

**SUBJECT**

Ford Livonia Transmission Plant -  
Quarterly Residential Mitigation Update Letter  
36200 Plymouth Road, Livonia,  
EGLE Warren District Office  
Wayne County, Michigan

**TO**

Jeanne Schlaufman

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EGLE Site ID No. 82002970

**DATE**

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**PROJECT NUMBER**

30206169.201.02

**DEPARTMENT**

Environment

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On behalf of Ford Motor Company (Ford), Arcadis of Michigan, LLC (Arcadis) has prepared this quarterly update letter regarding the interim preemptive mitigation (IPM) system installation for the Livonia Transmission Plant (LTP) site (the Site) as requested by Michigan Department of Environment, Great Lakes, and Energy (EGLE) via email on May 26, 2019 and on July 26, 2019. As discussed during the meeting with EGLE on October 22, 2020, and documented in the November 30, 2020 letter from EGLE, Ford is providing the mitigation updates on a quarterly basis, with this quarterly update covering the quarter of October through December 2023.

As of December 31, 2023, the following progress has been made at 33 residential properties in the Alden Village subdivision:

- 33 of 33 IPM systems are designed. 31 of 33 are installed and operating. The status of the remaining two are described below:
  - 12124 Boston Post: Between 2018 and 2020, four rounds of sub-slab and indoor air samples were collected from this residence with results below EGLE residential sub-slab volatilization to indoor air criteria. The property owner refused the installation of the mitigation system because no vapor impacts were detected inside or under the residence by the vapor samples collected. Ford and Arcadis will follow the process outlined in the consent decree to request for an alternative monitoring plan in lieu of mitigation in a remedial action plan.
  - 12121 Boston Post: Arcadis has not been granted access to this property and a groundwater monitoring plan is in place in lieu of mitigation.
- 10 of 10 sheds where Retro-Coat™ has been proposed have had it applied to the floor. 10 of 10 garages have had Retro-Coat™ applied to the floor.

Ford has established an Electrical Reimbursement Program to reimburse residents for the electrical costs associated with the operation of IPM systems. The Electrical Reimbursement Program is administered by Arcadis on behalf of Ford. Electrical reimbursements will continue to be processed and distributed on a quarterly basis.

As described in the EGLE letter dated February 1, 2019, EGLE required the entirety of the residential structure floor to be depressurized to a minimum of -0.02 inches of water column (iwc) for the residential IPM system. Due to various reasons such as competency of the slab and subgrade obstructions, -0.02 iwc could not be met for select homes. The issue was discussed with EGLE which ultimately recommended the installation of vacuum

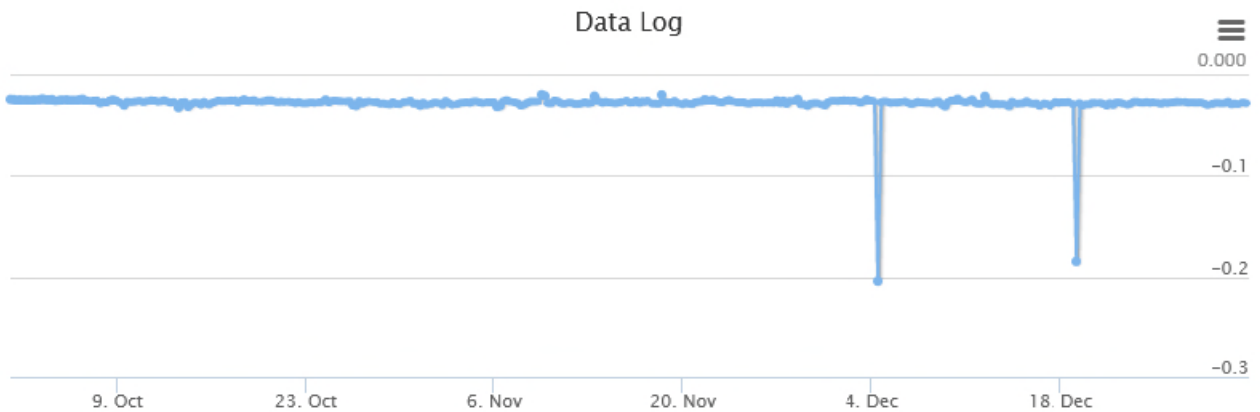
transmitters at these structures. The transmitters continuously monitor the presence of vacuum below the slab to confirm that a negative differential pressure is being maintained which may be less than -0.02 iwc. The graphs of the continuously monitored differential pressure at these structures are depicted below. Arcadis continues to work diligently to maintain the IPM systems.

