Volatile Organic Compounds (VOCs)

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(SANITARY MANHOLE FLOW DIRECTION

SANITARY SEWER LINE

FIGURE SHOWS DATA FOR TRICHLOROETHENE AND VINYL CHLORIDE ONLY. FULL SET OF DATA CAN BE FOUND IN THE CORRESPONDING TABLES.

"ND (<0.4)", "<" - INDICATES THE VALUE IS BELOW THE LABORATORY METHOD DETECTION LIMIT FOR THE ASSOCIATED SAMPLING EVENT

EGLE = DEPARTMENT OF ENVIRONMENT, GREAT LAKES & ENERGY

SL = SAMPLING LOCATION

J = ESTIMATED RESULT

µg/L = MICROGRAMS PER LITER

[] = DUPLICATE SAMPLE RESULTS

LIQUID RESULTS REPORTED IN µg/L. ANALYTICAL METHOD: UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 8260B FOR VOLATILE ORGANIC COMPOUNDS.

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FORD MOTOR COMPANY LIVONIA TRANSMISSION PLANT LIVONIA, MICHIGAN

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SCALE IN FEET

OFFSITE LIQUID RESULTS TRICHLOROETHENE AND VINYL CHLORIDE



FIGURE 3

200

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34800 Plymouth Road		Saroe - 34730 Plymouth Road	FRISCILLA LAVE	34500 Plymouth Road	34450 Plymouth Road
Tr 5/31/202 6/6/2022 6/2022 6/20/202 6/27/202 7/5/2022 7/5/2022 7/11/202	SL-18 richloroethene (µg/m³) 12 ND (< 0.72) 2 ND (< 0.72) 12 ND (< 0.72)		UTH ROAD	SL-4 Trichloroethene (µg/m³) 5/31/2022 9.2 [9.7] 6/6/2022 2.5 [25] 6/14/2022 7.2 [17] 6/20/2022 2.0 [2.2] 6/27/2022 24 [4.0] 7/5/2022 39 [48] 7/11/2022 1.4 [2.8] 7/18/2022 23 [27]	Jers and an internet
7/18/202 7/25/202 8/1/202 5/31/202 6/6/2022 6/13/202 6/20/202 6/27/202 7/5/2022 7/5/2022 7/5/2022	12 ND (< 0.72)			7/16/2022 25 [27] 7/25/2022 ND (< 0.72) [ND (< 0.72)] 8/1/2022 ND (< 0.72) [ND (< 0.72)] Vinyl Chloride (µg/m³) 5/31/2022 200 [220] 6/6/2022 77 [550] 6/14/2022 100 [280] 6/20/2022 17 [23] 6/27/2022 750 [110] 7/5/2022 230 [290] 7/11/2022 380 [410]	
7/18/202 7/25/202 8/1/2027	22 ND (< 0.46) 22 ND (< 0.46) 2 ND (< 0.46)			7/25/2022 ND (< 0.46) [ND (< 0.46)] 8/1/2022 1.7 [ND (< 0.46)]	

LEGEND

- SANITARY MANHOLE
- FLOW DIRECTION
- SANITARY SEWER LINE

BLUE/BOLD TEXT RESULT (OR DUPLICATE)

EXCEEDS THE EGLE SSVIAC

NOTES:

FIGURE SHOWS DATA FOR TRICHLOROETHENE AND VINYL CHLORIDE ONLY. FULL SET OF DATA CAN BE FOUND IN THE CORRESPONDING TABLES.

"ND (<0.4)", "<" - INDICATES THE VALUE IS BELOW THE LABORATORY METHOD DETECTION LIMIT FOR THE ASSOCIATED SAMPLING EVENT

EGLE = DEPARTMENT OF ENVIRONMENT, GREAT LAKES & ENERGY

SSVIAC = SITE-SPECIFIC VOLATILIZATION TO INDOOR AIR CRITERIA

- SL = SAMPLING LOCATION
- µg/m³ = MICROGRAMS PER CUBIC METER
- [] = DUPLICATE SAMPLE RESULTS

VAPOR RESULTS REPORTED IN µg/m³. ANALYTICAL METHOD: UNITED STATES ENVIRONMENTAL PROTECTION AGENCY TO-15.

RESULTS FROM LOCATIONS ONSITE AND ALONG PLYMOUTH ROAD ARE COMPARED TO THE EGLE RESTRICTED NONRESIDENTIAL SSVIAC 12-HOUR WORKDAY EXPOSURE FOR TRICHLOROETHENE OF 4.0 µg/m³ AND FOR VINYL CHLORIDE OF 27 µg/m³. RESULTS FROM LOCATIONS ALONG STARK ROAD (INCLUDING SL-5) ARE COMPARED TO BOTH EGLE RESTRICTED NONRESIDENTIAL SSVIAC AND THE EGLE UNRESTRICTED RESIDENTIAL SSVIAC FOR TRICHLOROETHENE OF 2.0 µg/m³ AND VINYL CHLORIDE OF 1.6 µg/m³.

