



Environmental Quality Office
Sustainability, Environment & Safety
Engineering

Ford Motor Company
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Dearborn, MI 48126

November 19, 2021

Ms. Jeanne Schlaufman
Environmental Quality Specialist
Warren District Office
Remediation and Redevelopment Division
Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, Michigan 48092-2793
SCHLAUFMANJ1@michigan.gov
VIA E-MAIL

Ms. Schlaufman:

Thank you for your letter dated November 9, 2021, which was transmitted to Ford Motor Company ("Ford") the following day. With this letter, Ford seeks to (a) acknowledge receipt of your letter; (b) provide background regarding work Ford has conducted since 2019 relevant to the issues discussed in your letter; and (c) explain what work Ford has planned in the coming weeks.

Ford has been investigating certain utility corridors near its Livonia Transmission Plant ("LTP") since 2019 – consistent with the requirements of the Consent Decree and with regular and routine guidance from your predecessor, Brandon Alger. Ford's work has been science-driven and conducted transparently.

Key documents pertaining to Ford's utility corridor investigation, and the dates EGLE approved them, include the following:

- *Response Activity Plan – Utility Corridor Evaluation Revised*, submitted on February 11, 2020, and approved by EGLE on March 5, 2020.
- *Response Activity Plan Addendum*, submitted on December 4, 2020 and approved by EGLE on December 11, 2020.
- *Response Activity Plan Addendum #2*, submitted on January 27, 2021, and approved by EGLE on February 18, 2021.

A timeline recounting the substance of this work is attached to this letter as Exhibit A. Since Response Activity Plan Addendum #2 was approved, Ford's work has continued under EGLE supervision, with meetings conducted on essentially a bi-weekly basis since February 26th. During these meetings, Ford's work and overall approach has been developed with input from EGLE. Ford is preparing a packet of materials to supplement the administrative record to

reflect Ford's efforts and our ongoing engagement with EGLE under the Consent Decree, and specifically those related to the utility corridor investigation including EGLE's approval of those efforts. The materials will demonstrate Ford is in compliance with the Consent Decree.

Let me take an opportunity to address some of the concerns raised in your letter regarding the sewer system. Ford has conducted substantial work to address risks of contamination to the sewer system and has plans for additional work going forward. Ford has focused on removing the possibility that LTP-related contamination reaches the sewers at all. And, as of today, these efforts appear to be successful. This work has included rehabilitating 4,500 linear feet of pipe and nine manholes and installing new treatment systems. At the same time, Ford has worked to investigate and characterize potential downstream impacts in the sewershed even though Ford's on-site work has substantially decreased exceedances in the sewers (see Figures 1 and 2 in Exhibit A) and Ford consultants are returning to the field this month for additional data. To put as fine of a point as possible on one issue raised in your letter, the extent of sewer-related contamination should be known after the next round of planned sampling. Ford is planning future work depending on what the next round of sampling data shows and we will outline this work in detail in our formal response to your letter.

Before closing, Ford disputes those portions of your letter which imply that Ford has not acted appropriately in addressing issues addressed by the Livonia Consent Decree. Ford has been conducting work since 2015 to address LTP-related issues and – in the six years since – Ford has both complied with its obligations and worked to address any concerns raised by residents, the City of Livonia, or EGLE with appropriate urgency applying sound technical solutions.

Ford unequivocally denies that it has failed to comply with the Consent Decree, including throughout its work pursuant to the EGLE-approved utility corridor Response Activity Plans. Ford has complied and will continue to comply with the Consent Decree. And it will continue to work productively with EGLE pursuant to the Consent Decree's requirements. To that end, Ford will provide a comprehensive response within 30 days of your November 9 letter, as requested.

If you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd M. Walton". The signature is fluid and cursive, with the first name "Todd" being more prominent.

Todd M. Walton
Manager, Global Site Assessment & Remediation

Attached: Exhibit A – Arcadis Memo dated November 19, 2021 from Kris Hinskey, *Response to EGLE – Sewer Investigation and Impact to Utility Corridors – Vapor Mitigation - Livonia Transmission Plant (LTP)*

Jeanne Schlaufman, EGLE

November 19, 2021

Page 3

cc: Mr. Kris Hinskey, Arcadis
Mr. Aaron Cooch, DHHS
Ms. Alexandra Rafalski, DHHS
Ms. Cyndi Mollenhour, EGLE
Mr. Paul Owens, EGLE
Ms. Beth Vens EGLE
Mr. Matthew Williams, EGLE
Ms. Krista Reed, EGLE