Details are provided below for all 33 locations.

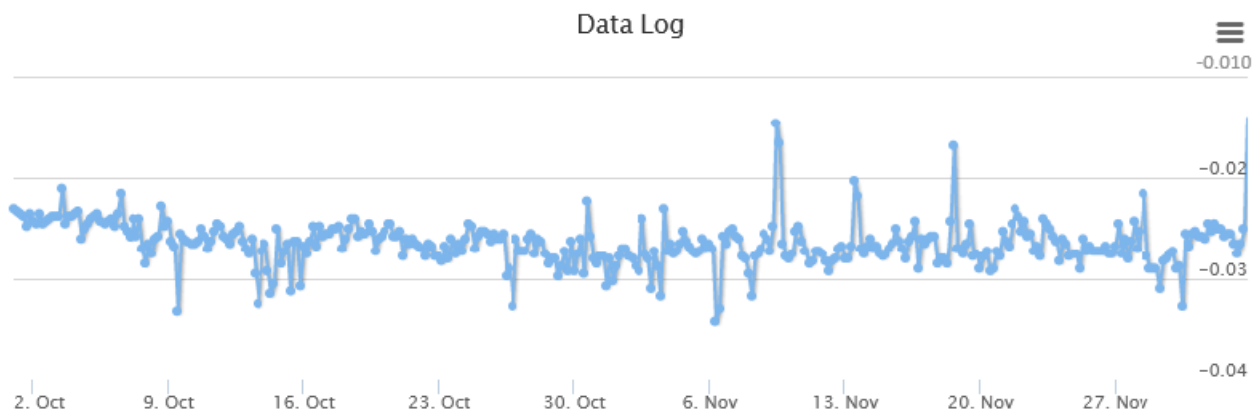
**Interim Preemptive Mitigation Systems Currently Operating**

- **34380 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34424 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34450 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34550 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34591 Beacon** – The system is currently in operation and is being maintained and monitored.

An update of the data logged by the vacuum transmitter connected to SSMP-1 is presented below.

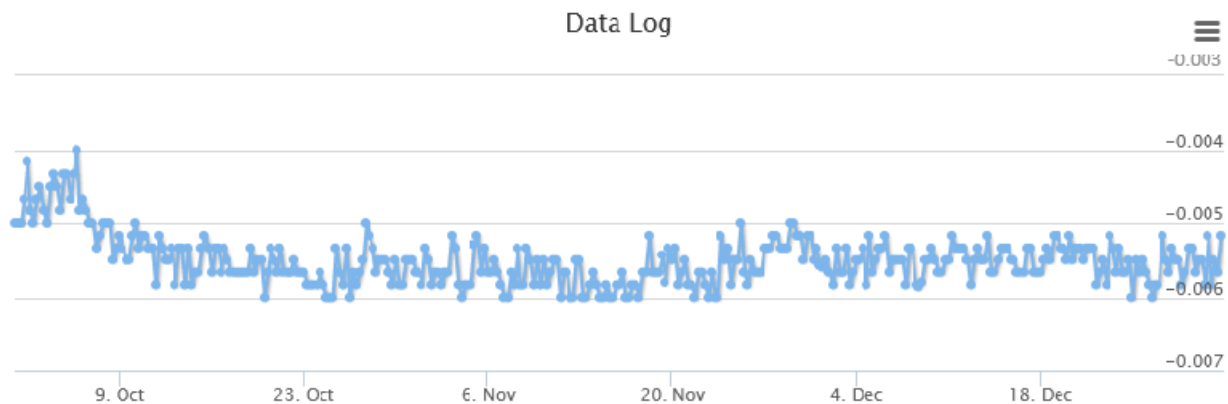


A zoomed in portion of the data logged shows the system continued to operate effectively.



- **34600 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34644 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34682 Beacon** – The system is currently in operation and is being maintained and monitored. The third annual OM&M event was completed on December 12, 2023. Arcadis collected the following vacuum readings: MP-4: -0.011 in wc, MP-5: -0.009 in wc, SSMP-1: -0.017 in wc, SSMP-3: -0.017 in wc, and SSMP-5: -0.015 in wc. SSMP-2 and SSMP-4 are currently inaccessible due to ongoing home renovations. Arcadis recalibrated the vacuum transmitter. An update of the data logged by the vacuum transmitter connected to MP-5 is presented below following calibration of the transmitter.

