

**SUBJECT**

Utility Corridor Assessment –  
Response to EGLE Letter Dated June 8, 2023  
36200 Plymouth Road, Livonia, Wayne County  
Consent Decree No 2:1712372-GAD-RSW (CJ)  
Site ID No.: 82002970

**TO**

Mr. Mike Neller, EGLE  
Ms. Jeanne Schlaufman, EGLE

**DATE**

June 21, 2023

**OUR REF**

30144174

**COPIES TO**

Mr. Todd Walton, Ford  
Mr. Chuck Pinter, Ford

**NAME**

Kris Hinskey – Arcadis of Michigan, LLC

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On behalf of Ford Motor Company (Ford), this memorandum (memo) has been prepared by Arcadis of Michigan, LLC (Arcadis) for the Livonia Transmission Plant (LTP) site (the site). This memo provides a response to the June 8, 2023 letter from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). Below details the response to EGLE's comments.

## Responses to EGLE Comments

The section below details the responses to EGLE's comments. Text in *italics* are quoted from the EGLE June 8, 2023 letter and are followed by responses that provide context and clarifications for future response activities that will be performed by Ford.

**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.*

**Response:** The SSVE system has run continuously except for downtimes that are detailed below:

- From October 25, 2022 to November 3, 2022, the SSVE system was not operating due to a battery malfunction within the generator. The system had an estimated downtime of 221 hours. Modifications to the system telemetry were completed so that shut down alarms could be assessed more quickly for future shutdowns;
- On November 17, 2022, the SSVE system shut off due to the generator malfunctioning from a fuel filter issue. The SSVE system was restarted the same day and ran intermittently until the generator was serviced on November 18, 2022 with a total downtime of 17 hours;
- On December 13, 2022, the SSVE system was shut down for 2.9 hours by Arcadis to exchange the two SSVE system media vessels as part of a routine media changeout;
- On December 29, 2022, the SSVE system shut off due to low oil pressure in the generator and re-started after 13.4 hours of downtime;

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Michigan Department of Environment, Great Lakes, and Energy  
June 21, 2023

- On March 16, 2023, the SSVE system shut off due to a power loss from the generator. The generator was serviced, and the SSVE system was turned back on March 17, 2023 with a total downtime of 17.3 hours; and
- On March 27, 2023, the SSVE system shut off due to a power loss from the generator. The generator was serviced on March 28, 2023 and the SSVE system was re-started after a total downtime of 12 hours.

The SSVE system downtime has been provided to EGLE in the Utility Corridor Assessment – Update Monthly Update for the Utility Corridor SSVE Response Activity Plan for Interim Response Activities memos since the system began operation. Ford will continue to provide SSVE system downtimes in the Utility Corridor Assessment – Monthly Update for the Utility Corridor SSVE Response Activity Plan for Interim Response Activities memos.

- 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.*

**Response:** Beginning in June 2023, monthly compliance samples for the SSVE system will include the sampling of compliance sample locations SAMH-1231, SL-2, and SL-3 as stated in the above comment. Ford will plan to include the results of the monthly samples collected at each of these locations in the Utility Corridor Assessment – Monthly Update for the Utility Corridor SSVE Response Activity Plan for Interim Response Activities memos to be submitted to EGLE monthly.

- 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.*

**Response:** Ford will continue to operate the SSVE system and complete compliance sampling as noted above while the onsite sanitary sewer system is being evaluated for the presence of site-related constituents of concern (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.*

**Response:** Ford will work collaboratively with EGLE if additional response activities are warranted in the future.

**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.*

**Response:** Ford will complete the vapor sampling as detailed above and a timeline/schedule has been provided in the memo detailing when vapor sampling will occur.

Sanitary sewer sample location SL-5 is located within a left turn lane going south on Stark Road to east on Plymouth Road and therefore requires traffic control and the closure of the left turn lane to sample. Ford will implement the traffic control and lane closure and sample SL-5 during the first monthly sampling event. However, Ford proposes sampling SL-4 instead of SL-5 in future monthly sampling events to avoid traffic hazards for field

staff, implementation of significant traffic control, and two-lane closures during each sampling event. In the event concentrations from vapor samples collected at sanitary sewer sample locations SL-4 or SL-8 exceed the residential SSVIAC at the frequency listed below (for two consecutive monthly sampling events), Ford will immediately undertake one or all of the response activities identified below in ii.

