



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

December 20, 2017

Mr. Kris Hinskey
Arcadis of Michigan, LLC
28550 Cabot Drive, Suite 500
Novi, Michigan 48377

RECEIVED DEC 29 2017

Dear Mr. Hinskey:

SUBJECT: Ford Livonia Transmission Plant – Target Detection Limit (TDL) Request
36200 Plymouth Road; Livonia, Wayne County, Michigan
DEQ Site ID No. 82002970

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), has completed the review of site-specific screening levels as requested in your November 17, 2017, communication received by the DEQ on November 21, 2017. Based upon our review of the established site-specific screening levels for the Facility and the related sections or Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection, 1994 PA 451, as amended, it is confirmed that in accordance with Sec. 20120a(10), when the TDL for a hazardous substance is greater than the developed cleanup criterion, the criterion is the TDL.

Sincerely,

Brandon Alger, Project Manager
Southeast Michigan District Office
Remediation and Redevelopment Division
586-753-3826
algerb@michigan.gov

Enclosure

cc: Mr. Todd Walton, Ford Motor Company
Ms. Cyndi Mollenhour, DEQ
Mr. Shane Morrison, DEQ
Mr. Paul Owens, DEQ
Mr. Gerald Tiernan, DEQ



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Enclosure

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MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

CALL NOTES

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FROM: Brandon Alger, Southeast Michigan District Office
Remediation and Redevelopment Division

DATE: December 13, 2017

SUBJECT: Ford Livonia Transmission Plant, 36200 Plymouth Road
Call with Cyndi Mollenhour, Regarding Consent Decree Criteria and TDLs

ATTENDEES:
Brandon Alger, MDEQ – RRD
Cyndi Mollenhour, MDEQ – C&E

In response to a December 7, 2017 email regarding Target Detection Limits and a proposed groundwater screening criteria. Cyndi called to inform that C&E held the position that the Consent Decree is a 201 settlement and so Part 201 does apply. This would mean that Footnote M, referenced by Shane Morrison in a December 7, 2017 email, would also apply. Due to this the Target Detection Limit becomes the cleanup criterion, as established in Section 20120a(10).

From: [Tiernan, Gerald \(DEQ\)](#)
To: [Alger, Brandon \(DEQ\)](#)
Cc: [Mollenhour, Cyndi \(DEQ\)](#); [Reed, Krista \(DEQ\)](#)
Subject: RE: RE - Ford Livonia Transmission Plant Site-Specific Criteria Evaluation
Date: Monday, December 11, 2017 1:49:01 PM

Hello Cyndi,

Does C&E have a take on this matter?

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Gerald Tiernan, C.P.G.
Asst. District Supervisor
Michigan Department of Environmental Quality
Remediation and Redevelopment Division
Southeast Michigan District Office
517-582-0520

From: Alger, Brandon (DEQ)
Sent: Thursday, December 7, 2017 3:53 PM
To: Tiernan, Gerald (DEQ) <TIERNANG@michigan.gov>
Cc: Mollenhour, Cyndi (DEQ) <MOLLENHOURC@michigan.gov>; Reed, Krista (DEQ) <REEDK@michigan.gov>
Subject: RE: RE - Ford Livonia Transmission Plant Site-Specific Criteria Evaluation

Jerry,

You were attached on Shane's response. I verified with the Part 201 Section Shane referenced, which reads:

Sec. 20120a

(10) If the target detection limit or the background concentration for a hazardous substance is greater than a cleanup criterion developed for a category pursuant to subsection (1), the criterion shall be the target detection limit or background concentration, whichever is larger, for that hazardous substance in that category.

Note, Subsection 1 referenced above:

(1) The department may establish cleanup criteria and approve of remedial actions in the categories listed in this subsection. The cleanup category proposed shall be the option of the person proposing the remedial action, subject to department approval if required, considering the appropriateness of the categorical criteria to the facility. The categories are as follows:

- (a) Residential.*
- (b) Nonresidential.*
- (c) Limited residential.*
- (d) Limited nonresidential.*

To me that's pretty cut and dry that for a Part 201 response the criteria "...shall be the target detection limit..." in this case, 1 ug/L for TCE and VC. Does the fact that despite using Part 201 as the structure of which response activities are based, the Consent Decree is not technically Part 201,

does this change our approach? Do we need to discuss this with C&E (CC'd) staff before providing Ford a response? I believe that would be preferable given the expected impact of how much a 0.12 ug/L vs 1.0 ug/L SSSL changes things.

