



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 27, 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, Addendum 1
Received Date: May 12, 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), Addendum 1, received on May 12, 2021.

This addendum to the IGMP indicates that Ford will continue their ongoing obligation of quarterly groundwater sampling, which Ford has met since 2017, while updating the monitoring schedule for select wells. This update is based on results, trends, and hydrogeological analysis of all past samples. The IGMP Addendum is approved with modifications. These modifications are explained as follows:

- **Deep-aquifer monitoring wells – MW-15-59D, MW-15-60D, MW-15-61D** – EGLE approves a modification of these wells, but not as proposed in the Addendum. EGLE will require semi-annual sampling.
 - Because these are the only wells in the deeper aquifer and due to the historical nature of the plume, EGLE still requires semiannual sampling to verify that conditions within the deeper groundwater remain stable and that the deep aquifer is not impacted by the plume.
- **8 northwestern Ford property wells: MW-194, MW-194S, MW-195S, MW-196, MW-196S, MW-197S, MW-198, MW-198S** – Based on analysis in Attachment 1, EGLE partially concurs with the Arcadis assessment:
 - MW-195S, MW-196, MW-196S, and MW-197S require continued quarterly sampling due their variability, elevated concentrations, and lack of clear trend. This should continue until a longer trend can be established showing sustained trends and stability over a period of longer than 5 quarters.
 - MW-194, MW-194S, MW-198, and MW-198S have shown limited variability and sustained low levels. These wells are approved for semi-annual sampling as proposed in the addendum. Semi-annual sampling of these wells will continue to

achieve overall performance objectives required per the decree and Response Activity Plans.

- **9 northern boundary wells; MW-55, MW-55D, MW-56, MW-113, MW-114, MW-120, MW-122, MW-124, MW-199S** – Based on analysis in Attachment 1, EGLE concurs with the Arcadis assessment. The max/min and overall trends of these wells is consistent, indicating that semi-annual monitoring will achieve requirements of Section 6.1(c) and 6.7 of the Consent Decree and will continue to achieve overall performance objectives required per the decree and Response Activity Plans.
- **13 off-site commercial property wells: MW-125, MW-125S, MW-129, MW-129S, MW-186S, MW-187, MW-187S, MW-188S, MW-189, MW-189S, MW-190, MW-190S, MW-191S** – Based on analysis in Attachment 1, EGLE concurs with the Arcadis assessment. The analytical trends have been consistently low-level and below applicable criteria or non-detect. Annual sampling of these wells is adequate to achieve the requirements of Section 6.1(c) and 6.7 of the Consent Decree and will continue to achieve overall performance objectives required per the decree and Response Activity Plans.
- **TW-16-01 and TW-16-02** – Based on analysis in Attachment 2 and expanded reasoning within Addendum 1, EGLE concurs with the Arcadis proposal to end groundwater monitoring on the aquifer test wells.
- **TW-16-03 and TW-16-04** – Based on analysis in Attachment 2 and expanded reasoning within Addendum 1, EGLE concurs with the Arcadis proposal to end groundwater monitoring on the aquifer test wells.

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 need clarification on the addendum modifications, 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
Mr. Paul Owens, EGLE
Ms. Cyndi Mollenhour, EGLE
Ms. Beth Vens, EGLE
Mr. Josh Scheels, EGLE
Ms. Krista Reed, EGLE