

TRANSMITTAL LETTER



To:
Jeanne Schlaufman
Michigan Department of
Environment, Great Lakes &
Energy
27700 Donald Court
Warren, MI 48092

From:
Kris Hinskey

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Copies:

Date:
November 1, 2024

Subject:

Livonia Transmission Plant
EGLE Site ID No. 82002970
Schlaufmanj1@michigan.gov
Quarterly Residential Mitigation
Update Letter

Arcadis Project No.:
30206169

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SUBJECT

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

TO

Jeanne Schlaufman
Environmental Quality Specialist
EGLE Warren District Office
27700 Donald Court
Warren, Michigan 48092-2793
Schlaufmanj1@michigan.gov

EGLE Site ID No. 82002970

DATE

November 1, 2024

PROJECT NUMBER

30206169.0201.02

DEPARTMENT

Environment

NAME

Kris Hinskey
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On behalf of Ford Motor Company (Ford), Arcadis of Michigan, LLC (Arcadis) has prepared this quarterly update letter to the interim preemptive mitigation (IPM) system installations 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 third quarter including July through September 2024.

As of September 30, 2024, 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 2 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 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 interim preemptive mitigation systems. The Electrical Reimbursement Program is administrated 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 for the entirety of the residential structure floor to be depressurized to a minimum of -0.02 inches of water column (iwc) for the residential interim preemptive mitigation systems. 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 who 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 interim preemptive mitigation systems.

Details are provided below for all 33 locations.

Interim Preemptive Mitigation Systems Currently Operating

Throughout the third quarter, there were multiple power outages that affected the neighborhood which often occurred during storm events. During the power outages, the vacuum transmitter recorded stronger negative values than normal which can be observed on the data logs. During the power outages, Arcadis monitored the vacuum transmitters, and the vacuum readings returned to normal negative levels following restoration of power.

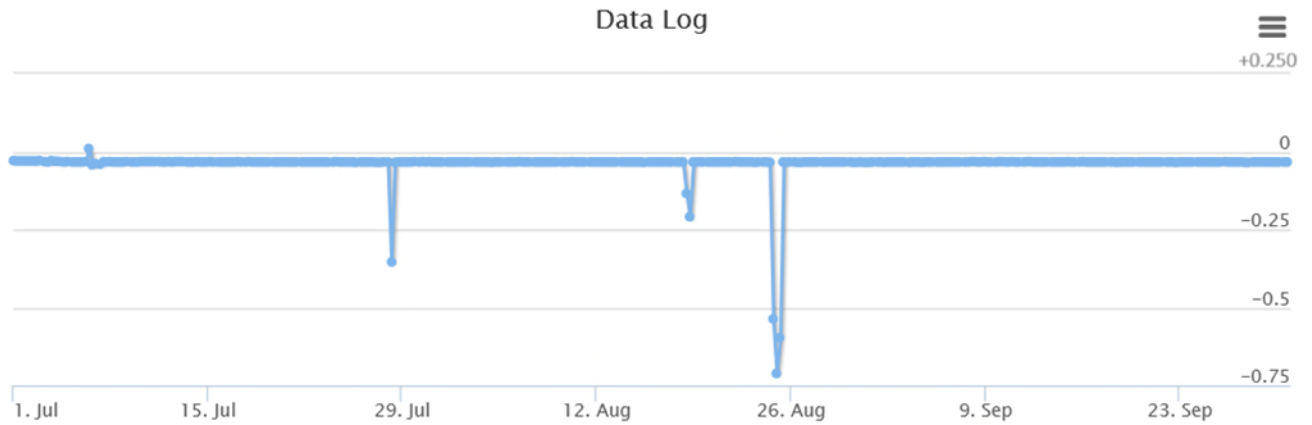
- **34380 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34424 Beacon** – The system is currently in operation and is being maintained and monitored. During the 2Q OM&M check, Arcadis observed cracking in the concrete slab of the shed resulting in damage to the Retro-Coat™ which was outlined in the 2Q quarterly update letter. Additional details regarding the vapor intrusion assessment and recommendations will be provided in the remedial investigation report and response activity plan which are currently being drafted.
- **34450 Beacon** – The system is currently in operation and is being maintained and monitored.

The homeowner was not available on July 11, 2024, following a rain event that produced more than 1 inch of rain in a 24-hour period. The homeowner was available on July 25, 2024, for the inspection and Arcadis inspected the barrier and did not observe any water to remove. On August 8, 2024, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and did not observe any water to remove. Vacuum influence measurements were collected at both inspections following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.