According to Toxicology the TDL is the criteria for Part 201, but does that apply here as it normally would under a standard Part 201 facility?

Brandon

From: Morrison, Shane (DEQ)
Sent: Thursday, December 07, 2017 2:44 PM
To: Alger, Brandon (DEQ)
Cc: Williams, Matthew (DEQ); Flaga, Christine (DEQ); Tiernan, Gerald (DEQ); Mollenhour, Cyndi (DEQ)
Subject: RE: RE - Ford Livonia Transmission Plant Site-Specific Criteria Evaluation

Hi Brandon,

We have updated Footnote (M) on the site-specific evaluations to address this concern:

- Footnote M: Site-specific criterion may be below target detection limits (TDL). In accordance with Sec. 20120a(10) when the TDL for a hazardous substance is greater than the developed cleanup criterion, the criterion is the TDL.

This was the original intent and is allowed by statute so there should not be problem proceeding with the TDLs. Let me know if you have any further questions.

Best,
Shane

Shane Morrison, PhD
Toxicologist
Remediation and Redevelopment Division
Michigan Department of Environmental Quality
517-284-5063 | MorrisonS5@michigan.gov

From: Alger, Brandon (DEQ)
Sent: Thursday, December 07, 2017 2:34 PM
To: Morrison, Shane (DEQ) <MorrisonS5@michigan.gov>
Cc: Williams, Matthew (DEQ) <WILLIAMSM13@michigan.gov>; Flaga, Christine (DEQ) <FLAGAC@michigan.gov>; Tiernan, Gerald (DEQ) <TIERNANG@michigan.gov>; Mollenhour, Cyndi (DEQ) <MOLLENHOURC@michigan.gov>
Subject: RE: RE - Ford Livonia Transmission Plant Site-Specific Criteria Evaluation

Shane, et al.,

A few months ago your team helped me by developing site specific criteria for the Ford Livonia Transmission Plant (thanks again). Shortly thereafter, Ford entered into a Consent Decree with the MDEQ regarding the contamination related to their Livonia Transmission Plant. As part of the Consent Decree we used the site specific numbers which your group provided to us for our COC Screening Levels (See attached file Attachment DPDF). Please note that the site-specific screening levels for Trichloroethylene (TCE) and Vinyl Chloride (VC) are below the Target Detection Limits (TDLs) in the MDEQ RRD's listed in the 2016 Target Detection Limit and Designated Analytical Methods document.

Ford has since provided the department with a request to use the MDEQ TDLs for TCE and VC of 1 ug/L as the groundwater screening level protective of the VIAP, citing our published 2016 TDLs. (See attached file Remediation InvestigationPDF)

What is your team's thoughts on this matter?

Regards,

Brandon Alger

Geologist/Project Manager

Michigan Department of Environmental Quality

Remediation and Redevelopment Division

Phone: (586)753-3826

Email: algerb@michigan.gov

From: Morrison, Shane (DEQ)

Sent: Wednesday, August 09, 2017 9:46 AM

To: Alger, Brandon (DEQ)

Cc: Klann, Rhonda (DEQ); Williams, Matthew (DEQ); Flaga, Christine (DEQ); Tiernan, Gerald (DEQ)

Subject: RE - Ford Livonia Transmission Plant Site-Specific Criteria Evaluation

Hi Brandon,

Attached is the site-specific evaluation that you requested for Ford Livonia Transmission Plant. Let me know if you have any questions or concerns.

Best,

Shane

Shane Morrison, PhD

Toxicologist

Remediation and Redevelopment Division

Michigan Department of Environmental Quality

517-284-5063 | MorrisonS5@michigan.gov

DES RRD

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
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Arcadis, on behalf of BP
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Novi, MI 48377

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