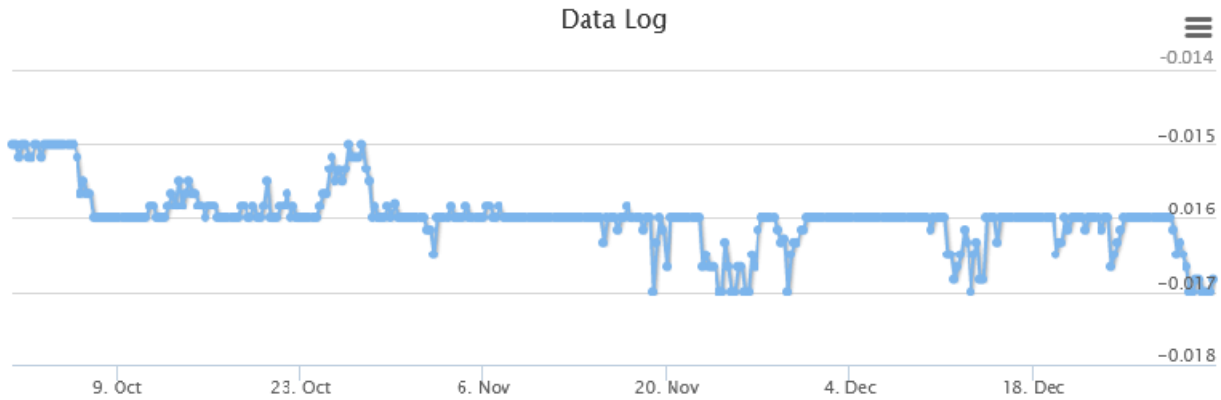
An update of the data logged by the continuously monitored vacuum transmitter connected to sub-membrane monitoring point MP-5 is presented below.



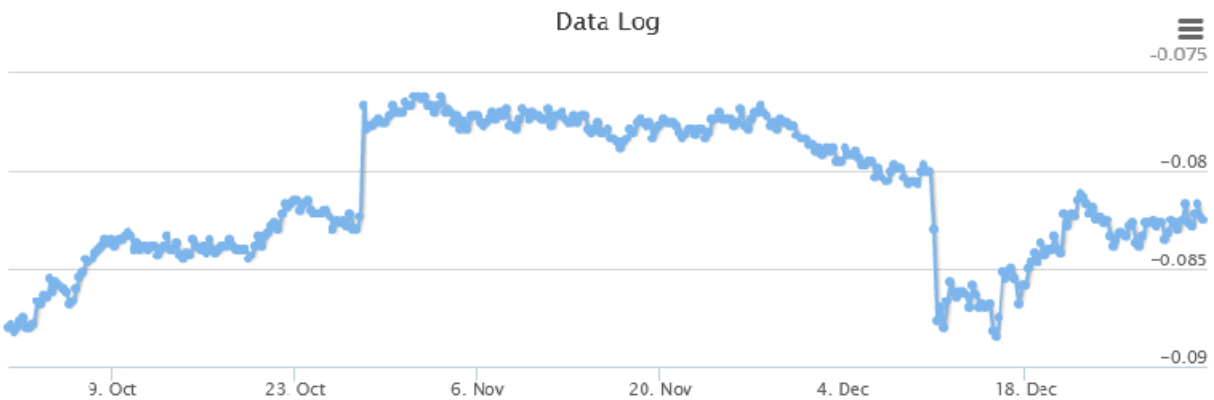
Monitoring in accordance with the EGLE-approved, property-specific monitoring program is underway. Fourth quarter 2023 groundwater sampling results for vinyl chloride were 1.0 µg/L at MW-115S and did not exceed the historical high of 3.9 µg/L observed in November 2019. The vinyl chloride concentrations were non-detect at MW-154S and MW-155S and did not exceed the groundwater screening level of 1.0 µg/L. Therefore, additional sub-slab sampling was not required.

- **34920 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34940 Beacon** – The system is currently in operation and is being maintained and monitored.  

Arcadis is scheduled to repair eleven deposits and depressions located in the north-west corner of the basement which were first observed in September 2023. Upon engagement with the Retro-coat® manufacturer, Land Science, and installation contractor, a remedy was determined to grind down to the concrete to remove the deposits and depressions, followed by reapplications of Primer MV (high moisture) and Retro-coat®. This work with the homeowner and contractor is scheduled to occur in February 2024.
- **34950 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34990 Beacon** – The system is currently in operation and is being maintained and monitored. An update of the data logged by the vacuum transmitter connected to MP-7 is presented below.