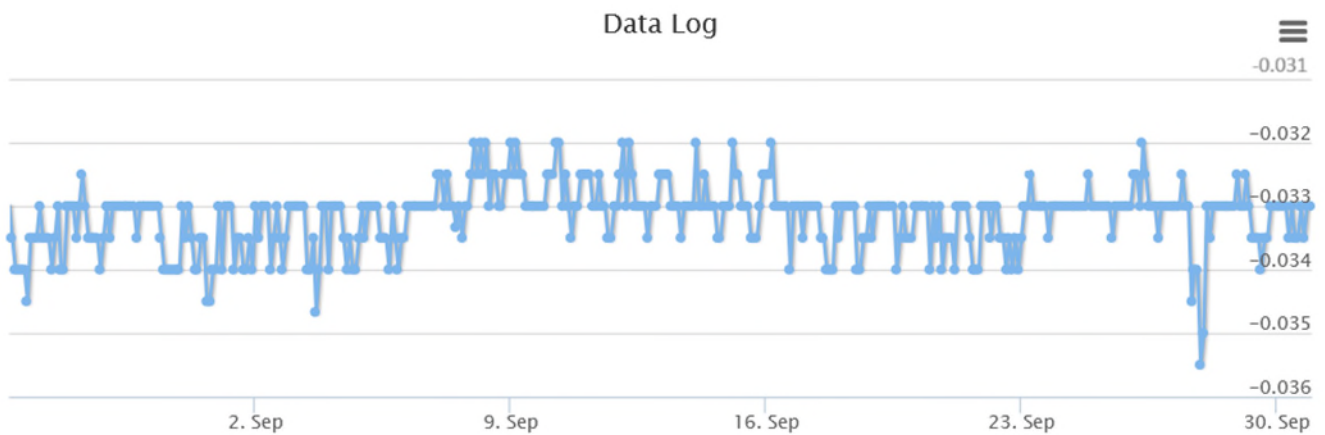
- **34550 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34591 Beacon** – The system is currently in operation and is being maintained and monitored.

On July 11, 2024, and August 8, 2024, following rain events that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and did not observe any water to remove. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc except for SSMP-1 which is continuously monitored by a vacuum transmitter.

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

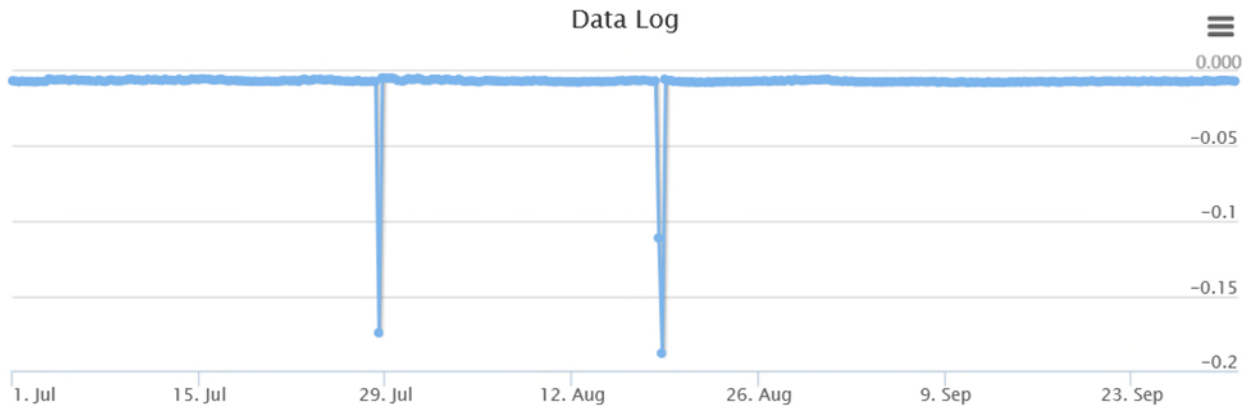


Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.

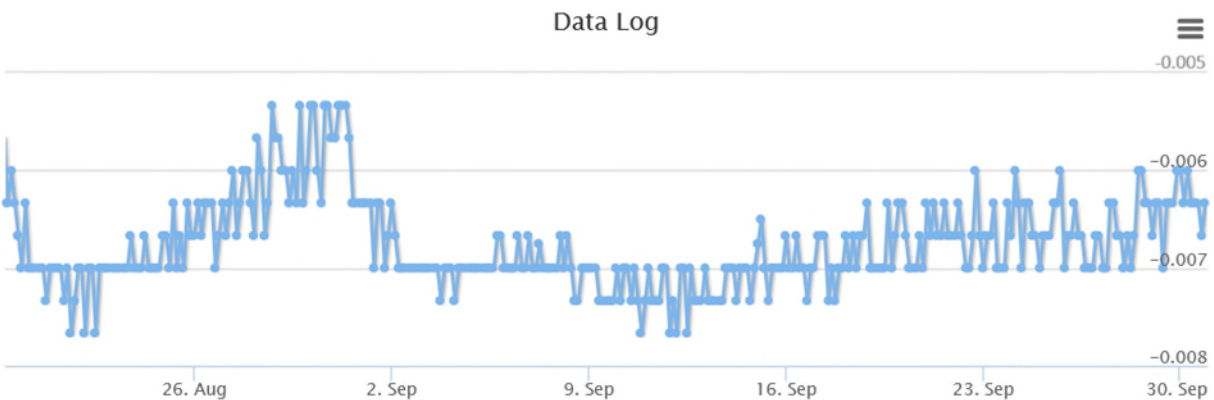


- **34600 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34644 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34682 Beacon** – The system is currently in operation and is being maintained and monitored.

