STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

RICK SNYDER
GOVERNOR

C. HEIDI GRETHER
DIRECTOR

August 25, 2018

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

Dear Mr. Walton:

SUBJECT: Compliance with Consent Decree No. 2:1712372-GAD-RSW
Response Activity Plan-Remedial Investigation
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, has reviewed the Response Activity Plan-Remedial Investigation submitted by Ford Motor Company(Ford) in accordance with Section 6.7 of the Consent Decree entered into by the MDEQ and Ford on July 27, 2017. The response activity plan for conducting remedial investigations was submitted by Arcadis of Michigan, LLC on the behalf of Ford on April 13, 2018. Section 13.2 of the Consent Decree requires MDEQ to review the submission and (a) approve the submission; (b) approve the submission with modifications; or (c) disapprove the submission and notify the Defendant of the deficiencies in the submission.

Based on MDEQ review, the Response Activity Plan-Remedial Investigation is approved with the following modifications:

- **Section 1 – Schedule**: Modify proposed schedule for the investigation of the utility corridors to include three steps based on the time necessary to perform each step:
    1. 1-2 months for investigations that include: closed-circuit television; diversion chamber sediment samples; systematic evaluation for development of sampling program.
    2. 1-2 months to design a sampling program based on the evaluation of data from the investigation proposed in step one.
    3. 2-4 months for completion of a sampling program and results of the risk assessment conducted for the utility corridors.
- ❖ Ford may set dates above as necessary or required based on their work plan, but the total period of all three tasks is not to exceed six (6) months, as currently proposed in the Response Activity Plan for conducting remedial investigations.
- **Section 2 – On-site Remedial Investigations:** On-site groundwater samples collected as part of routine monitoring shall be compared to site-specific criteria for

the volatilization to indoor air pathway, or the analytical method target detection limits where appropriate in addition to the drinking water criteria.

- **Section 2** – **Potential Source (PS)-2 Evaluation (Figure 4):** Additional borings are needed within the interior of the Livonia Plant Transmission building to further identify the locations of potential sources beneath the building, between potential sources PS-2 and PS-6, as identified on Figure 4, based upon the high method detection limits for samples collected from the series of borings identified as LMW-15
- **Section 2 – Northwest Corner Evaluation (Figure 6):** The four to six borings beneath the structure identified as proposed "adaptive borings" should be identified as proposed borings. If delineation of the contamination is determined insufficient based on observations during the construction of these four to six borings, additional adaptive borings should be added as necessary.
- **Section 4 – Off-Site Remedial Investigations (parallel to proving model in 6.6b):**
    - To prove the groundwater plume model, additional monitoring wells will be added between the location where the groundwater contaminant plume has been delineated to the extent that the concentrations in groundwater are less than the analytical method target detection limits, and the 100' lateral inclusion zone. The monitoring wells will be added at intervals, as required to prove the model. If contamination in the groundwater is found above site-specific criteria or analytical method target detection limits, whichever is appropriate, this will initiate modifications to the groundwater plume model and the establishment of a new 100' lateral inclusion zone. All properties within the newly established 100' lateral inclusion zone will be incorporated into the area to be investigated.
    - To prove the model, Ford shall add nested or paired groundwater monitoring wells at the locations of the existing monitoring wells that are not currently screened to interest the top of the water table and are being used by Ford to extrapolate vinyl chloride levels to the analytical method target detection limit or assess plume stability. The monitoring wells will be monitored and sampled in accordance with the MDEQ 2013 VI Guidance document as part of the continuing site investigation to determine the stability of the groundwater plume.
- **Section 4 – Proposed Groundwater Sampling Response Activity Plan:** For data validation, a minimum of 10% of the samples collected and analyzed by the mobile laboratory shall have duplicates submitted and analyzed at a fixed laboratory.
- **Section 4 – North of LTP Property:** Place a boring north of the boring identified as HPT-179 to delineate (soil, groundwater or both) contamination in this area. It may be appropriate to place the boring on the Ford-Livonia Transmission Plant property, with proposed off-site adaptive borings.
- **Section 5 – Routine Monitoring:** The data for groundwater samples from on-site monitoring wells collected as part of routine monitoring shall be compared to site-specific criteria, or analytical method target detection limits where appropriate, in addition to the drinking water criteria.
- **Section 8 – Off-site Residential and Irrigation Wells:** Ford shall notify the MDEQ and the City of Livonia of the presence and location of existing residential or irrigation wells and, according to Section 6.7 of the Consent Decree, Ford shall also provide a plan to the MDEQ for obtaining permission from the respective property owners for the subsequent abandonment of the wells, if determined appropriate.

This shall be done within 30 days of discovery of a well. This includes the currently known well east of Stark, if any future sampling indicates impact to this well above relevant criteria.

- **General Comment:** Acknowledge and incorporate the necessary requirements to prove the groundwater plume model as proposed in MDEQ's review comments provided in response to the submittal of the Response Activity Plan-Vapor Intrusion.
- **General Comment:** While the response activity plan for conducting remedial investigations notes this, the MDEQ further stresses the need for adaptive borings, both for density and location, based on observations made in the field and evaluation of laboratory gathered during the ongoing and proposed investigations.

If the above modifications are not undertaken or accomplished, the MDEQ's approval with modifications of the Response Activity Plan-Remedial Investigation is withdrawn. The MDEQ's approval with modifications is also contingent upon **Ford Motor Company**'s timely implementation of these response activities, in accordance with the schedule provided in the Response Activity Plan-Remedial Investigation.

MDEQ's approval with modifications of the submission (Response Activity Plan-Remedial Investigation) with modifications is based upon the representations and information contained in the submittal, therefore the MDEQ expresses no opinion as to whether other conditions that may exist will be adequately addressed by the proposed response activities. Notwithstanding this approval with modifications, if environmental contamination is found to exist that is not addressed by the Response Activity Plan-Remedial Investigation and Ford is otherwise liable for the contamination, additional response activities may be necessary.

If Ford should have further questions or concerns, please contact Brandon Alger, Remediation Division, Southeast Michigan District Office, at 586-753-3826.

Sincerely,

Paul Owens, District Supervisor
Southeast Michigan District Office
Remediation and Redevelopment Division
586-235-6990
OwensP@michigan.gov

cc: Mr. Kris Hinskey, Arcadis of Michigan, LLC
Mr. Brian Negele, MDAG
Mr. Darren Bowling, MDEQ
Ms. Cyndi Mollenhour, MDEQ
Mr. Travis Boeskool, MDEQ
Ms. Beth Vens MDEQ
Mr. Brandon Alger, MDEQ