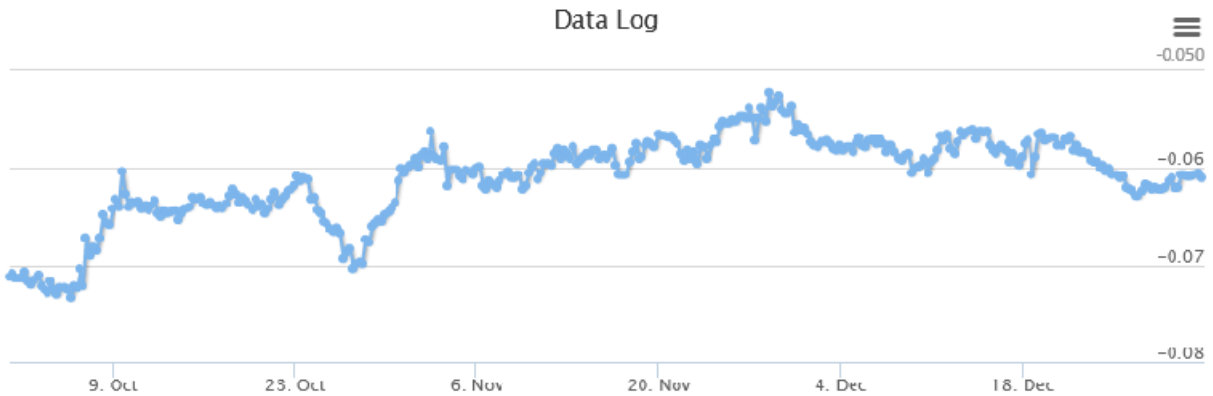


- **12066 Boston Post** – The system is currently in operation and is being maintained and monitored.
  - **12067 Boston Post** – The system is currently in operation and is being maintained and monitored.
- An update of the data logged by the vacuum transmitter connected to MP-1 is presented below.



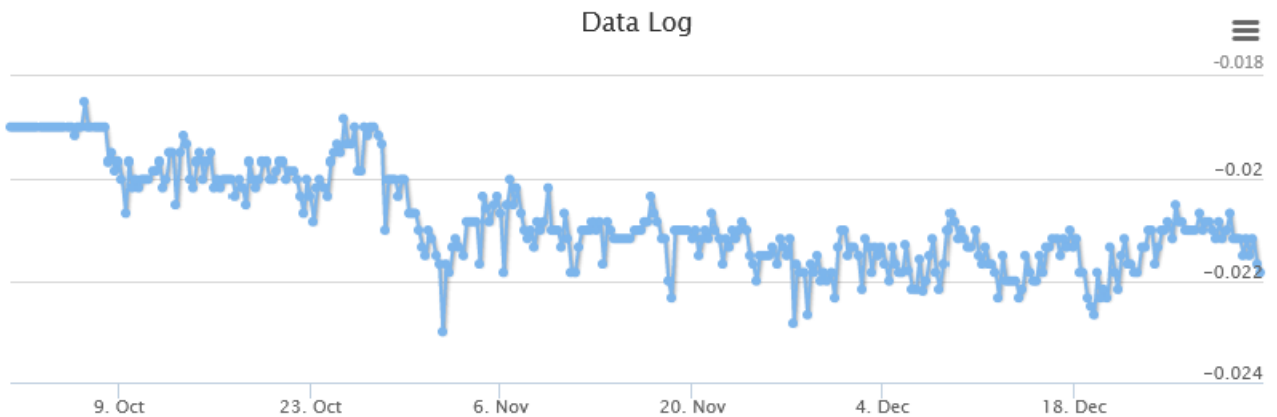
- **12070 Boston Post** – The system is currently in operation and is being maintained and monitored.
- **12089 Boston Post** – The system is currently in operation and is being maintained and monitored.
- **12100 Boston Post** – The system is currently in operation and is being maintained and monitored. On December 29, 2023, Arcadis was notified by the homeowner of a noise and vibration coming from the fan. On January 2, 2024, Arcadis inspected the system fan and cleaned and removed sand that resolved the noise and vibrations.

An update of the data logged by the vacuum transmitter connected to sub-slab monitoring point SSMP-4 is presented below.