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



Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



Monitoring in accordance with the EGLE-approved property-specific monitoring program is ongoing. The third quarter 2024 groundwater sampling results for vinyl chloride was estimated at 0.87 µg/L at MW-115S and did not exceed the historic high of 3.9 µg/L observed in November 2019. The vinyl chloride concentrations at MW-154S and MW-155S were non-detect 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.

On July 25, 2024, Arcadis conducted a system check and inspected the basement Retro-Coat™. Arcadis observed recently formed rust-colored sediment deposits on the basement floor in the western portion of the basement. Arcadis removed the sediment deposits and sealed the pinholes with plastic sheeting and barrier tape. Water accumulation beneath the Retro-Coat™ was also observed in one location, which was removed and sealed with plastic sheeting and barrier tape.

Arcadis has scheduled a foundation inspection on October 29, 2024, with a contractor to determine the potential methods to install additional dewatering features under the basement concrete slab to reduce hydrostatic pressure which is causing the Retro-Coat™ delamination. Detail regarding this visit will be included in the fourth quarter update letter and a revised interim response activity plan as requested in the

Jeanne Schlaufman
EGLE Warren District Office
November 1, 2024

34940 Beacon Avenue RetroCoat Delamination Request for Revised Interim Response Activity Plan for Mitigation letter received from EGLE on October 25, 2024.

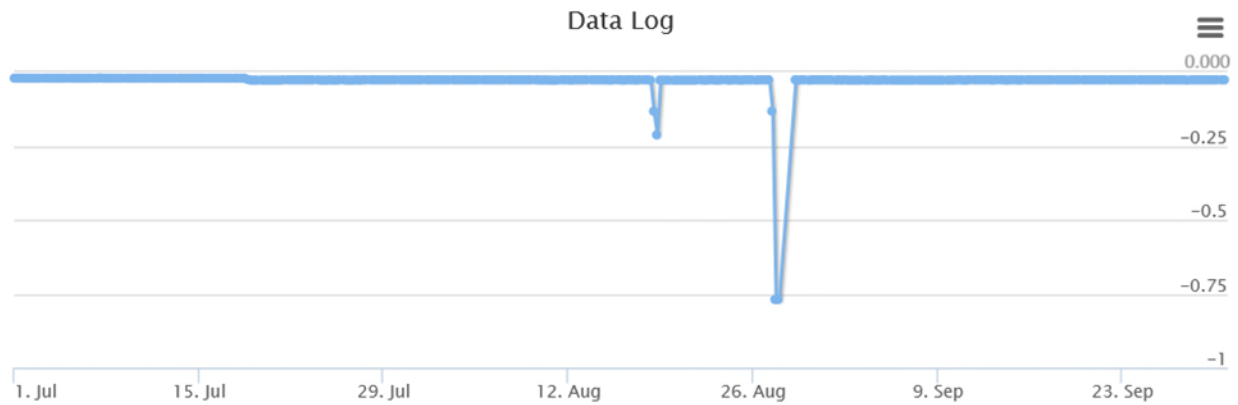


34940 Beacon – Two photographs showing the rust-colored sediment deposits (left) and completed sealing (right). Photographs taken on July 25, 2024.

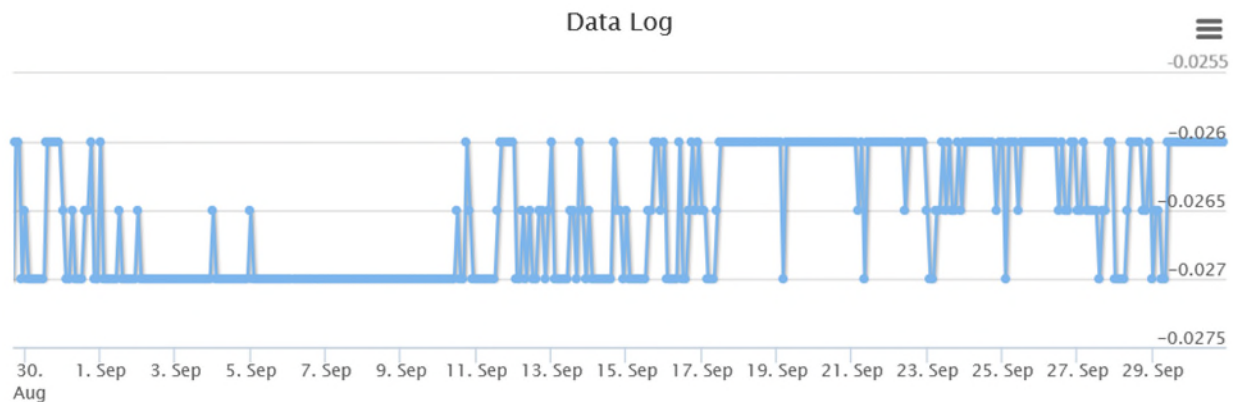


34940 Beacon – Two photographs showing liquid being removed from a crack in the Retro-Coat™ (left) and the sealing with plastic sheeting and barrier tape (right). Photographs taken on July 25, 2024.

