



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 3, 2020

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

Dear Mr. Walton:

SUBJECT: Interim Groundwater Monitoring Plan
Ford Transmission Plant
36200 Plymouth Road, Livonia, Wayne County, Michigan, 48150
EGLE Site ID Number: 82002970

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division reviewed the "Interim Groundwater Monitoring Plan" (Plan), submitted by Arcadis on behalf of Ford Motor Company (Ford) dated May 20, 2020. Pursuant to paragraph 22.1 of the Consent Decree No.2:1712372-GAD-RSW, a modification of any Submission or schedule required by this Order may only be made upon written approval of EGLE. Based on EGLE's review, the Plan it is not approved for the following reasons.

The Plan does not provide the technical basis or rationale for the request to reduce the quarterly groundwater sampling. The purpose of each well, what the data shows for that well, and the rationale for the change in groundwater sampling frequency is required for EGLE to conduct an evaluation to determine if reducing sampling is appropriate.

The Plan does not contain adequate data to establish groundwater trends in the wells. Various groundwater conditions can affect contaminant concentrations and the plume migration direction. The data collected to date is insufficient to make this analysis. It is the experience of EGLE staff that multiple years (5-10) are often needed to establish groundwater trends. Groundwater temperature may also affect contaminant concentrations. Future proposals to alter the groundwater monitoring program must assess groundwater fluctuations, and all other relevant factors for their influence on contaminant concentrations.

The information needed by EGLE will depend upon the wells and their objective; however, additional information and trend analysis will be needed for all wells for which you propose to adjust monitoring frequency. Examples include:

1. Shallow interior plume wells installed to assess the Volatilization to Indoor Air Pathway (VIAP) and where mitigation systems are operating.
2. LMW-series for identification of NAPL.
3. Piezometer wells where transducer data will be used for Hydraulic Control Structure performance monitoring.

Note that boundary wells to the north, west, and south of the plume should also be evaluated for consistency in contaminant concentration, depth, and flow direction to determine if trends provide justification for a modification to monitoring protocol, at these locations.

If you have any questions please contact Ms. Beth Vens, Assistant District Supervisor, at vensb@michigan.gov, or at 586-753-3825; or Mr. Brandon Alger, Project Manager, at algerb@michigan.gov, or at 586-623-2839; or you may contact me.

Sincerely,



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

cc: Senator Dayna Polehanki
Representative Laurie Pohutsky
Mr. Paul Bernier, City of Livonia
Wayne County Health Department
Ms. Alexandra Rafalski, DHHS
Ms. Beth Vens, EGLE
Mr. Brandon Alger, EGLE