



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 1, 2022

DELIVERED VIA EMAIL

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

Dear Todd Walton:

SUBJECT: Re: Work Plan for Design Validation Injection Testing
(Aka In-Situ Injection)
Date of Work Plan: June 22, 2022
Date Received: June 27, 2022
Ford - Livonia Transmission Plant (Ford - LTP)
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 (RRD) has reviewed the "Work Plan for Design Validation Injection Testing" (aka In-Situ Injection) submitted by Arcadis of Michigan and received by EGLE on June 27, 2022.

The Work Plan (WP) proposes to inject a known volume and concentration of fluorescein dye into the groundwater at the Ford - LTP. The dye will be injected (injection phase) into a monitoring well (to be installed) located within the test track and allowed to migrate (drift phase) with ambient groundwater flow. The dye is to be injected for the purpose of gathering data to determine site-specific parameters that are required for the design of a full-scale injection-based system for the remediation of volatile organic compounds in groundwater at the LTP.

The direct or indirect introduction of any substance into groundwater that meets the definition of a discharge for the purpose of an *in-situ* remediation is required to be authorized by a groundwater discharge permit or an appropriate permit exemption under the Part 22 Groundwater Administrative Rules (Part 22 Rules) promulgated pursuant to Part 31, Water Resources Protection of the Natural Resource and Environmental Protection Act, Act 451 of 1994, as amended. The pilot study as identified in the WP is subject to approval pursuant to Rule 2210(u)(iii) and prior approval from the RRD is necessary before the discharge can be lawfully implemented.

Based on the RRD review of the WP, the WP is approved with the following conditions or modifications:

- Confirm depth of the utilities to the North of the injection point.
- In addition to PWM-1, add a couple of down gradient wells (can be temporary wells) to track dye over the 12 weeks. This may provide additional data that will be useful in planning the full-scale design.
- Define localized groundwater flow. If any southeast flow component is present, adjust monitoring well(s) accordingly.
- Dye has a similar appearance to hexavalent chrome. Due to site history, if injected dye has the potential to move off-site or viewed publicly, Ford Motor Company may want to have a public notice for the municipality, local residence, and/or the wastewater treatment plant.
- Provide any changes to workplans or figures as needed to the RRD Project Manager prior to the implementation of the WP.

This letter provides the necessary written notification from the RRD that the WP is approved with conditions and the requisite authorization pursuant to Rule 2210(u)(iii) of the Part 22 Rules to allow Ford Motor Company to proceed with implementation of the in-situ injection of fluorescein dye.

If you have any questions or concerns, please contact Jeanne Schlaufman, Project Manager at SchlaufmanJ1@Michigan.gov, or me at the email or phone number below.

Sincerely,



Paul Owens, District Supervisor
Detroit District Office
Remediation and Redevelopment Division
586-235-6990
OwensP@Michigan.gov

cc: Chuck Pinter, Ford Motor Company
Kris Hinskey, Arcadis of Michigan, LLC
Cyndi Mollenhour, EGLE
Beth Vens, EGLE
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