- **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.



Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



- **12066 Boston Post** – The system is currently in operation and is being maintained and monitored.

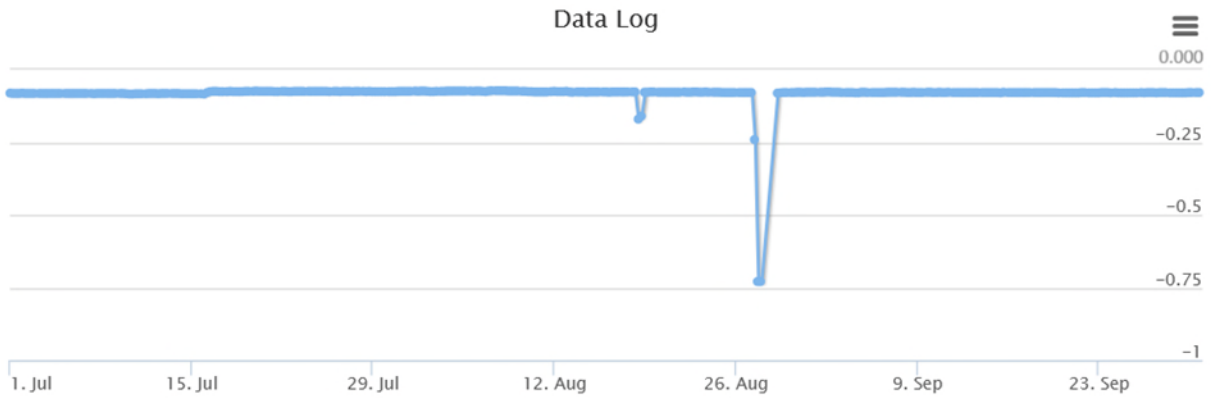
On July 11, 2024, and August 8, 2024, following rain events that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and removed five gallons and one gallon of water, respectively. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.

- **12067 Boston Post** – The system is currently in operation and is being maintained and monitored.

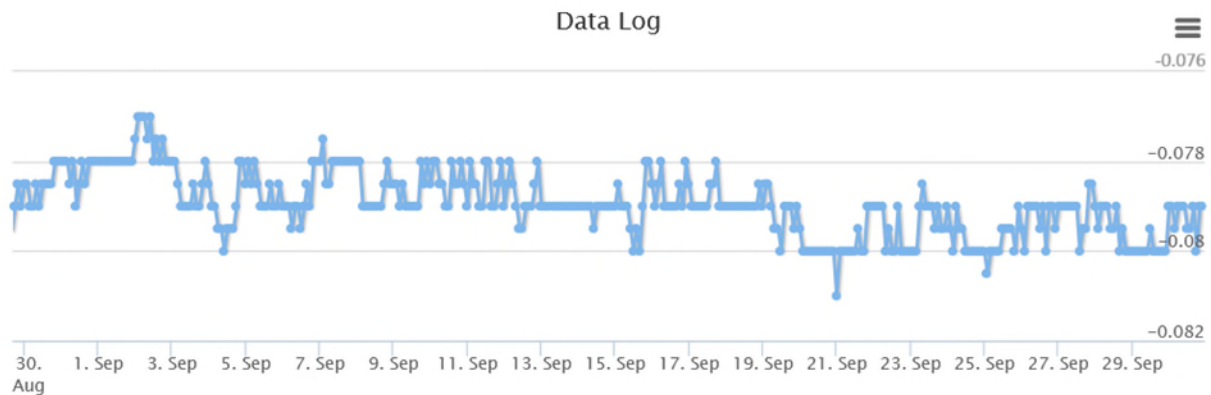
On July 11, 2024, and August 8, 2024, following rain events that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and removed approximately 1.5 gallons and 0.75 gallons of water,

respectively. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.