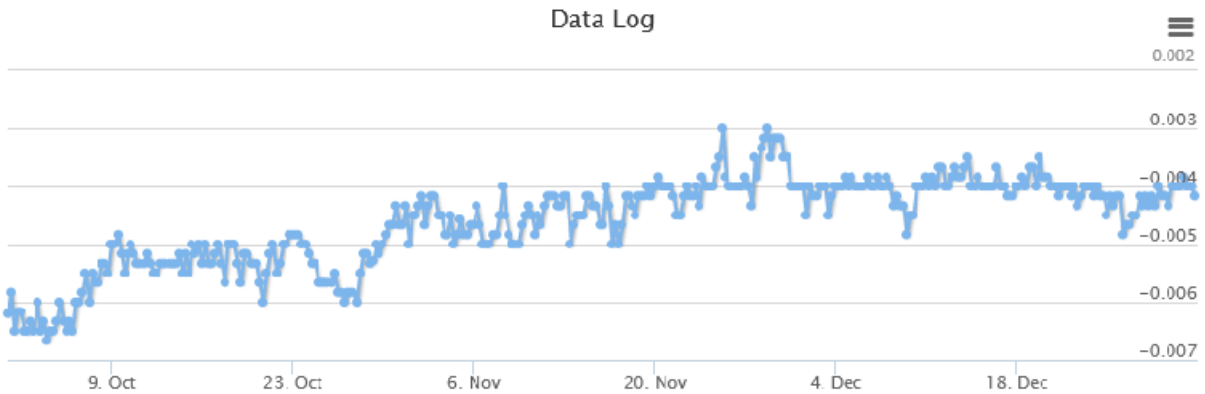


Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. Fourth quarter 2023 groundwater sampling results for vinyl chloride were 1.0 µg/L at MW-115S and did not exceed the historical high of 3.9 µg/L observed in November 2019. The vinyl chloride concentration was 1.5 µg/L at MW-79SR which did exceed the historical high of 1.2 µg/L observed in November 2022. The vinyl chloride concentration was non-detect at MW-156S and did not exceed the groundwater screening level of 1.0 µg/L. As a result of the vinyl chloride concentration at MW-79SR, Arcadis has scheduled sub-slab sampling of SSMP-02 with the property owner for January 29, 2024.

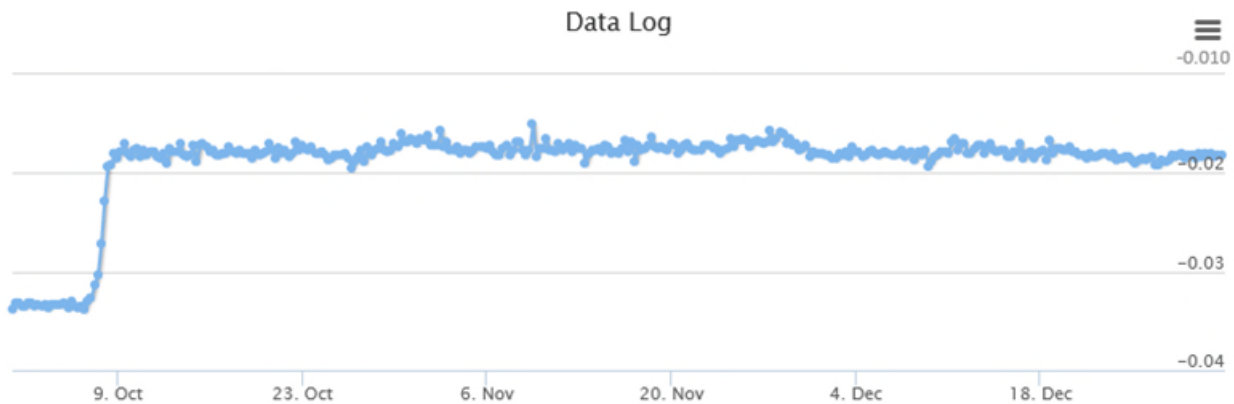
- **12131 Boston Post** – The system is currently in operation and is being maintained and monitored. The update of the data logged by the vacuum transmitter connected to MP-4 is presented below.



- **12141 Boston Post** – The system is currently in operation and is being maintained and monitored. An update of the data logged by the vacuum transmitter connected to MP-4 is presented below.



- **12017 Brewster** – The system is currently in operation and is being maintained and monitored.
- **12036 Brewster** – The system is currently in operation and is being maintained and monitored. An update of the data logged by the vacuum transmitter connected to SSMP-2 is presented below.