- 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.*

**Response:** Ford will follow the response activities outlined above, subject to the clarifications (1, 2, and 3) detailed below, if vapor concentrations exceed the residential SSVIAC in vapor samples collected from sanitary sewer manhole sample locations SL-5 (to be replaced with SL-4 pending EGLE approval), SL-8 through SL-12, SL-22, SL-23, SL-26, SL-27, and SL-29.

#### **Clarifications**

- 1) Ford is requesting clarification to the following EGLE comment and assumes the following, which is provided in the bolded text:  
*"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."*
- 2) Please provide guidance if a vapor exceedance is identified two weeks after the cleaning of the section of sanitary sewer pipe and associated manholes. Currently no guidance is provided if exceedances of site-related COC are identified two weeks after the sanitary sewer cleaning.

- 3) Indoor air sampling will not be conducted until a plumbing inspection has been completed and plumbing issues have been identified that are beyond repair.

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.*

**Response:** Ford will follow the response activities outlined above, subject to the clarifications detailed in 1, 2, and 3 listed above, if vapor concentrations exceed the residential SSVIAC in vapor samples collected from sanitary sewer manhole sample locations SL-20, SL-21, SL-30 through SL-35, SL-35A, and SL-35B.

**Clarifications** - Ford is requesting clarification on the following statement:

- 4) According to the June 8, 2023 letter, EGLE requests weekly vapor sampling events that would transition to monthly sampling events if all vapor sample results for all site-related COCs in samples collected at each sample location identified above are non-detect or below the residential SSVIAC for four consecutive weekly sampling events. EGLE's letter states that response activities are only warranted if vapor concentrations are above the residential SSVIAC for two consecutive months. Ford is requesting

clarification on how many weekly vapor sampling events that exceed the residential SSVIAC would warrant the response activities detailed above.

**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.*

**Response:** Ford will follow the response activities identified above if vapor concentrations exceed the residential SSVIAC in vapor samples collected at the manhole locations listed above.

**Clarifications** – Ford is requesting clarification on the following statements:

- 5) The sampling frequency (weekly, monthly, etc.) for the collection of vapor samples from locations along Farmington Road will be consistent with the sampling frequency defined for Hathaway Avenue;
- 6) The number of consecutive weekly and/or monthly vapor sampling events that indicate concentrations above the residential SSVIAC that would warrant the same response activities as defined for Hathaway Avenue;
- 7) Please define the frequency for “consistent basis”.
- 8) Please provide the reporting or notification mechanism to EGLE if Ford demonstrates that a potential source upstream of Hathaway Avenue or Farmington Road may be contributing to the vapor concentrations previously identified on Hathaway Avenue or at the intersection of Hathaway Avenue and Farmington Road (i.e., SL-35B); and
- 9) There appears to be a typo in the second bulleted response activity. Please confirm the correction below:
  - a. “Failure to make a demonstration that vapors present in the sewer downgradient of SL-35B are ~~not~~ contributable to another source...”

*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.*

**Response:** Ford/Arcadis have begun implementing the response activities described in Paragraphs (a), (b), (c), and (d) of the June 8, 2023 letter. Below details the timeline and schedule since receiving the letter;:

- Thursday, June 8, 2023
  - Traffic control specifications were provided to the traffic control contractor to coordinate support for Stark and Farmington Roads.