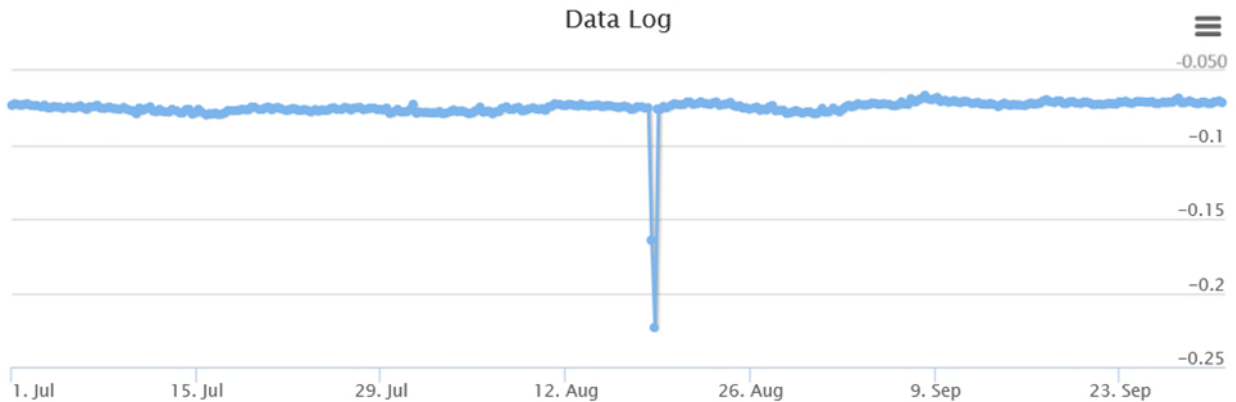
An update of the data logged by the vacuum transmitter connected to MP-1 is presented below.



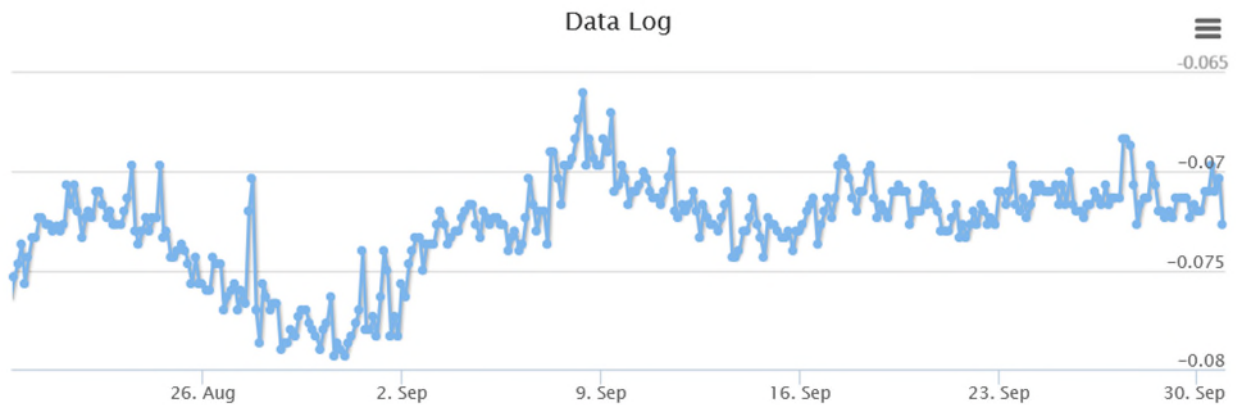
Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



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

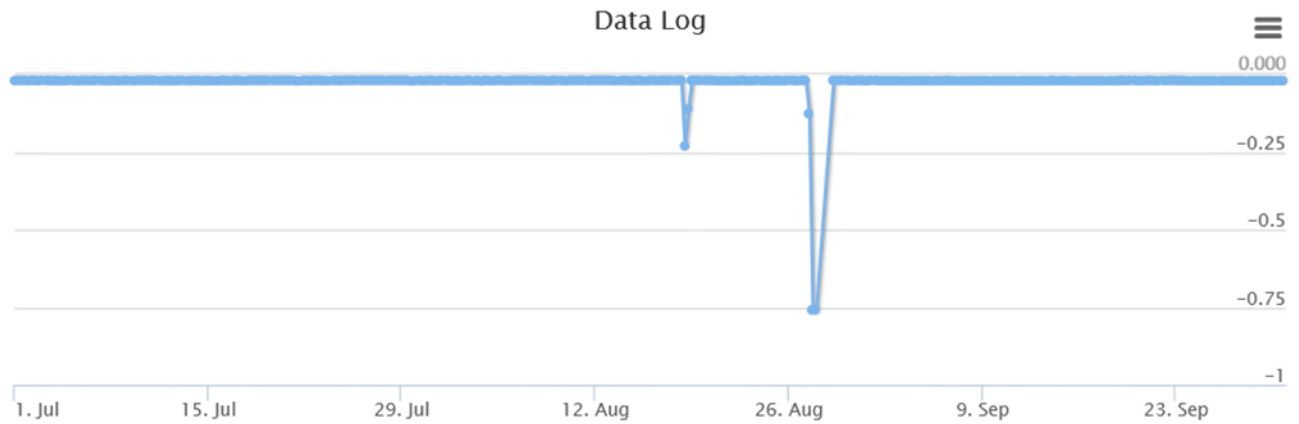


Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.

