



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 22, 2020

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

Dear Mr. Walton:

SUBJECT: Monthly Updates on Offsite Mitigation Systems related to the
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 has reviewed the "Offsite Interim Preemptive Mitigation Installation Monthly Update" memorandums (Memos) dated June 30, 2020, July 31, 2020, and August 31, 2020 regarding preemptive mitigation systems for properties in the adjacent Alden Village Subdivision. Memos have been reviewed and EGLE has the following comments:

- **34682 Beacon** – Ford has noted that additional work will be completed at this property to address EGLE concerns that monitoring points do not indicate adequate depressurization or comply with requirement that pressure needs to be demonstrated across the entire structure. The July 2020 memo indicates that a "normal" vacuum reading at one sub-slab monitoring point (SSMP) is -0.005 inches water column (iwc). This does not meet EGLE performance metrics which require a minimum sustained pressure of -0.020 iwc and does not allow for minor system fluctuations or allow for adequate response times to ensure the mitigation system is reliable and effective. This should be corrected on an expedited basis and results reported in the next monthly Memo. Additionally, Ford needs to work with the homeowner to access SSMP-1 and SSMP-4 to verify that performance metrics are met.
- **34990 Beacon** – Mitigation has not been completed for the detached garage. The Memos state the homeowner was provided an alternative mitigation design for approval. Ford must confirm acceptance of plans and intent to mitigate the detached garage and report progress to EGLE in the September Memo. Indoor air sampling is not an adequate demonstration of risk; the structure requires mitigation. Continue to monitor vacuum to verify vacuum is being maintained.
- **12100 Boston Post** – Currently the system is not maintaining EGLE's guidance for vacuum performance metrics at all sub-slab monitoring points; specifically, at SSMP-2. Due to the COVID-19 Force Majeure suspension progress was delayed, but Ford is now expected to resolve this issue and report progress made in the September Memo. Indoor air sampling is not an adequate demonstration of effective mitigation. Monitoring for use

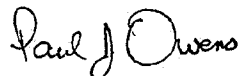
of the dilapidated uninhabited shed and continuing to request access to the shed to apply Retro-Coat™ should be continued.

- **12121 Boston Post** – It is understood that the property owner remains the only property not providing access for remedial investigation and action and Ford continues to pursue access to this property through legal means. Please continue to update EGLE with information in future monthly mitigation updates.
- **12131 Boston Post** – It was reported that moisture was detected on the geotextile of the mitigation system in February 2020. Ford has worked to resolve this and provided update in the Memos. Continue to update EGLE with information in future monthly mitigation updates. August data logs indicate vacuum at MP-4 is typically -0.002 iwc. This does not comply with EGLE vacuum performance metrics and does not allow for minor system fluctuations or allow for adequate response times to ensure the mitigation system is reliable and effective. Adjustments to the mitigation system should be made and information included in the next monthly mitigation update.
- **12141 Boston Post** – It was reported that data logs indicate vacuum at MP-4 is typically -0.005 iwc. This does not comply with EGLE vacuum performance metrics and does not allow for minor system fluctuations or allow for adequate response times to ensure the mitigation system is reliable and effective. Arcadis has adjusted the system and plans to report results once they are reviewed and evaluated. Continue to update EGLE with information in future monthly mitigation updates.
- **12036 Brewster** – The Jun-July 2020 data logs indicate two monitoring points where vacuum was not maintained, having typical vacuum pressure of 0.008 iwc; however, the August 2020 Memo reported consistent vacuum >0.020 iwc maintained at SSMP-2. Ford should continue to monitor reliability of the mitigation system, adjust as necessary, and update EGLE in the next monthly mitigation update.
- **12091 Brewster** – The property owners at 12091 Brewster are reported to have not provided Ford access for the necessary installation of Retro-Coat™ in the detached garage. The Memos indicate the homeowner is considering providing access for mitigation to detached garage with expected application in late fall of 2020. Ford shall continue to make efforts to obtain compliance at this property by the earliest date possible. Monitoring for use of the garage and continuing to request access with intent to apply Retro-Coat™ should be continued. Indoor air sampling is not an adequate demonstration of risk; the structure requires mitigation.
- **34424 Capitol** – Ford should continue to complete installation and optimization of mitigation system at this property and provide interim measures, such as the air purifying unit, until system can obtain and maintain adequate vacuum in the SSMP beneath the concrete slab.
- **34450 Capitol** – Ford indicates installation resumed on June 15, 2020 and the installation of a sub-membrane depressurization system was completed on July 23, 2020. This system is operational and meets performance metrics. Ford will complete installation on the detached garage and advise EGLE of progress in the next monthly Memo.

- **34644 Beacon** – The August Memo describes scheduling difficulties and that the post mitigation system August activities could not be conducted. Continue to keep EGLE updated and report on progress in the next monthly Memo.
- **12067 Boston Post** – electrical issues were present for much of August 2020 and it appears the issues have been corrected. The data log of the mitigation system vacuum should be carefully examined in the next monthly Memo.
- **Remaining Scheduled Installations** – Ford is required to complete installation at 34380 Capitol and 12124 Boston Post, as outlined in the August memo. Air purifiers have been supplied to 34380 Capitol as an interim measure. Ford states 12124 Boston Post declined the air purifier according to Ford. EGLE requests this offer be made again since due to the COVID-19 Force Majeure suspension progress has been delayed. With restrictions lifted EGLE expects Ford shall complete installation and optimization as conditions permit. Ford shall continue to update EGLE on progress at these homes.
- **Water on barriers** – homes at 34401 Capitol, 12067 Boston Post, 12066 Boston Post, 34591 Beacon and 34480 Capitol had water on the barrier in August. Evaluate the presence of this water and whether it affected the operation and effectiveness of the mitigation systems and include this assessment in the September Memo. Based on information provided in the August Memo, the EGLE vacuum performance metrics were negatively affected from the presence of the water. Steps should be taken to prevent this in the future.

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,



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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
Wayne County Health Department
Ms. Alexandra Rafalski, DHHS
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