

TRANSMITTAL LETTER



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

From:
Megan Meckley

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Copies:

Date:
January 31, 2025

Subject:

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

Arcadis Project No.:
30251157

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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
January 31, 2025

PROJECT NUMBER
30251157.201.02

DEPARTMENT
Environment

NAME
Kris Hinskey
Kristoffer.Hinskey@arcadis.com

On behalf of Ford Motor Company (Ford), Arcadis of Michigan, LLC (Arcadis) has prepared this quarterly update letter to the interim preemptive mitigation (IPM) systems 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 IPM updates on a quarterly basis, with this quarterly update covering the fourth quarter including October through December 2024.

As of December 31, 2024, the status of the 33 residential properties in the Alden Village subdivision is as follows:

- 31 of 33 of the IPMs 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 continues to be denied access to this property.
- 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 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 r the entirety of each residential structure floor to be depressurized to a minimum of -0.02 inches of water column (iwc) for the residential IPM 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 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 although it may not be meeting -0.02 iwc. The

graphs of the continuously monitored differential pressure at these structures are depicted below. Ford continues to work diligently to maintain the IPM systems.

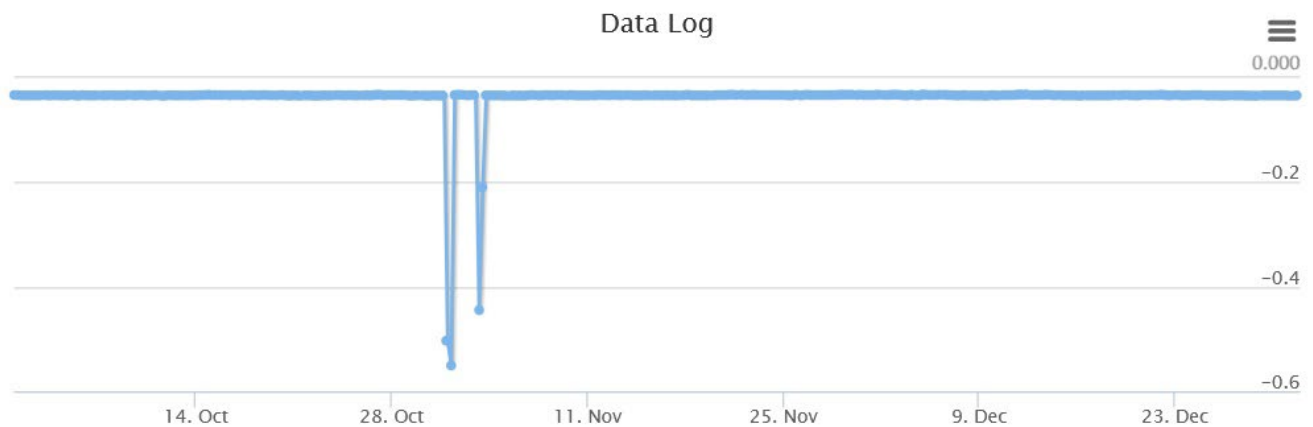
Details are provided below for all 33 locations.

