



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

F



LIESL EICHLER CLARK
DIRECTOR

February 19, 2019

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), received correspondence dated January 26, 2019 from Ford Motor Company that provided responses to the MDEQ correspondence dated December 28, 2018. The December 28, 2018 MDEQ correspondence listed data errors from the implementation of the "Response Activity Plan – Vapor Intrusion Evaluation" approved with modifications on August 30, 2018, as part of the July 27, 2017 Consent Decree between the MDEQ and Ford Motor Company. The January 26, 2019 correspondence does resolve numerous data issues for the MDEQ, but the MDEQ does not concur that "over 97%" of the data are valid. Specific data issues where there is agreement and where additional sampling is needed to further assess data are listed below.

The responses provided in the January 26, 2019 correspondence from Ford Motor Company for the following items have resolved these data issues:

- All indoor and ambient air samples and soil-gas samples will be collected using a canister with an initial vacuum of 26 in. Hg. at a minimum. It was agreed that samples collected previously with an initial vacuum lower than 26 in. Hg are invalid.
- All indoor and ambient air samples with a final canister pressure of 0 in. Hg at sample collection are invalid. Samples from the first round with a final canister pressure of 0 in. Hg. will be resampled.
- It was agreed lab sheet entries and corrections will be legible and initialed by the person making the correction and all entries will be reviewed and valid.
- It was agreed that sampling air within crawl spaces is not representative of the volatilization to indoor air pathway and will not be repeated.

- It was agreed that sampling of sump water is not representative of the volatilization to indoor air pathway and will not be repeated.
- An adequate technical response for the purge rate and volume was provided.
- A technical evaluation of indoor and ambient air samples with canister vacuum between <2 in. Hg and 10 in. Hg determined these samples were representative.
- Additional sampling of non-residential buildings will match working shifts to indoor air sample collection duration.

The responses provided in the January 26, 2019 correspondence from Ford Motor Company for the following items do not resolve the data quality concerns and the data is not considered valid. This data will need to be verified by subsequent sampling rounds and the need to conduct an additional sampling event will be evaluated based on the results of the subsequent sampling events:

- Samples where there were discrepancies with the chain of custody (column 1-3 on the spreadsheet attachment to the MDEQ correspondence). The chain of custody is a form that should not be altered or revised.
- Samples where helium leak testing was not performed pre- or post-sampling.
- Samples where helium leak testing indicated a leak.
- Indoor and ambient air samples where canister vacuum was <2 in. Hg.
- Indoor and ambient air samples where canister vacuum was >10 in. Hg.

The November 27, 2018 Eurofins lab report references issues with the "Sample SSMP-34766Standish-04_103018" sample. This is potentially due to mislabeled field notes and this location will need to be verified by subsequent sampling rounds.

The photo ionization detector used to take ambient air readings and readings from sub-slab monitoring points did not correlate with laboratory analytical data. It was stated it is suspected this was from dust or moisture; further sampling will provide additional data to review this issue in greater detail.

It is recommended that for 24 hour indoor and ambient air samples that the canisters be checked during the sampling process to ensure sample collection is proceeding properly. The MDEQ typically checks canisters halfway through the sampling process to ensure a sample will be representative.

Mr. Todd M. Walton
Ford Motor Company

3

February 19, 2019

If you should have further questions or concerns, please contact Ms. Beth Vens, Assistant District Supervisor, at 586-753-3825 or vensb@michigan.gov; or Brandon Alger, Project Manager, Southeast Michigan District Office, MDEQ, RRD, 27700 Donald Court, Warren, Michigan 48092, at 586-623-2839 or algerb@michigan.gov; or you may contact me.

Sincerely,



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

cc: Mr. Kris Hinskey, Arcadis U.S., Inc.
Mr. Shawn Collins, The Collins Law Firm, PC
Mr. Paul Bernier, City of Livonia
Ms. Maureen Franklin, Wayne County DHVCW
Senator Dayna Polehanki
Representative Laurie Pohutsky
Mr. Brian Negele, MDAG
Mr. Aaron Cooch, MDHHS
Ms. Alexandra Rafalski, MDHHS
Mr. Darren Bowling, MDEQ
Ms. Cyndi Mollenhour, MDEQ
Ms. Beth Vens MDEQ
Ms. Krista Reed, MDEQ
Mr. Brandon Alger, MDEQ