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1. 1. 11

SL-5						
Trichloroethene (μg/m³)						
6/2/2022	3.7					
6/7/2022	7.7					
6/14/2022	13					
6/21/2022	24					
6/28/2022	1.9					
7/6/2022	2.8					
7/12/2022	ND (< 0.72)					
7/19/2022	19					
7/26/2022	2.6					
8/2/2022	ND (< 0.72)					
Vinyl Chloride (µg/m ³)						
6/2/2022	56					
6/7/2022	53					
6/14/2022	190					
6/21/2022	320					
6/28/2022	12					
7/6/2022	16					
7/12/2022	4.7					
7/19/2022	380					
7/26/2022	2.9					
8/2/2022	4.0					

INTERESIONE

SCALE IN FEET

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FORD MOTOR COMPANY LIVONIA TRANSMISSION PLANT LIVONIA, MICHIGAN

OFFSITE VAPOR RESULTS TRICHLOROETHENE AND VINYL CHLORIDE



FIGURE

Attachment 1

Ford LTP 34851 Beacon St Livonia, MI 48150

Inquiry Number: 4543305.5 February 22, 2016

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th Floor Shelton, Connecticut 06484 Toll Free: 800.352.0050 www.edrnet.com

EDR Aerial Photo Decade Package

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Date EDR Searched Historical Sources:

Aerial Photography February 22, 2016

Target Property:

34851 Beacon St Livonia, MI 48150

<u>Year</u>	Scale	<u>Details</u>	<u>Source</u>
1937	Aerial Photograph. Scale: 1"=500'	Flight Year: 1937	USGS
1940	Aerial Photograph. Scale: 1"=500'	Flight Year: 1940	USGS
1949	Aerial Photograph. Scale: 1"=500'	Flight Year: 1949	USGS
1952	Aerial Photograph. Scale: 1"=500'	Flight Year: 1952	USGS
1957	Aerial Photograph. Scale: 1"=500'	Flight Year: 1957	USGS
1960	Aerial Photograph. Scale: 1"=500'	Flight Year: 1960	USGS
1967	Aerial Photograph. Scale: 1"=500'	Flight Year: 1967	USGS
1972	Aerial Photograph. Scale: 1"=500'	Flight Year: 1972	USGS
1983	Aerial Photograph. Scale: 1"=500'	Flight Year: 1983	USGS
1987	Aerial Photograph. Scale: 1"=500'	Flight Year: 1987	USGS
1997	Aerial Photograph. Scale: 1"=500'	Flight Year: 1997	USGS
1999	Aerial Photograph. Scale: 1"=500'	/DOQQ - acquisition dates: 1999	USGS/DOQQ
2005	Aerial Photograph. Scale: 1"=500'	Flight Year: 2005	USDA/NAIP
2009	Aerial Photograph. Scale: 1"=500'	Flight Year: 2009	USDA/NAIP
2010	Aerial Photograph. Scale: 1"=500'	Flight Year: 2010	USDA/NAIP
2012	Aerial Photograph. Scale: 1"=500'	Flight Year: 2012	USDA/NAIP













Attachment 2

Meckley, Megan

From: Sent: To: Subject: EGLE FOIA Request Center <michiganegle@govqa.us> Monday, November 1, 2021 4:27 PM Meckley, Megan FOIA Request :: E201599-102621

--- Please respond above this line ---

November 01, 2021

Reference Number: E201599-102621

Mrs. Megan Meckley Arcadis 28550 Cabot Drive, Suite 500 Novi, MI 48377

Dear Mrs. Meckley:

This notice is issued in response to your request for information under the Freedom of Information Act (FOIA), MCL 15.231 et seq.

You requested the following:

Seeking Environmental regulatory reports submitted to EGLE related to the Site located at 34500 Plymouth Road including Site Status Reports, Closure Reports, NFAs, Free Product Reports, monitoring reports, IAR, BEA, FAR, Due Care Plans, Phase I, Phase II or any report pertaining to open or closed Part 201 or Part 213.

The purpose of the FOIA is to provide the public with access to existing, nonexempt public records of public bodies. After a search, to the best of this public body's knowledge, information, and belief, the public record(s) do not exist as described by you, or by another name or description reasonably known to the public body; therefore, your request to examine or receive a copy of the documents described above is denied.

Under section 10 of the FOIA, the Department of Environment, Great Lakes, and Energy (EGLE) is obligated to inform you of the following:

1) You may appeal this decision in writing to the Senior Deputy Director, Department of Environment, Great Lakes, and Energy, P.O. Box 30473, Lansing, Michigan 48909-7973. The writing must specifically state the word "appeal" and identify the basis for which the disclosure determination should be reversed. The Senior Deputy Director, or her delegated designee, must respond to the appeal within 10 business days of its receipt. Under unusual circumstances, the time for response to the appeal may be extended by 10 business days.

2) You may commence a civil action in the Court of Claims within 180 days after the date of the final determination to deny the request. If you prevail in such an action, the court is to award reasonable attorney fees, costs, and disbursements, and possible damages.

If you have questions concerning this matter, please access your online account and reply to this message there. To

review a copy of EGLE's FOIA policy and procedure, public written summary, and several online databases, go to <u>www.michigan.gov/eglefoia.</u>

Kind regards,

EGLE FOIA