Interim Preemptive Mitigation Systems Currently Operating

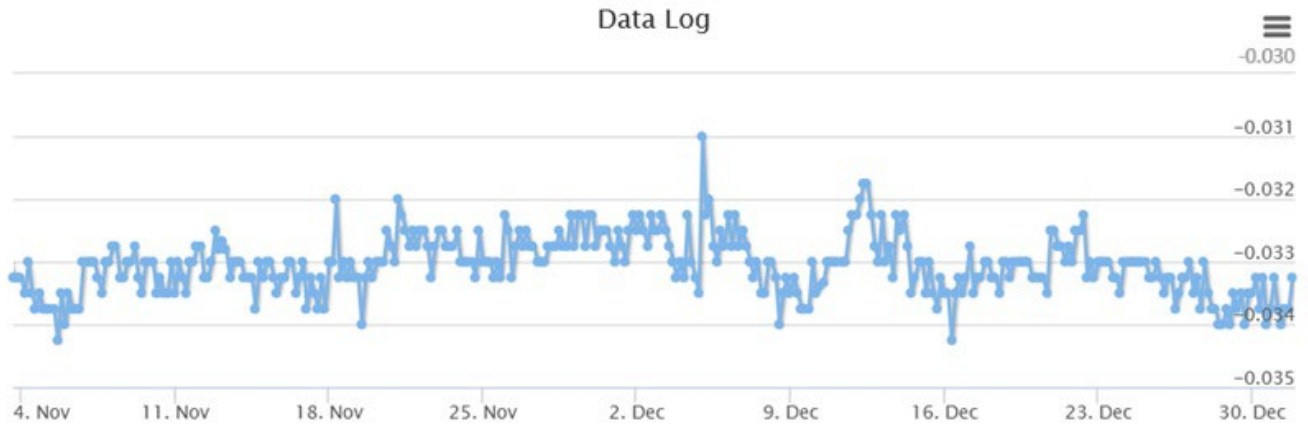
Throughout the fourth quarter, there were multiple power outages that affected the neighborhood which often occur during storm events. During the power outages, the vacuum transmitter recorded stronger negative values than normal which can be observed on the data logs. During the power outages, Arcadis 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. Arcadis previously observed cracking in the concrete slab of the unoccupied shed resulting in damage to the Retro-Coat™ which was outlined in the 2Q 2024 quarterly update letter. Ford and Arcadis continue to follow the guidance outlined in the Consent Decree and alterations to the mitigation system will be requested in the response activity plan
- **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.

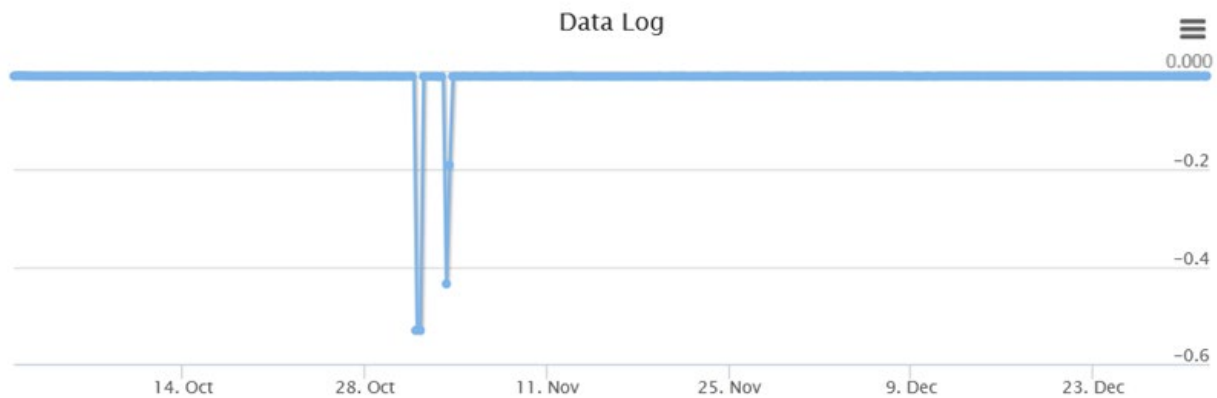


Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.