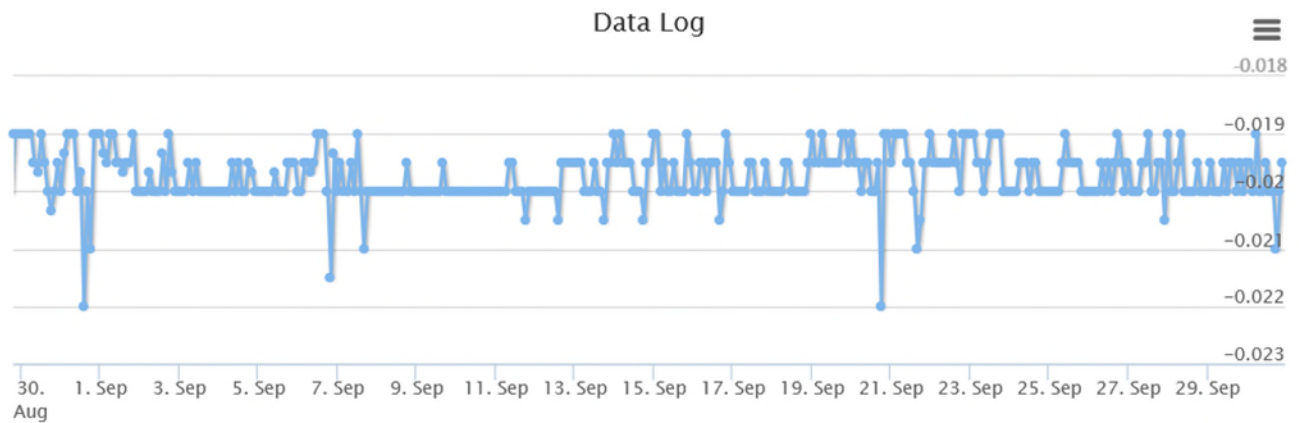


Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. The third quarter 2024 groundwater sampling result for vinyl chloride was estimated at 0.87 µg/L at MW-115S and did not exceed the historical high of 3.9 µg/L observed in November 2019. The vinyl chloride concentration was estimated at 0.67 µg/L at MW-79SR which did exceed the historical high of 1.5 µg/L observed in November 2023. The vinyl chloride concentration was non-detect at MW-156S and did not exceed the groundwater screening level of 1.0 µg/L.

- **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.

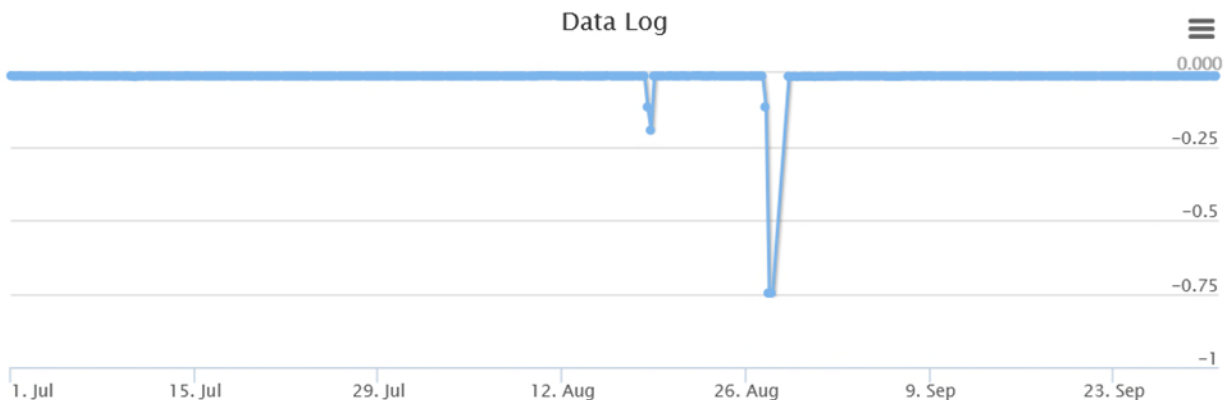


Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.

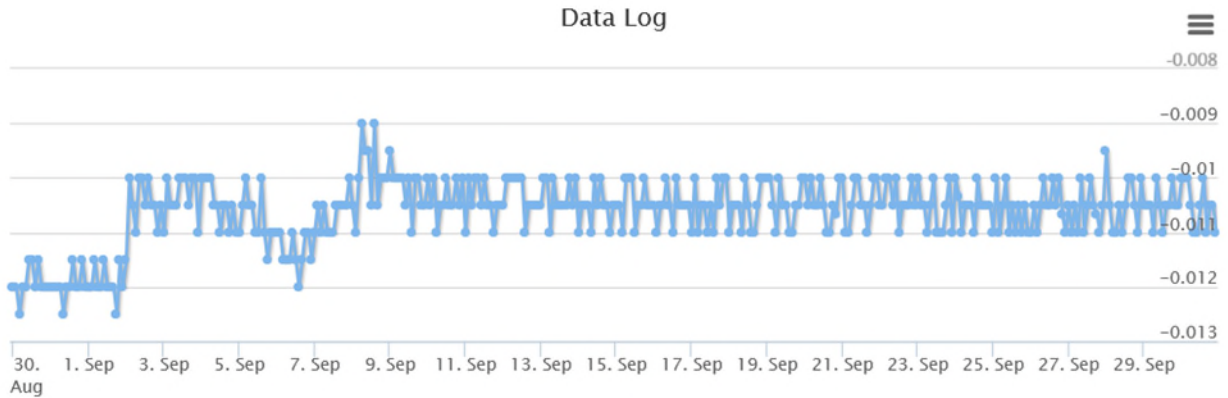


- **12141 Boston Post** – The system is currently in operation and is being maintained and monitored.