- Arcadis field staff (which completed the sampling events previously) were scheduled for upcoming monthly vapor sampling along Stark Road, weekly vapor sampling along Hathaway Avenue, and vapor sampling along Farmington Road north of Hathaway Avenue.
- Friday, June 9, 2023 – The laboratory that has been utilized to analyze the previous vapor samples collected within the offsite sanitary sewer was contacted to schedule rental/shipping of certified canisters for vapor sampling.
- Monday, June 12, 2023 and Tuesday June 13, 2023 – Contracts were drafted and provided to the laboratory for the certified canister rental order and the sampling schedule was confirmed with the laboratory.
- Tuesday, June 13, 2023 - The Michigan Department of Transportation (MDOT) was contacted regarding sampling in the roadway at SL-5 and to determine what permits may be required.
- Thursday, June 15, 2023 –
  - The City of Livonia was contacted regarding the upcoming vapor sampling schedule and scope of work. The City of Livonia confirmed that Arcadis can work underneath the City of Livonia’s annual MDOT permit. Therefore, no MDOT permit would be required.
  - Compliance vapor samples associated with the SSVE system were collected from compliance sample locations SAMH-1231, SL-2, and SL-3.
  - Wayne County was contacted regarding collecting vapor samples from locations along Farmington Road to confirm if any right of entry permitting is required.
  - Reconnaissance and visual inspection of sanitary sewer manholes located at the intersection of Plymouth Road and Farmington Road and along Farmington Road was completed. The reconnaissance and visual inspection was completed to determine connectivity across Plymouth Road and accessibility of manholes for sampling.
- Friday, June 16, 2023 – Arcadis provided the City of Livonia the traffic control plan for the intersection of Plymouth Road and Stark Road for the MDOT notification.
- Friday, June 16, 2023 through Tuesday, June 19, 2023 – Access agreements were drafted for any properties along Stark Road and Hathaway Avenue where access was not previously pursued.
- Tuesday, June 20, 2023 –
  - Freedom of Information Act (FOIA) requests were submitted for three properties located downgradient from the Site including 33111 Plymouth Road, 33405 Plymouth Road, and 10970 Farmington Road. The information obtained from these FOIA requests will be reviewed to determine the potential for other sources to contribute to vapor concentrations in the sanitary sewer system.
  - Wayne County was contacted regarding collecting vapor samples from locations along Farmington Road to confirm any permitting requirements.
- Wednesday, June 21, 2023 –
  - In an effort to expedite acquiring access to homes to complete plumbing inspections, if warranted, Ford is proactively mailing seventy-seven (77) access agreements to the residents who previously have not had plumbing inspections completed on Stark Road or Hathaway Avenue. **Figure 1**, provides the current status of offsite access agreements.
  - Additional reconnaissance and dye testing was completed at the manholes located at the intersection of Plymouth Road and Farmington Road to determine connectivity.
- Thursday, June 22, 2023 -
  - The seventy-seven (77) access agreements are scheduled to be delivered to the residential properties along Stark Road and Hathaway Avenue where previous access agreements had not been signed or access was not previously pursued.
  - Thursday, June 22, 2023 through Friday, June 23, 2023 – Vapor samples will be collected from manholes SL-5, SL-8 through SL-12, SL-22, SL-23, SL-26, SL-27, and SL-29 on Stark Road and manholes SL-20, SL-21, SL-30 through SL-35, SL-35A, and SL-35B along Hathaway Avenue.

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One (1) vapor sample will be collected from each of three (3) manhole locations identified on Farmington Road (SL-37, SL-38, and SL-39) north of Hathaway Avenue. Exact sample locations will be determined in the field post reconnaissance scheduled for June 21, 2023. All vapor samples will be shipped to the laboratory on Friday, June 23, 2023. The laboratory data turnaround time is between 3 to 5 business days.

*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.*

*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.*

**Response:** Ford and Arcadis are currently evaluating alternative approaches.

- *Develop SSVIAC for the evaluation of vapor in a sewer system in accordance with Section 20120b of Part 201.*

**Response:** Ford and Arcadis are currently evaluating the potential for new SSVIAC.

*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.*

**Response:** This memo satisfies EGLE's request for notification of the beginning of identified response activities. Ford continues to work diligently and collaboratively with EGLE to address the response activities outlined in the June 8, 2023 letter and is committed to completing the activities outlined in this memo.

Enclosures:

Figure 1 – Residential Access Agreement

# Figure 1

This document is a DRAFT document that has not received approval from EGLE. This document was prepared pursuant to a court Consent Decree. The opinions, findings, and conclusions expressed are those of the authors and not those of EGLE.



