



STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE

**EGLE**

GRETCHEN WHITMER  
GOVERNOR

LIESL EICHLER CLARK  
DIRECTOR

July 8, 2019

Received July 9, 2019  
mw

Ford Motor Company  
c/o Mr. Todd Walton  
290 Town Center Drive, Suite 800  
Dearborn, Michigan 48126

Dear Mr. Walton:

SUBJECT: Re: Response Activity Plan – Utility Corridor Evaluation  
Received Date: February 28, 2019  
Ford - Livonia Transmission Plant, 36200 Plymouth Road, Wayne County  
Site ID No.: 82002970

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division has reviewed the "Response Activity Plan – Utility Corridor Evaluation" (ResAP) as required under Section 6.7(a)(v) of the Consent Decree, No. 2:1712372-GAD-RSW, received by EGLE on February 28, 2019. The ResAP describes the remedial investigations Ford Motor Company (Ford) is proposing to undertake both on-site and off-site related to the utility corridors at the Area of Concern (AOC). The plan included a narrative describing the activities performed and planned for inclusion in future investigation of the utility corridors.

The ResAP for the Facility at 36200 Plymouth Road, Livonia and associated AOC is disapproved. In accordance with Section 6.7(a)(v) the ResAP is required to address "*the impacted storm sewer and any potentially impacted utility corridors...*" and characterize the "*potential for preferential vapor intrusion pathways along [all] utility corridors.*" EGLE has the following comments with respect to the ResAP as submitted:

- Ford's position is that the utility corridors are not preferential migration pathways for Volatilization to Indoor Air Pathway (VIAP) or Groundwater-Surface Water Interface (GSI) Pathway, due to the permeability of native soils. Ford must demonstrate, within the submitted ResAP, that characterization indicates trench backfill permeability and transmissivity properties are adequate, and Ford needs to clearly articulate the effect of this similar permeability on contaminant migration via groundwater.
- Ford does not address the potential for vapor migration within the sewer system. The ResAP needs to include a discussion regarding the fate of these vapors with a focus on potential exposure risk.
- Ford must investigate if there a potential for contaminated groundwater to enter the storm sewers. Ford is required to provide an assessment of the VIAP and GSI pathway and, if relevant, how they will be addressed.
- Ford shall include in the ResAP information about what happens down-gradient of the diversion chambers. It is understood that under baseline flow conditions water within the sewer system on the Ford property enters into the Great Lakes Water Authority system, as a permitted discharge; however, Ford is unclear in the ResAP about what happens under storm conditions causing a Combined-Sewer Overflow (CSO) event and the steps that have been taken and will be taken to assure compliance, with the GSI pathway under Part 201, during CSO events.

- According to the ResAP, Ford's proposes to continue the permitted discharge, as agreed upon with GLWA; however, upon lining the storm sewer the dissolved phase groundwater plume will still be present. What protections and plans are in place to assure this does not lead to off-site migration of contaminated groundwater or inadequate treatment and capture by the existing system?
- Contaminated sediment materials in manholes can be a continuing source of dissolved contamination in groundwater. Sediment within the manholes both on and off the Ford property will need to be sampled and analyzed to determine the presence or absence of contamination. Pending the sample results, it may be necessary for Ford to remove the contaminated sediments from the catch basins.

In accordance with Section 13.3, Ford shall correct the deficiencies and provide a revised ResAP to EGLE for review and approval within thirty (30) days. Ford shall proceed to take the actions and perform the response activities not directly related to the deficient portion(s) of the ResAP. Any stipulated penalties applicable to the delivery of the ResAP shall accrue during the thirty (30) day period but shall not be assessed unless the resubmitted ResAP is also disapproved and EGLE demands payment of the stipulated penalties pursuant to Section XV of the Consent Decree.

If you have any questions or concerns, please contact Brandon Alger at [algerb@michigan.gov](mailto:algerb@michigan.gov); 586-623-2839, or Beth Vens at [vensb@michigan.gov](mailto:vensb@michigan.gov); 586-484-1030.

Sincerely,



Paul Owens, District Supervisor  
Warren District Office  
Remediation and Redevelopment Division  
586-235-6990  
[owensp@michigan.gov](mailto:owensp@michigan.gov)

cc: Senator Dayna Polehanki  
Representative Laurie Pohutsky  
Mr. Paul Bernier, City of Livonia  
Ms. Maureen Franklin, Wayne County DNVCW  
Mr. Shawn Collins, The Collins Law Firm, PC  
Ms. Alexandra Rafalski, DHHS  
Ms. Beth Vens, EGLE  
Mr. Brandon Alger, EGLE