



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 18, 2021

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

Dear Mr. Walton:

SUBJECT: Re: Interim Groundwater Monitoring Plan
Received Date: January 26, 2021
Ford - Livonia Transmission Plant
36200 Plymouth Road, Livonia, Wayne County, Michigan
Consent Decree No 2:1712372-GAD-RSW (CD)
Site ID No.: 82002970

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division has reviewed the Interim Groundwater Monitoring Plan (IGMP), received on January 26, 2021.

This IGMP indicates that Ford will continue their ongoing obligation of quarterly groundwater sampling, which Ford has met since 2017, with some proposed modifications to wells which are redundant, at upgradient off-site locations, or constructed for purposes not ideal for groundwater monitoring. The IGMP is approved with the following modifications:

- MW-26, MW-27, MW-28 will no longer be sampled.
- LMW-Series Wells (LMW-15-01 through LMW-15-10 and LMW-20-11 through LMW-20-28) will only be gauged for the presence of light non-aqueous phase liquid (LNAPL).
 - While Ford intends to keep the wells for gauging, EGLE reiterates the need to not abandon these wells. EGLE may require Ford to sample groundwater within these wells should results indicate a notable change in conditions.
- MW-202 through MW-206 and MW-202S through MW-206S, all of which are off-site, and up-gradient will be sampled annually.
 - EGLE supports sampling the upgradient, off-site wells on an annual basis; however, it should be noted that agreement of a modified sampling protocol does not equate to concurrence with an interim conceptual site

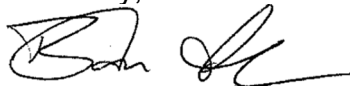
model of groundwater at the Roush property. EGLE may require Ford to modify this plan should results indicate a notable change in conditions.

- TW-16-01 and TW-16-02 will continue to be sampled quarterly.
 - TW-16-01 and TW-16-02 are useful for monitoring performance of the Hydraulic Control Structure (HCS). Ford will continue to sample TW-16-01 and TW-16-02 quarterly. Alternatively, Ford may consider installing monitoring wells to analyze groundwater concentrations upgradient and downgradient of the HCS. These wells, if screened appropriately, would functionally replace TW-16-01 and TW-16-02 and the TW-16 wells would no longer require sampling.
- Modifications to TW-16-03, TW-16-04 will continue to be sampled quarterly until Ford determines which well is most representative of groundwater at this location.
 - EGLE concurs that TW-16-03, and TW-16-04, and PW-16-02 are redundant; however, it is unclear from the submittal if the TW-series wells are less representative of groundwater at PW-16-02. Ford should provide information indicating which well is most representative of concentrations at this location.

Ford will continue to update and adjust the monitoring plan as necessary per the requirements of the 2017 Consent Decree. Results of groundwater monitoring should continue to be reported in the required quarterly reports.

If you have any questions, concerns, or would like to meet with EGLE to discuss, please contact me at algerb@michigan.gov or 586-623-2839.

Sincerely,



Brandon Alger, Geologist
Warren District Office
Remediation and Redevelopment Division

cc: Mr. Chuck Pinter, Ford Motor Company
Mr. Kris Hinskey, Arcadis of Michigan, LLC
Ms. Cyndi Mollenhour, EGLE
Ms. Beth Vens, EGLE
Mr. Paul Owens, EGLE
Mr. Steve Hoin, EGLE
Ms. Krista Reed, EGLE