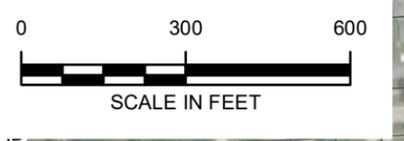
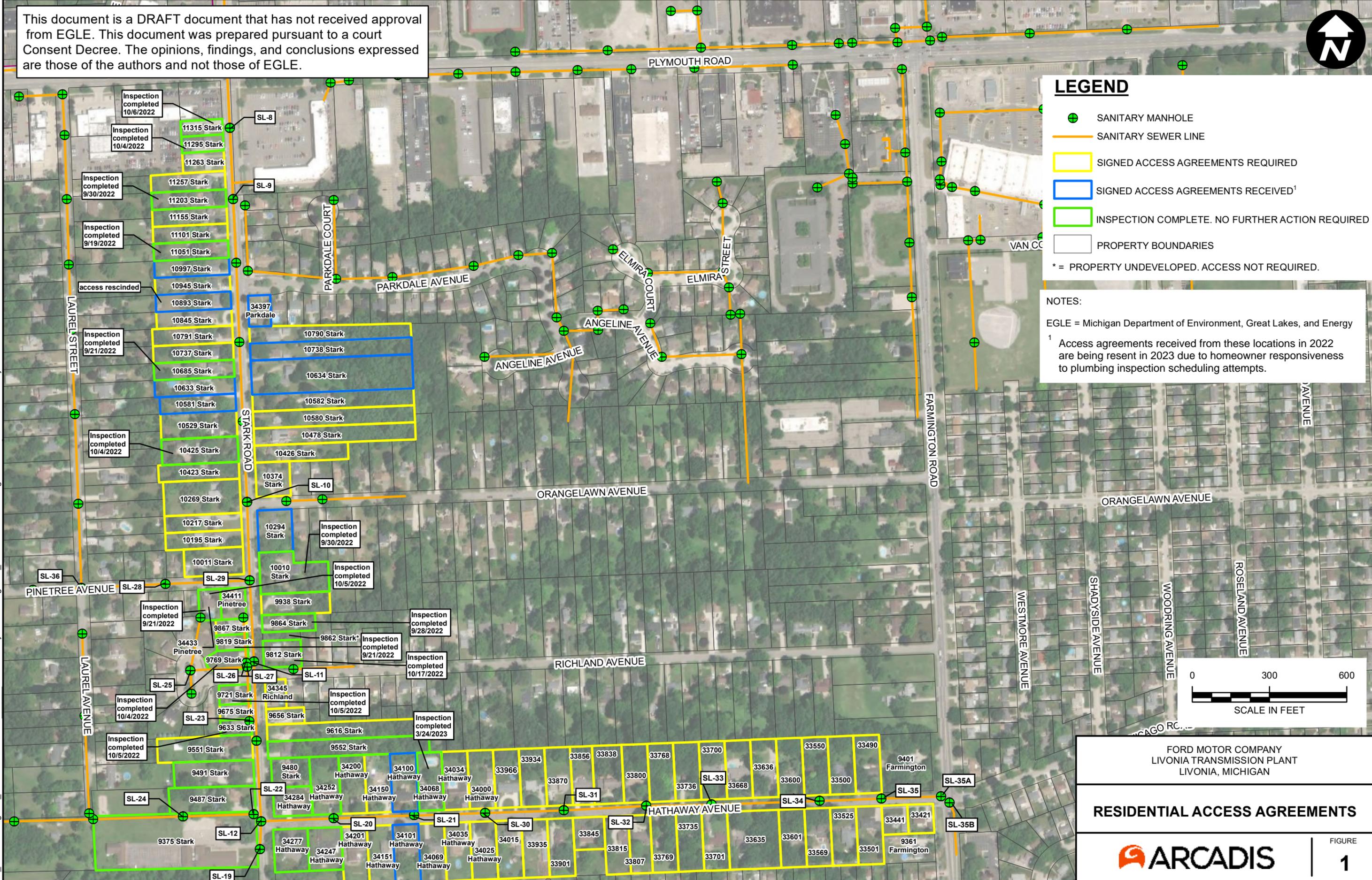
### LEGEND

- SANITARY MANHOLE
- SANITARY SEWER LINE
- SIGNED ACCESS AGREEMENTS REQUIRED
- SIGNED ACCESS AGREEMENTS RECEIVED<sup>1</sup>
- INSPECTION COMPLETE. NO FURTHER ACTION REQUIRED
- PROPERTY BOUNDARIES

\* = PROPERTY UNDEVELOPED. ACCESS NOT REQUIRED.

NOTES:  
 EGLE = Michigan Department of Environment, Great Lakes, and Energy  
<sup>1</sup> Access agreements received from these locations in 2022 are being resent in 2023 due to homeowner responsiveness to plumbing inspection scheduling attempts.

CITY: NOVI DIV: ENV DB: MG PIC: R. ELLIS PM: K. HINSKEY PROJECT NUMBER: 30080642 COORDINATE SYSTEM: NAD 1983 StatePlane Michigan South FIPS 2113 Feet T: \ENV\Novi\Brighton\_MIFord\Livonia\GIS\docs\GEC\2023\Utility Corridor\Figure 1\_ Residential Access Agreements - North of Hathaway.mxd PLOTTED: 6/21/2023 5:38:47 PM BY: sb011179



FORD MOTOR COMPANY  
 LIVONIA TRANSMISSION PLANT  
 LIVONIA, MICHIGAN

## RESIDENTIAL ACCESS AGREEMENTS

**ARCADIS**

FIGURE 1