- **12075 Brewster** – The system is currently in operation and is being maintained and monitored.
- **12088 Brewster** – The system is currently in operation and is being maintained and monitored.
- **12091 Brewster** – The system is currently in operation and is being maintained and monitored.
- **12101 Brewster** – The system is currently in operation and is being maintained and monitored.
- **34367 Capitol Avenue** – The system is currently in operation and is being maintained and monitored.
- **34380 Capitol Avenue** – The system is currently in operation and is being maintained and monitored.
- **34401 Capitol Avenue** – The system is currently in operation and is being maintained and monitored.
- **34424 Capitol Avenue** – The system is currently in operation and is being maintained and monitored.

Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. Fourth quarter 2023 groundwater sampling results for vinyl chloride were non-detect at MW-90S, MW-103S, and MW-169S and did not exceed the groundwater screening level of 1.0 µg/L. The vinyl chloride concentration was 0.84 µg/L at MW-136S and did not exceed the historical high of 3.2 µg/L observed in November 2020.

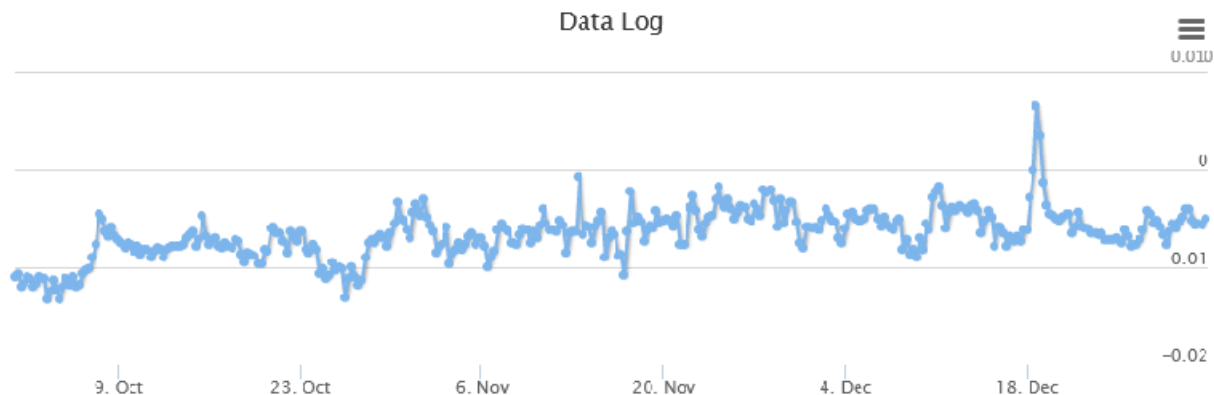
The vinyl chloride concentration was 2.2 µg/L at MW-148S and did not exceed the historical high of 2.3 µg/L observed in November 2020. Therefore, additional sub-slab sampling is not required.

- **34450 Capitol Avenue** – The system is currently in operation and is being maintained and monitored.

Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. Fourth quarter 2023 groundwater sampling results for vinyl chloride were non-detect at MW-108S, MW-168S, and MW-169S and did not exceed the groundwater screening level of 1.0 µg/L. The vinyl chloride concentration was non-detect at MW-137S and did not exceed the historical high of 1.2 µg/L observed in August 2022. Therefore, additional sub-slab sampling is not required.

- **34480 Capitol Avenue** – The system is currently in operation and is being maintained and monitored. An update of the data logged by the vacuum transmitter connected to SSMP-2 is presented below.

On December 18 2023, there was a short period of time where the vacuum transmitter detected positive readings at SSMP-2. These readings corresponded with high winds that were recorded in Livonia in the evening where wind speeds were 20 to 35 miles per hour. Following the high wind event, vacuum levels at SSMP-2 returned to normal negative levels.



### **Interim Preemptive Mitigation Systems Not Installed**

- **12124 Boston Post** – Three rounds of pre-mitigation indoor air and SS data have been completed. No detections of vinyl chloride were reported in any of the samples. Additionally, all groundwater samples from the closest upgradient monitoring well MW-118S were non-detect in the fourth quarter of 2023 and have been below the groundwater screening level of 1.0 µg/L.
- **12121 Boston Post** – Under the supervision of EGLE, Ford is continuing to monitor groundwater proximate to the home to accommodate the homeowners’ refusal to grant access to their property for other investigation, characterization, or mitigation activities.