



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 14, 2021

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

Dear Mr. Walton:

SUBJECT: Re: CSM and Requested Property Specific Monitoring Program for Five Offsite Mitigation Properties related to the Ford Livonia Transmission Plant
Received Date: February 22, 2021
Ford - Livonia Transmission Plant (LTP)
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 "CSM (*Conceptual Site Model*) and Requested Property Specific Monitoring Program for Five Offsite Mitigation Properties" memorandum, submitted by Arcadis of Michigan, LLC (Arcadis) on behalf of Ford Motor Company (Ford), on February 22, 2021. Section 13.2 of the Consent Decree requires EGLE to review and (a) approve the submission; (b) approve the submission with modifications; or (c) disapprove the submission and notify Ford deficiencies in the submission.

Based on EGLE review of the memorandum's proposed monitoring plan updates, the updates are approved with the following EGLE modifications:

- At 12091 Brewster, Ford should reference Section 5.3 of the VI Guidance and either show why a single point is acceptable or install a 2nd soil-gas point which will be monitored for 4 quarters. In the interim period, continued monitoring should be performed to determine need for mitigation.
 - Additionally, EGLE Guidance for VIAP Section 5.4.2 reads, "*For sites where a known source of vapors remains and the intent is to show that there is no risk of those vapors causing a vapor intrusion condition, four additional sampling events would be needed to adequately address the seasonal and temporal variability.*" As noted in the memo, Ford has not completed a 4th sampling event at any sub-slab monitoring point at 12091 Brewster. Ford will need to complete an additional sampling event for SSMP-01.

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- EGLE requires that the garage be monitored for use as interim response may need to be adjusted if evidence of occupancy is observed.
- At 34682 Beacon, MW-155S will be included as a conditional well, along with proposed wells MW-115S and MW-154S.
- At 12100 Boston Post, MW-156S will be included as a conditional well, along with proposed wells MW-115S and MW-19SR.
- At 34424 Capitol Ford should reference Section 5.3 of the VI Guidance and either show why a single point is acceptable or install at least 2 soil-gas points for each structure. These will be monitored for 4 quarters. In the interim period, continued monitoring should be performed to determine need for mitigation. MW-148S and MW-90S will be included as conditional wells, along with proposed wells MW-103S, MW136S, and MW-169S.
- At 34450 Capitol, MW-108S will be included as a conditional well, along with proposed wells MW-137S, MW168S, and MW-169S.
- In addition to the above adjustments, it is required that all soil-vapor points which are used in updating CSMs adhere to the 2013 EGLE VI Guidance Document regarding placement. Vapor pin placement must be 5-feet or more from exterior walls. Ford should verify this and reinstall and resample any pins which do not meet placement requirements.

If you have any questions or concerns, please contact me at AlgerB@Michigan.gov or 586-623-2839.

Sincerely,



Brandon Alger, Geologist
Warren District Office
Remediation and Redevelopment Division
586-623-2839
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cc: Mr. Chuck Pinter, Ford Motor Company
Mr. Kris Hinskey, Arcadis of Michigan, LLC
Ms. Alexandra Rafalski, DHHS
Ms. Cyndi Mollenhour, EGLE
Ms. Beth Vens, EGLE
Mr. Paul Owens, EGLE
Mr. Joshua Scheels, EGLE
Ms. Krista Reed, EGLE