



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

April 13, 2022

CERTIFIED MAIL – 7020 2450 0000 0100 7549

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

Dear Todd Walton:

SUBJECT: Compliance with Consent Decree No. 2:21712372 -GAD-RSW (CD)
Utility Corridors Assessment Response (March 4, 2022)
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 memorandum and scope of work received March 7, 2022, titled Livonia Transmission Plant Utility Corridor Assessment – Response to EGLE Letter Dated February 11, 2022, and Scope of Work for offsite Utility Corridor Assessment, submitted by Ford Motor Company (Ford) dated March 4, 2022 (Report). According to the Report, prepared by Arcadis on behalf of Ford, it serves as Ford's response and satisfy the 21-day requirement to respond as set forth in EGLE's February 11, 2022, letter to Ford.

EGLE's review of the Report finds that Ford has not undertaken all the necessary response activities or provided the information EGLE requested in letters dated June 2, 2021, November 9, 2021, and February 11, 2022, to demonstrate compliance with the Consent Decree No. 2:21712372 -GAD-RSW entered with EGLE on July 21, 2017 (CD). Ford has known since the June 2, 2021, letter that the analytical results from the May 5, 2021, Utility Corridor Analytical Results memorandum that a potential for an immediate health risk from volatilization of Chemical of Concerns into indoor air via the sewer corridor along Plymouth Road exists. Paragraph 6.1(b) of the CD, states in part, that Ford shall perform interim response activities to identify and address conditions that require response activities necessary to mitigate any immediate public health risk. Because Ford has not identified and addressed all the conditions associated with the COCS in the Utility Corridor, immediate health risks potentially still exist and therefore Ford is not in compliance with Paragraph 6.1(b).

Per the EGLE February 11, 2022, letter, Ford was to provide to EGLE the information indicated in the following items:

- a. Identifying 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 is 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.

EGLE has requested this information be provided since June 2, 2021. Ford's response as indicated in the Report was to provide a "...detailed scope of work...to satisfy EGLE's comments for a, b, and d." In the February 11, 2022, letter EGLE did not request a scope of work for these items and a scope of work does not satisfy EGLE's request with respect to items a, b, c, and d. Proposing to undertake the activities necessary to acquire the required information does not demonstrate that Ford is in compliance or has complied with previous EGLE requests.

With respect to the Report and item c EGLE has the following comments:

- Ford should provide still photos from the video of the sanitary sewer to confirm the connection of the laterals at the top of the main sanitary sewer pipe.
- Ford should provide cross-sections that show the groundwater is not in contact with the sanitary sewer.

EGLE's February 11, 2022, letter did request that Ford provide a scope of work to determine the source of the contamination entering the sanitary sewer and to continue to collect vapor data at an interval that will capture the variation and presence and concentrations within the sanitary sewer. Ford's response as presented in the Report (page 11) is not a scope or work. The response provided by Ford through Arcadis is that they have been conducting an "adaptive investigation" to screen the sanitary manholes on Ford's property. The Report does not provide any details with respect to the screening of the manholes. There is no analysis of the data collected to date to indicate how or why the interval at which the manholes are being screened is or will capture the variation in the presence and concentrations of contamination within the sewers, or what the data collected to date indicates with respect to the source of the

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contamination. The Report does not identify any other measures that Ford is taking or is proposing to take to meet the objectives of the scope of work requested by EGLE.

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. As of the date of this letter, stipulated penalties are continuing to accrue.

EGLE is requesting Ford submit a response activity plan for interim response activities (ResAP IRA) that identifies and addresses all conditions that require response activities necessary to mitigate any immediate public health risk regarding the Utility Corridor. EGLE's expectation is that the ResAP IRA should be responsive to the January 4, 2022, discussion between EGLE and Ford, EGLE's January 28, 2022, email to Arcadis (Ford) and EGLE's February 11, 2022, letter. Please submit the ResAP IRA within 30 days of receipt of this letter.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Paul Owens, District Supervisor
Warren District Office
Remediation and Redevelopment Division
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cc: Chuck Pinter, Ford Motor Company
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