



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



AARON B. KEATLEY
ACTING DIRECTOR

June 8, 2023

VIA EMAIL AND CERTIFIED MAIL – 7021 2720 0000 5783 4187
RETURN RECEIPT REQUESTED

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

Dear Todd Walton:

SUBJECT: Utility Corridor Evaluation Report – Disapproval, and Status of Ongoing Dispute; Ford – Livonia Transmission Plant; 36200 Plymouth Road, Livonia, Wayne County, Michigan (Site); Consent Decree No 2:1712372-GAD-RSW; Site ID No.: 82002970

This letter serves as the Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division's (RRD) response to Ford's request to review the report identified as "Utility Corridor Evaluation Report" (Report), dated October 28, 2022, submitted by Arcadis of Michigan, LLC (Arcadis), on behalf of Ford and received by EGLE on November 1, 2022.

It is EGLE's understanding that the Report is a Remedial Investigation (RI) Report for the Off-Site Utility Corridor, submitted by Ford as a component of the RI Report required under Section 6.7 of the Consent Decree No. 2:1712372-GAD-RSW (CD). It is EGLE's further understanding that the Report is not intended to be a complete RI for the Area of Concern identified in the CD, but limited to documenting the investigation, evaluation, and interim measures that have been conducted as of October 14, 2022, to address site-specific contaminants of concern (COCs) to the sanitary sewer system on Site and downgradient of the Site, as described in the Report's Executive Summary. EGLE reminds Ford to please identify future submittals using terminology of the CD and reference the section of the CD that the document is being submitted pursuant to. If EGLE's understanding is incorrect concerning the purpose of the Report as it relates to the CD as described above, please let me know.

Within the text of the Report, Ford requested EGLE conduct a formal review of the Report and to provide review and comment or approval of the "next steps" Ford proposes to undertake as listed in the Report under Section 5 – Conclusions. Because the Report is considered a Submission under Section XIII (Submissions and Approvals) of the CD, Pursuant to Paragraph 13.2 of the CD, this letter serves as EGLE's disapproval of the Submission.

Detailed below are the response activities EGLE has determined Ford must implement for Ford to demonstrate it has complied with Paragraph 6.1(b) of the CD.

a) Sanitary Sewer Vapor Extraction System Operation and Effectiveness:

- i. Confirm and provide the documentation that demonstrates the sanitary sewer vapor extraction (SSVE) system has run continuously (no downtime has been reported) since the last time the vapor samples were collected (October 3, or 4, 2022) from the sanitary sewer manholes on Stark Road and Hathaway Street.
- ii. Continue to sample sanitary sewer manholes SAMH-1231 and SL-2 per the approved SSVE response activity plan – interim response and include the collection of vapor samples from SL-3 for laboratory analysis of the COCs on the same frequency.
- iii. The operation of the SSVE and sampling shall continue until it can be demonstrated that the concentrations in vapor at the Livonia Transmission Plant in any portion of the sanitary sewer prior to the manhole at which the SSVE system is located are below and will remain consistently below the applicable residential site-specific volatilization to indoor air criteria (SSVIAC) in vapor for all COCs.
- iv. If the SSVE system fails to operate or concentrations are identified in the sanitary sewer beyond the system above the applicable residential SSVIAC for vapor, then additional response activities may be warranted.

b) Stark Road:

- i. Collect vapor samples on a monthly basis from manholes SL-5, SL-8 through SL-12, SL-22, SL-23, SL-26, SL-27, and SL-29 until the sample results for all COCs in every sample are non-detect or below the residential SSVIAC for three consecutive monthly sampling events.
- ii. Upon receipt of the vapor data for samples collected from the manholes identified above, at any lateral and/or structure located or connected to the sanitary sewer within the area where the detected concentrations in vapor are above the residential SSVIAC for vapor for two consecutive months, Ford is to immediately undertake one or all of the following response activities:
 - Determine the presence of an external lateral that can be examined and determined to not allow the movement of vapors into the structure, unless previously inspected and documented.
 - For any external lateral present within the area of an exceedance of the residential SSVIAC for vapor, Ford should immediately, within 1-2 days of, seek access to the structure to conduct an inspection of the plumbing, drains, traps, etc., within the structure, unless previously inspected and documented. Ford shall immediately conduct all repairs as necessary.

