



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 17, 2019

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: August 9, 2019
Ford - Livonia Transmission Plant
36200 Plymouth Road, Livonia, Wayne County, Michigan
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) received by EGLE on August 9, 2019, as required under Section 6.7(a)(v) of the Consent Decree, No. 2:1712372-GAD-RSW. 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). Based on EGLE's review, the ResAP is disapproved. EGLE has identified the following deficiencies with the ResAP:

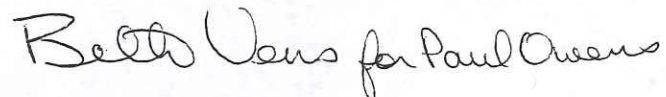
1. EGLE is unable to determine whether Ford's proposed actions will comply with Section 20120(e)(19) which addresses discharges to surface water, specifically storm sewers.
 - a. The information provided is insufficient to allow EGLE to determine whether the vinyl chloride and/or other COC's entering the sewer are discharging at the compliance point. Ford needs to understand both the compliance point location(s) and the COC levels in the sewer system in order to determine and/or demonstrate they are complying with discharges that might be entering "waters of the state." Ford must also demonstrate they are in compliance with local discharge requirements such as municipal separate storm sewer systems (MS4s) permits.
 - b. The maps show two types of sewers, combined and apparent direct discharge storm sewers, with no obvious reference to flow direction or the ultimate fate of water entering/moving through each sewer under all conditions. Compliance with the groundwater surface water interface pathway is determined where storm waters discharge to waters of the state, above Part 31 surface water quality standards for the COC's. EGLE was unable to locate these compliance points based on the information submitted. Please show where the compliance points are and whether compliance has been achieved.
 - c. The information provided indicates there are sewers that tie into various structures and in some cases appear to discharge into storm sewers that may go directly to surface waters. Information is needed to better understand where stormwater flows after these structures and how these structures might affect the levels of COC's.

2. Ford needs to complete a comprehensive and unbiased assessment of vapors in the sewers. The approach stated in the ResAP to collect "*sediment, baseflow water, and vapor sampling of a select number of manholes that directly interface with offsite impacted groundwater*" is neither comprehensive nor unbiased. Ford needs to provide the proposed frequency, location, and methodology for sampling vapors in the storm sewers. The proposed approach needs to provide the collection of sufficient data to understand the risks associated with these potential vapors in the sewers.
3. The proposed ResAP includes both investigation activities and proposed remedial actions, such as lining of the sewer. While the remedial actions may be effective, EGLE cannot approve of a plan that includes remedial actions and investigation activities when the remedial actions may be contingent upon the investigation results. Until there exists a clear understanding of the compliance requirements, such as where the compliance point is located within the sewer system and whether Ford is meeting the compliance requirements, remedial actions should not be included in a ResAP for Remedial Investigation.

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. Stipulated penalties will continue to accrue from the date of the first denial (July 8, 2019) until an approvable ResAP is submitted.

If you have any questions, concerns, or would like to meet with EGLE to discuss, please contact Brandon Alger at algerb@michigan.gov; 586-623-2839, or Beth Vens at vensb@michigan.gov; 586-484-1030.

Sincerely,



Paul Owens, District Supervisor
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Remediation and Redevelopment Division
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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