



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 11, 2022

VIA E-MAIL

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

Dear Mr. Walton:

SUBJECT: Compliance with Consent Decree No. 2:21712372 -GAD-RSW (CD)
Sewer Investigation and Impact to Utility Corridors – Vapor Mitigation
Ford Livonia Transmission Plant (LTP)
36200 Plymouth Road, Livonia, Wayne County, Michigan
Site ID No.: 82002970

The Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division has reviewed the Memo dated November 19, 2021, and the Utility Corridor Evaluation Report, submitted by Ford Motor Company (Ford) dated December 9, 2021 (Report). According to these documents, prepared by Arcadis on behalf of Ford, they serve as Ford's response and satisfy the 30-day requirement to respond set forth in EGLE's November 9, 2021, letter to Ford.

EGLE's review of the Memo and Report find that Ford has not undertaken all of the response activities identified as necessary or provided the information requested by EGLE in letters dated June 2, 2021, and November 9, 2021, and thus Ford is not in compliance with the requirements of the Consent Decree No. 2:21712372 -GAD-RSW entered with EGLE on July 21, 2017 (CD). As stated in the EGLE letter dated November 9, 2021, if Ford fails to cure the violation of paragraph 6.1(b) of the CD within the 30-day time frame, stipulated penalties pursuant to paragraph 15.4 of the CD, would begin to accrue and continue to accrue through the final days of completion of the performance of the response activities or correction of the violation. EGLE has determined that Ford failed to correct the violation and as of February 7, 2022, stipulated penalties have accrued to the sum of \$84,000.00.

In the letters dated June 2, 2021, and November 9, 2021, EGLE directed Ford to **immediately** undertake certain response activities to identify and mitigate all unacceptable risks, pursuant to Section 6.6(d)(iii) of the CD and to provide certain information. As presented in the Report, Ford still has not undertaken the following response activities or provided the requested information:

- a. Identify the presence and extent of any laterals intercepting the length of the sewer corridors where concentrations are above the applicable site-specific criteria, including any locations on the Ford property.
- b. At structures along the sewer corridor where vapors are identified, and concentrations are above the applicable site-specific criteria, Ford was required to document the laterals and their connections and determine if each structure does or does not connect to the sewer or portions of the sewer.
- c. For each lateral and structure that is connected to the sewer corridors where vapor concentrations are above the applicable site-specific criteria, each lateral pipe must be evaluated for the presence of contaminated groundwater, sediment, and vapors, including the point of entry into the structure.
- d. At structures where it could not be demonstrated there was an exterior vapor trap preventing vapor migration or the indoor plumbing did not prevent the migration of vapors into the indoor air, Ford was to immediately conduct sampling of the indoor air.

The December 14, 2021, vapor samples collected from the sanitary sewer still indicate the presence of vapors (SAMH-1231, SL-2, and SL-3) at concentrations above the applicable residential and nonresidential site-specific criteria for vapor in a preferential pathway. According to the Memo and the Report, Arcadis identified and confirmed 40 lateral pipes on the Ford property and 44 lateral pipes off-property between manholes SL-2 and SL-5. EGLE requested that Ford, in the letters dated June 2, 2021, and November 9, 2021, for each lateral pipe and structure that is connected to the sewer corridors where vapor concentrations are above the applicable site-specific criteria, be evaluated for the presence of contaminated groundwater, sediment, and vapors, including the point of entry into the structure. The Report does not include a figure that identifies the locations of any of the 40 on-property or 44 off-property lateral pipes.

The Report also does not indicate that Ford identified any of the laterals within or adjacent to the residential area or homes, requested access, or has done any investigation to determine whether vapors were or had the potential to migrate into the residential structures. Ford requested access to only seven (7) commercial properties of which only three (3) granted access. EGLE reviewed Section 3.3 – (Commercial Property Inspections) of the Report and finds the inspection and or the information provided regarding the following inspections to be insufficient:

- **34850 Plymouth Road**
 - The inspection was to confirm that each of the identified p-traps was wetted as described and was functioning, as required. The Report does not indicate this was confirmed by the inspection conducted.
 - The absence of odors at the floor drain does not constitute an adequate inspection of the drain, the identified contaminants of

concern are not likely to be present above their odor threshold. The floor drain must be investigated further to confirm that a p-trap is present and to confirm it is functioning properly or Ford must conduct an evaluation of the indoor air.

- The toilets were not inspected as indicated in EGLE letters dated June 2, and November 9, 2021. If access was not granted and could not be secured to inspect the wax ring(s) to determine it was functional, an evaluation of the indoor air should have been conducted.
- The Report also indicates that no roof vent was identified. It is not understood why, as part of the inspection, it was not determined where or how the sewer lines vent to assure the sewer is venting to the outside.

- **34900 Plymouth Road**

- The inspection was to confirm that each of the identified p-traps was wetted as described and was functioning, as required. The Report does not indicate this was confirmed by the inspection conducted.
- The absence of odors at the floor drain does not constitute an adequate inspection of the drain, the identified contaminants of concern are not likely to be present above their odor threshold. The floor drain must be investigated further to confirm that a p-trap is present and to confirm it is functioning properly or Ford must conduct an evaluation of the indoor air.
- The toilets were not inspected as indicated in EGLE letters dated June 2, and November 9, 2021. If access was not granted and could not be secured to inspect the wax ring(s) to determine it was functional, an evaluation of the indoor air should have been conducted.

