



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

November 27, 2018

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  
DEQ Site ID No. 82002970

The Michigan Department of Environmental Quality (MDEQ), Remediation and Redevelopment Division (RRD) staff met with Ford Motor Company representatives and their consultant, Arcadis U.S., Inc. representatives on November 19, 2018, in Lansing, Michigan. The purpose of the meeting was to discuss on-going field work from implementation of the "Response Activity Plan – Vapor Intrusion Evaluation" (Plan) dated April 13, 2018, as modified by the DEQ approval letter dated August 30, 2018, for the Ford Livonia Transmission Plant site, focusing on the off-site properties.

As required by the Plan, the field work is being conducted to collect sufficient information and the data necessary to evaluate the volatilization to indoor air pathway (VIAP) for the off-site residential properties. As we discussed at the meeting, RRD staff have been reviewing data as it is submitted, and several areas were noted where implementation of the Plan differed with RRD's standard operating procedures for the VIAP. We discussed these areas in depth at our meeting and agreed upon the following:

- Depth to groundwater, determined by using monitor well static water levels, is shallow and precludes the use of soil gas wells to collect representative samples at many properties. The installation of shallow monitor wells, with screens intersecting the groundwater table, will provide the most representative and reliable data to assess the VIAP adequately. Ford agreed to install these wells to assess VIAP and sample them before December 31, 2018.
- Many homes have sumps, full basements, partial basements, or a combination which allow for shallow groundwater to be in contact with the structure. For these homes the installation of shallow monitor wells, with screens intersecting the groundwater table, will provide the most representative and reliable data to assess the VIAP adequately. Ford agreed to install these wells to assess VIAP and sample them before December 31, 2018. Ford should review all information on off-site properties and

December 31, 2018. Ford should review all information on off-site properties and determine which properties have sumps, full basements or partial basements or a combination, and ensure that the top of the groundwater table is adequately characterized for all these properties.

- Homes with crawl spaces require assessment of the VIAP in the sub-surface. This can be done with soil-gas wells under the homes when conditions permit for the successful installation and sampling of sub-slab soil gas. However, due to shallow groundwater, the installation of shallow monitor wells, with screens intersecting the groundwater table, may provide the most representative data to assess the VIAP adequately. Ford agreed to install soil gas wells or monitor wells and sample them before December 31, 2018 for homes with crawl spaces.
- Based on results submitted to date, 12001 Stark had an exceedance of criteria in the sub-slab monitoring point within the garage. There were some issues with the chain of custody for this sample. Ford agreed to re-sample this sub-slab point as soon as possible, with results provided no later than December 31, 2018.

RRD staff are reviewing in-coming data on an on-going basis and have detected some discrepancies with chain of custody not matching canister information and missing signatures, dates, etc. Ford should review all current data and ensure proper quality assurance/quality control (QA/QC) procedures were implemented and adhered to in all steps of the sample collection and analysis process. If the review of data or QA/QC for any one sample raises questions or identifies problems, a new sample should be collected following the appropriate protocols. Any and all resampling should be done prior to December 31, 2018.

If you should have further questions or concerns, please contact Brandon Alger, Project Manager, Southeast Michigan District Office, RRD, MDEQ, 27700 Donald Court; 586-753-3826; algerb@michigan.gov; or you may contact me.

Sincerely,



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Remediation and Redevelopment Division  
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cc: Mr. Kris Hinskey, Arcadis  
Mr. Brian Negele, MDAG  
Mr. Darren Bowling, MDEQ-C&E  
Ms. Cyndi Mollenhour, MDEQ-C&E  
Ms. Beth Vens MDEQ-RRD  
Mr. Brandon Alger, MDEQ-RRD