



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 2, 2021

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

Dear Mr. Walton:

SUBJECT: Re: Utility Corridor Analytical Results
Received Date: May 05, 2021
Ford - Livonia Transmission Plant (LTP)
36200 Plymouth Road, Livonia, Wayne County
Consent Decree No 2:1712372-GAD-RSW (CJ)
Site ID No.: 82002970

The Department of Environment, Great Lakes & Energy (EGLE), Remediation and Redevelopment Division has reviewed the "Utility Corridor Analytical Results" memorandum (memo) submitted by Ford Motor Company (Ford) on May 05, 2021. Ford has been conducting a remedial investigation (RI) for the utility corridor in Plymouth Road pursuant to Section 6.7(a)(v) of the Consent Decree No. 2:21712372 Ford entered with EGLE on July 21, 2017 (CD). EGLE approved the Response Activity Plan for Utility Corridor Evaluation in March 2020. Ford updated EGLE of evaluation results throughout 2020 and 2021, including the subject analytical results discussed here.

EGLE, in consultation with Department of Health and Human Services (DHHS), has determined that information presented in the May 5, 2021 memo indicates there may be an immediate risk from volatilization of Chemicals of Concern (COC) into the indoor air via the sewer corridor along Plymouth Road. Pursuant to Section 6.6(d)(iii) of the CD, EGLE is requesting that Ford immediately undertake the Interim Response Activities (IRA) identified below in consultation with EGLE. As required by Section 6.6(d)(i), EGLE is requesting Ford conduct immediate actions to evaluate this immediate risk and submit an addendum to the ResAP which incorporates commitment to do the following:


1. Ford must fully characterize the extent of impacted sewer corridor stepping out in all locations where vapor concentrations exceed applicable criteria.
 - a. In addition to assessing north and south along Stark Road, this will require assessing if the Plymouth Road sewer continues east beyond Stark and following any laterals intercepting all corridors where concentrations are above criteria. This also includes any locations on the Ford property.
 - b. All lateral pipes must be evaluated including the point of entry into the structure. For example, the P-traps, floor drains and wax seals may need to be inspected and deemed in good working condition to prevent the direct volatilization of vapors into the structure. If the structure has a sump it should also be evaluated.
 - c. For all structures along the impacted corridors, Ford is required to document the laterals and where they connect or show evidence that laterals do not connect to impacted sewers.
2. For connected structures, Ford must perform a pathway evaluation for compliance.
 - a. It is encouraged that Ford examine if an exterior vapor trap is present and sample between the exterior trap and structure to evaluate compliance. If no exterior trap is present, Ford must determine if indoor plumbing is protective of vapor migration.

Mr. Todd M. Walton
Ford-Livonia Transmission Plant
Page 2
June 2, 2021

- i. In areas where neither can be shown, regular indoor air sampling is required until engineering controls can show the pathway is incomplete. If indoor air samples exceed criteria, Ford must immediately notify and consult with EGLE and DHHS for guidance.
- b. Within residential areas and residential-use structures the residential criteria will be used and the criteria should not use a 12-hour exception. The appropriate criteria should be documented for each structure.

Work should begin on the required work within 7-days of receipt of this letter with an addendum to the ResAP, or a workplan, incorporating the content above and progress to-date submitted to EGLE within 30-days of receipt. Subsequent to this, please update EGLE regarding progress in quarterly mitigation reports, or as necessary per Ford's evaluation. If you would like to meet with EGLE to discuss, please contact me.

Sincerely,



Brandon Alger, Geologist
Warren District Office
Remediation and Redevelopment Division
586-623-2839
AlgerB@Michigan.gov

cc: Mr. Chuck Pinter, Ford Motor Company
Mr. Kris Hinskey, Arcadis of Michigan, LLC
Ms. Alexandra Rafalski, DHHS
Mr. Aaron Cooch, DHHS
Mr. Paul Owens, EGLE
Ms. Beth Vens, EGLE
Mr. Joshua Scheels, EGLE
Ms. Cyndi Mollenhour, EGLE
Ms. Krista Reed, EGLE