



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 23, 2019

*Received 10/3/19  
TWW*

Ford Motor Company  
c/o Mr. Todd Walton  
Fairlane Plaza North, 8F  
290 Town Center Drive, Suite 800  
Dearborn, Michigan 48126

Dear Mr. Walton:

SUBJECT: 12400 Belden Court and 11675 Belden Court, Livonia  
Ford - Livonia Transmission Plant, 36200 Plymouth Road, Wayne County  
Site ID No.: 82002970; Consent Decree No. 2:17112372-GAD-RSW

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division has reviewed the "Response to EGLE Comments on Data from 12400 Belden Court And 11675 Belden Court" correspondence. This correspondence dated July 25, 2019, was submitted by Arcadis on Ford Motor Company's (Ford) behalf.

At 12400 Belden Court and 11675 Belden Court there are multiple detections of solvents in indoor air samples which exceed the media specific screening levels and sub-slab soil gas concentrations which exceed site-specific criteria. Exceedances of the soil gas criteria indicates a sub-slab source of contamination for potential indoor air exceedances is present. Documentation provided by Ford indicates there is a source of volatiles used within the business and that this is an additional potential source of the indoor air detections of solvents. It is possible that the detections of solvents in the indoor air samples are from both the sub-slab source and the interior chemical use. The source of the sub-slab solvents has not been identified to date.

The July 25, 2019, correspondence states monitor wells in the area do not have detections of the solvents however these wells are located at some distance from the businesses. To accurately assess groundwater conditions at the individual properties, Ford is requested to install monitor wells with screens intersecting the groundwater table upgradient and adjacent to these businesses. These monitor wells should be sampled quarterly to provide data that can be evaluated to determine if groundwater is a potential source of the solvents in the soil gas and indoor air.

In accordance with Section 6.1(b) of the Consent Decree, Ford shall identify and address conditions that require response activities necessary to mitigate any immediate public health risks, within the Area of Concern, resulting from volatilization to indoor air of chemicals of concern, from all environmental media. EGLE asks that Ford further investigate and evaluate the source(s) of the sub-slab and indoor air contamination and

further evaluate groundwater conditions. If this evaluation indicates that contamination is related to or comingled with Ford's plume, Ford shall take immediate action to address the soil-gas and indoor air exceedances at 11675 Belden Court and 12400 Belden Court and identify the expedited schedule these actions will be undertaken in the monthly interim mitigation system submittals. Please be advised EGLE is in communication with the Department of Health and Human Services regarding these indoor air concentrations.

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  
Mr. Anthony Matlock, Wayne County DHVCW  
Mr. Shawn Collins, The Collins Law Firm, PC  
Ms. Alexandra Rafalski, DHHS  
Ms. Beth Vens, EGLE  
Mr. Brandon Alger, EGLE