- **35000 Plymouth Road**

- The inspection was to confirm that each of the identified p-traps was wetted as described and was functioning, as required. The Report does not indicate this was confirmed by the inspection conducted.
- The absence of odors at the floor drains or trench drains does not constitute an adequate inspection of the drains and trench drains, the identified contaminants of concern are not likely to be present above their odor threshold. The floor drain must be investigated further to confirm that a p-trap is present and to confirm it is functioning properly or Ford must conduct an evaluation of the indoor air.
- The toilets were not inspected as indicated in EGLE letters dated June 2, and November 9, 2021. If access was not granted and could not be secured to inspect the wax ring(s) to determine it was functional, an evaluation of the indoor air should have been conducted.

In addition, EGLE identified the following deficiencies in the Report that must be addressed.

- Appendix A – Onsite and Offsite Recon and Sampling Log.
Provide a Figure that corresponds to the logs and identifies each of the manholes or drains.
- Figures 1 and 2 included in the report depict many of the manholes and catch basins identified on the logs, but they do not include most of the manholes at the LTP property inside or outside of the plant such as: Manhole 1, 2, 1A, 1B, 3A, 3B, etc. or any of the floor drains, or vaults, etc. There should a figure that identifies all on-site manholes, vaults, floor drains, etc. that were inspected as identified in Appendix A – even if only to show the location of the restroom where a drain is located.
- There are photos of a manhole identified as being at the intersection of Plymouth and Levan, the manhole should be depicted on Figure 1, as should SAMH-1228, SAMH-1088 and 1067, STMH 1001, 1041, 1088, and 1210.
- Depict on Figures the sewer lines that DO NOT connect in a different color.
- Section VII. Access – 7.2 requires Ford to provide copies of the secured access agreements to EGLE. Section 3.3 of the Report states that access agreements were secured for 3 commercial properties (34850, 34900, and 35000) Plymouth Road. Copies of the secured access agreements are not included in or were otherwise provided to EGLE.

During the January 4, 2022, meeting between EGLE and Ford, EGLE advised Ford they need to undertake the response activities necessary to determine the source of the contamination (groundwater and or vapors) that are entering the sewer and evaluate the concentration; it was acknowledged that the trend based on the current data seems to indicate the presence of contamination in the sewers has decreased in concentration and appears no longer to be continuous. EGLE indicated that the collection of vapor samples from within the sewers needed to occur on a more frequent basis (weekly was proposed by Ford, but not agreed to by EGLE) and would need to continue for a period of time period not yet determined. EGLE requested that Ford (Arcadis) develop and provide to EGLE a scope of work (SOW) to determine the source of the contamination and to continue to collect vapor data at an interval that will capture the variation in presence and concentrations within the sewers as suggested by the most recent sampling data. The information and SOW provided to EGLE from Arcadis via email dated January 18, 2022, was not responsive; see email from EGLE dated January 28, 2022, to Arcadis (Ford).

EGLE does not discount the challenges identified by Ford in securing access to commercial businesses and residential homes to be able to conduct the response activities necessary to determine that intrusion is not occurring or that there is not the potential for vapors present within the sewers connected to a structure to migrate into the indoor air at unacceptable concentrations. EGLE also acknowledges the work Ford

Mr. Todd Walton
Ford Motor Company (LTP)
Page-5
February 11, 2022

conducted to inspect, clean, line, seal, etc. the sanitary sewer lines on the Ford- Livonia Transmission Plant property or the investigations (CCTV and cleaning) conducted by Ford of the off-site sanitary sewer lines along Plymouth and Stark Roads. However, from at least 2020 Ford has been aware of the presence of vapors within the sewers due to the volatilization of the contaminants of concern (COCs) from both groundwater and likely sediments that exist within and are migrating into the sewers at concentrations that could pose an unacceptable risk if they migrate into the indoor air. These potential risks still exist today because Ford has not completed the necessary response activities to identify and mitigate all unacceptable risks.

Within 21 days receipt of this letter, Ford shall provide to EGLE the information that EGLE has requested since at least June of 2021, and a SOW with clearly stated objectives and time frames for the completion of the objectives. The SOW must be responsive to the January 4, 2022, discussion between EGLE and Ford and EGLE's January 28, 2022, email to Arcadis (Ford). If Ford fails to submit the requested information and the comprehensive SOW within 21 days of receipt of this letter, EGLE may assess the stipulated penalties that have accrued through February 7, 2022.

If you have any questions regarding this matter, please do not hesitate to contact Ms. Jeanne Schlaufman, Project Manager, SchlaufmanJ1@Michigan.gov.

Sincerely,



Paul Owens, District Supervisor
Warren District Office
Remediation and Redevelopment Division
OwensP@Michigan.gov

cc: Mr. Chuck Pinter, Ford Motor Company
Mr. Kris Hinskey, Arcadis of Michigan, LLC
Mr. Matthew Williams, EGLE
Ms. Cyndi Mollenhour, EGLE
Ms. Beth Vens, EGLE
Ms. Jeanne Schlaufman, EGLE
Ms. Krista Reed, EGLE