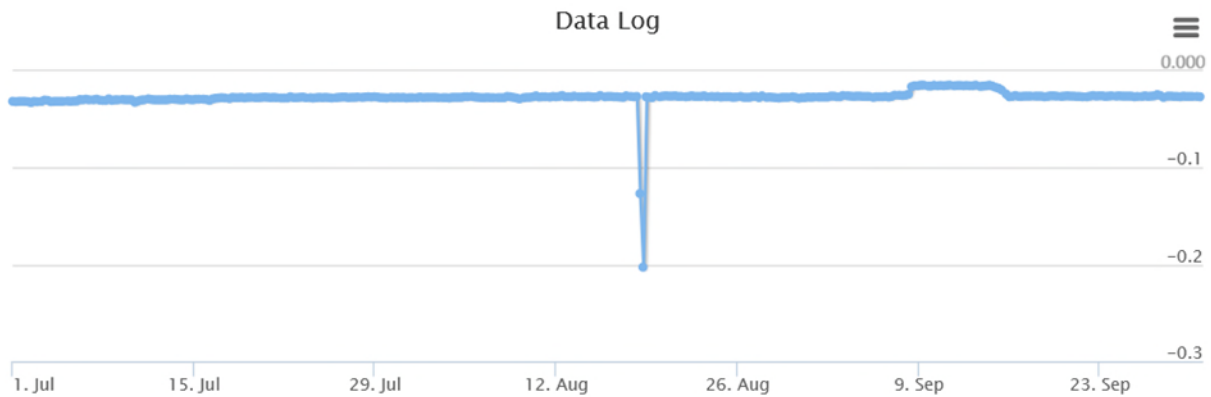
An update of the data logged by the vacuum transmitter connected to MP-4 is presented below.



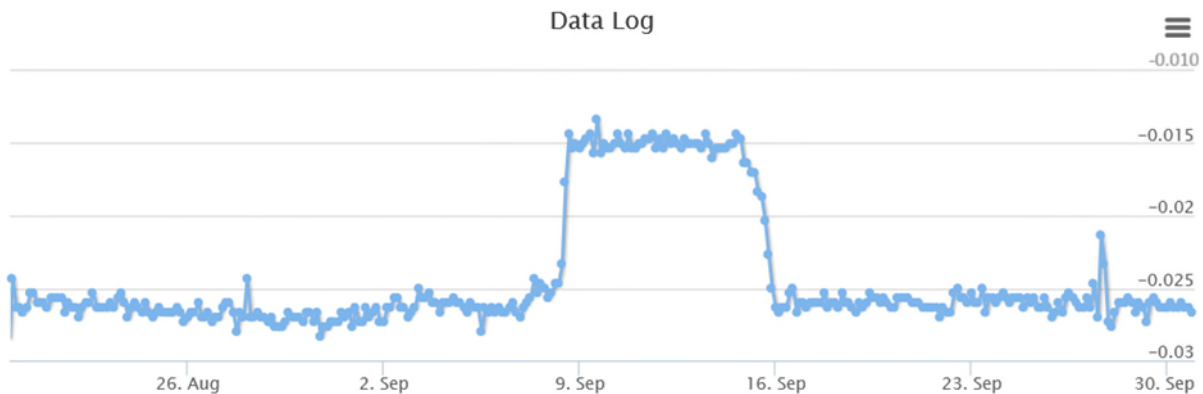
Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



- **12017 Brewster** – The system is currently in operation and is being maintained and monitored. The fourth annual OM&M event was completed on July 25, 2024. Vacuum influence measurements were collected, and all readings exceeded the performance metric established by EGLE of -0.02 iwc.
- **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.



Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



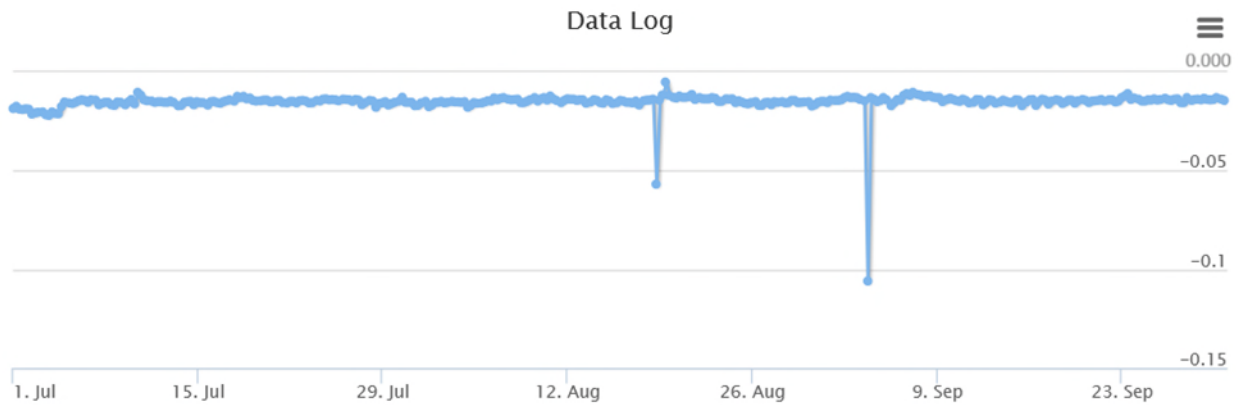
- **12075 Brewster** – The system is currently in operation and is being maintained and monitored.
On July 11, 2024, and August 8, 2024, following rain events that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and removed approximately 0.25 gallons and 0.5 gallons of water, respectively. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.
- **12088 Brewster** – The system is currently in operation and is being maintained and monitored.
On July 11, 2024, and August 8, 2024, following rain events that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and did not observe any water to remove. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.
- **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.
On July 11, 2024, and August 8, 2024, following rain events that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and did not observe any water to remove. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.
- **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.
On July 11, 2024, and August 8, 2024, following rain events that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and removed approximately two gallons and 1.5 gallons of water, respectively. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.
- **34424 Capitol Avenue** – The system is currently in operation and is being maintained and monitored. The fourth annual OM&M event was completed on July 25, 2024. Vacuum influence measurements were collected, and all readings exceeded the performance metric established by EGLE of -0.02 iwc.

Monitoring in accordance with the EGLE-approved property-specific monitoring program is ongoing. Third quarter 2024 groundwater sampling results for vinyl chloride were non-detect at MW-90S, MW-103S, and

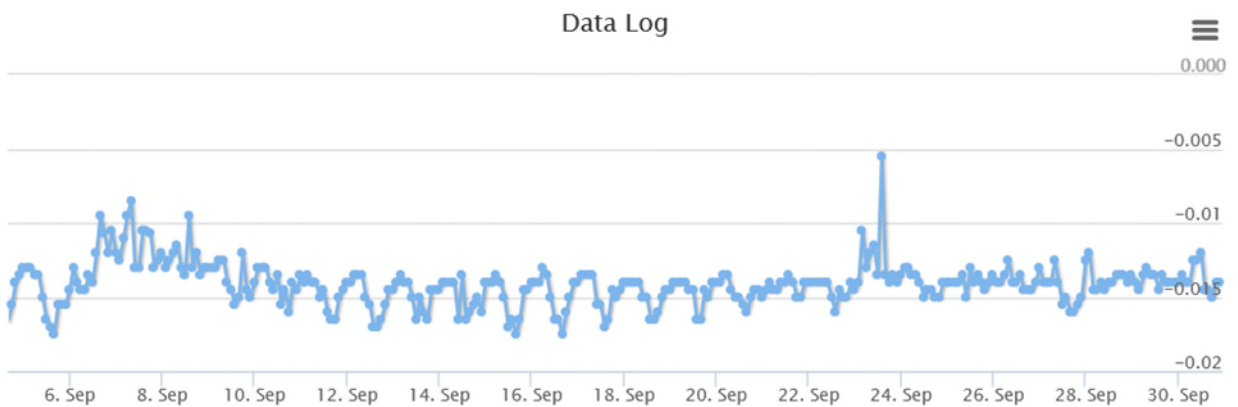
MW-169S and did not exceed the groundwater screening level of 1.0 µg/L. The vinyl chloride concentration was estimated at 0.51 µg/L at MW-136S and did not exceed the historical high of 3.2 µg/L observed in November 2020. The vinyl chloride concentration was estimated at 0.80 µg/L at MW-148S and did not exceed the historical high of 2.3 µg/L observed in November 2020. Therefore, additional sub-slab sampling was not required.

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



Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



Interim Preemptive Mitigation Systems Not Installed

- **12124 Boston Post** – Four rounds of pre-mitigation indoor air and sub-slab data were completed between 2018 and 2020. No detections of vinyl chloride were reported in any of the samples. Additionally, all groundwater samples collected to date from the closest upgradient monitoring well (MW-118S) have been below the groundwater screening level of 1.0 µg/L, including the 3Q2024 sample at 0.51 ug/L

Jeanne Schlaufman
EGLE Warren District Office
November 1, 2024

- **12121 Boston Post** – Under the supervision of EGLE, Ford is continuing to monitor groundwater proximate to the home to accommodate the homeowner's refusal to grant access to their property for other investigation, characterization, or mitigation activities.