- If within 15 days of Arcadis' receipt of the data, access has not been obtained and the structure has not been inspected, Ford shall initiate the cleaning of the sanitary sewer starting at the most upgradient manhole in the sampling program on Stark Road.
 - The collection of vapor samples at the affected manholes should continue starting two weeks after having conducted the cleaning, allowing for a return to "normal" conditions within the sanitary sewer.
 - Conduct indoor air sampling, if the above inspections indicate vapors have the potential to enter the structure.
- iii. Ford shall not remove any of the manholes identified above from the sampling program on Stark Road unless all prior upgradient manholes have been demonstrated to be below the residential SSVIAC for vapor and EGLE concurs continued sampling is not necessary.

c) Hathaway Road

- i. Ford shall collect samples for laboratory analysis of all COCs from the manholes located on Hathaway Street identified as SL-20, SL-21, SL-30 through SL-35, SL-35A and SL-35B weekly until the sample results for all COCs in every sample are non-detect or below the residential SSVIAC for vapor for four consecutive weekly sampling events. Samples shall then be collected from these manholes monthly until the sample results for all COCs in every sample are non-detect or below the residential SSVIAC for vapor for three consecutive monthly sampling events.
- ii. Upon receipt of the vapor data for samples collected from the manholes identified above, at any lateral and or structure located or connected to the sanitary sewer within the area where the detected concentrations in vapor are above the residential SSVIAC for vapor for two consecutive months, Ford is to immediately undertake one or all of the following response activities:
- Determine the presence of an external lateral that can be examined and determined to not allow the movement of vapors into the structure, unless previously inspected and documented.
 - For any external lateral present within the area of an exceedance of the residential SSVIAC for vapor, Ford should immediately within 1-2 days of Arcadis' receipt of the data seek access to the structure to conduct an inspection of the plumbing, drains, traps, etc., within the structure, unless previously inspected and documented. Ford shall immediately conduct all repairs as necessary.
 - Within 15 days of Arcadis' receipt of the data, if access has not been obtained and the structure has not been inspected, Ford shall initiate the cleaning of the sanitary sewer starting at the most upgradient manhole in the sampling program on Hathaway Road.
 - The collection of vapor samples at the affected manholes should continue starting two weeks after having conducted the cleaning, allowing for a return to "normal" conditions within the sanitary sewer.

- Conduct indoor air sampling, if the above inspections indicate vapors have the potential to enter the structure.
- iii. Ford shall not remove any of the manholes identified above from the sampling program on Hathaway Street unless all prior upgradient manholes have been demonstrated to be below the residential SSVIAC for vapor and EGLE concurs continued sampling is not necessary.

d) Farmington Road

- i. Upon receipt of data indicating exceedances of the SSVIAC for vapor collected from SL-35, SL-35A, or SL-35B; Ford shall continue to sample manholes on Farmington Road to define the extent of vapors within the sanitary sewer system.
- ii. Defining the extent of vapors within the sanitary sewer must continue until either the concentrations of COCs are below the residential SSVIAC for vapor on a consistent basis or Ford is able to make a demonstration through sampling that any potential contribution by Ford is insignificant in comparison to upgradient or other source contributions.
- iii. Failure to make a demonstration that vapors present in the sewer downgradient of SL-35B are not contributable to another source will require that Ford continue to implement necessary response activities to include the inspection, repair, and monitoring program for structures located along Farmington Road similar to what is identified in b) and c) above.
- iv. Ford shall complete the definition of the downgradient extent of vapor in the sanitary sewer within six months of identifying the presence of vapors above the residential SSVIAC.

The response activities described in Paragraphs (a), (b), (c), and (d) above shall be implemented within 15 days of receipt of this letter. Once completed, Ford shall provide written notice to me pursuant to Section 12.3 of the CD.

EGLE recognizes that Ford has invoked an ongoing dispute pursuant to Section 16.3 of the CD. The dispute pertains to EGLE's assertion that Ford has not complied with Section 6.1(b) of the CD. Ford's timely implementation of the response activities described above will provide a basis for the parties to begin discussions that EGLE hopes will resolve the dispute. EGLE received Ford's Request for Review of the dispute on May 12, 2023. In a phone call with you on May 18, 2023, we verbally agreed to extend the date for EGLE to provide its Statement of Decision by 30 days from the original due date of June 1, 2023, to July 1, 2023. If EGLE's understanding or characterization of this agreement is incorrect, please let me know immediately. EGLE may seek Ford's approval for additional extensions to the deadline for the Statement of Decision as necessary to continue evaluating Ford's implementation of the response activities detailed above.

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The following response activities may be undertaken by Ford at its discretion. However, if conducted these response activities should be done concurrent with the response activities identified above; the response activities identified above shall not be delayed for any reason.

- Identify and propose alternate approaches and demonstrations for the investigation of vapor in the sanitary sewer and connections.
- Develop SSVIAC for the evaluation of vapor in a sewer system in accordance with Section 20120b of Part 201.

In addition to notifying me when the identified response activities are complete, Ford should also notify Jeanne Schlaufman, Project Manager, Warren District Office, RRD, EGLE, 27700 Donald Court; at 586-753-3823 or SchlaufmanJ1@Michigan.gov when Ford begins to conduct the identified response activities.

If you have any questions, you may contact me.

Sincerely,



Mike Neller, Director
Remediation and Redevelopment Division
Michigan Department of Environment, Great
Lakes, and Energy
NellerM@Michigan.gov
517-512-5859

cc: Chuck Pinter, Ford Motor Company
Kris Hinskey, Arcadis of Michigan, LLC
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Joshua Mosher, EGLE
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