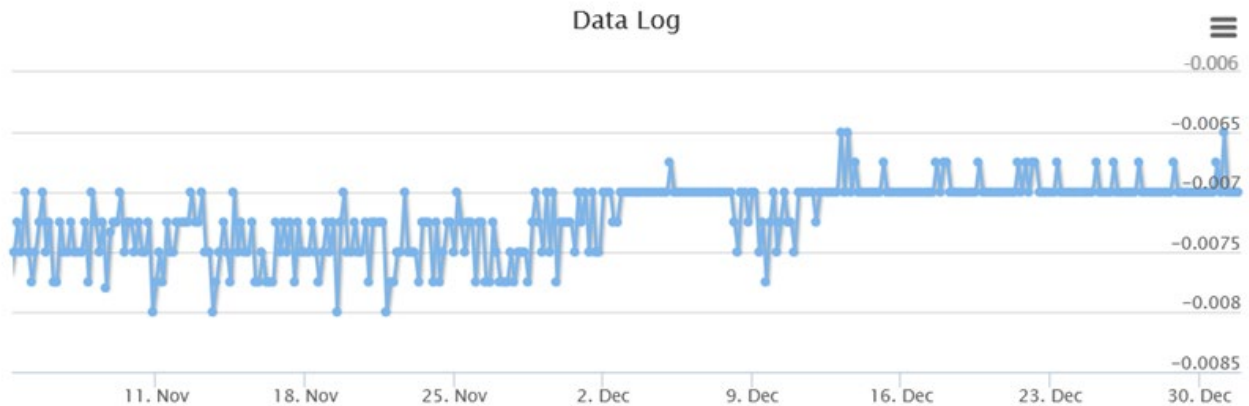


- **34600 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34644 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34682 Beacon** – The system is currently in operation and is being maintained and monitored.

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 fourth quarter 2024 groundwater sampling result for vinyl chloride was 1.3 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 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 October 29, 2024, Arcadis conducted a site visit to inspect the Retro-Coat™ in the basement and to offer the homeowner an air purifying unit for the basement. The homeowner agreed and Arcadis deployed an air purifying unit in the basement. Arcadis inspected the Retro-Coat™ and observed three pinholes, these pinholes were sealed with plastic sheeting and tape.



Photograph 1 – Air purifying unit deployed in the basement. Three Pinholes are sealed with plastic sheeting and red tape.

On November 7, 2024, Arcadis conducted a site visit with a local foundation contractor to evaluate the existing sub-slab perimeter drain and to determine potential methods to install additional dewatering features under the basement concrete slab to reduce hydrostatic pressure which is causing the Retro-Coat™ delamination. The contractor confirmed that the existing sub-slab drain lines appear to be plugged with red

ochre. Arcadis has obtained a proposed scope of work and quote from the contractor for removing the existing sub-slab perimeter drain and replacing it with an equivalent system that has additional maintenance and cleanout ports for preventative maintenance to prevent the red ochre from returning.

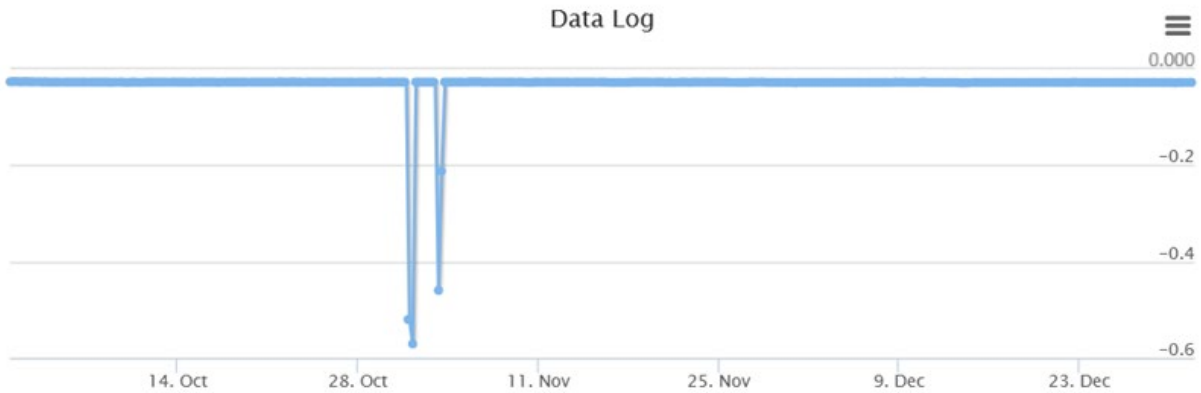


Photograph 2 – The sump basin with clogged inlet pipes.

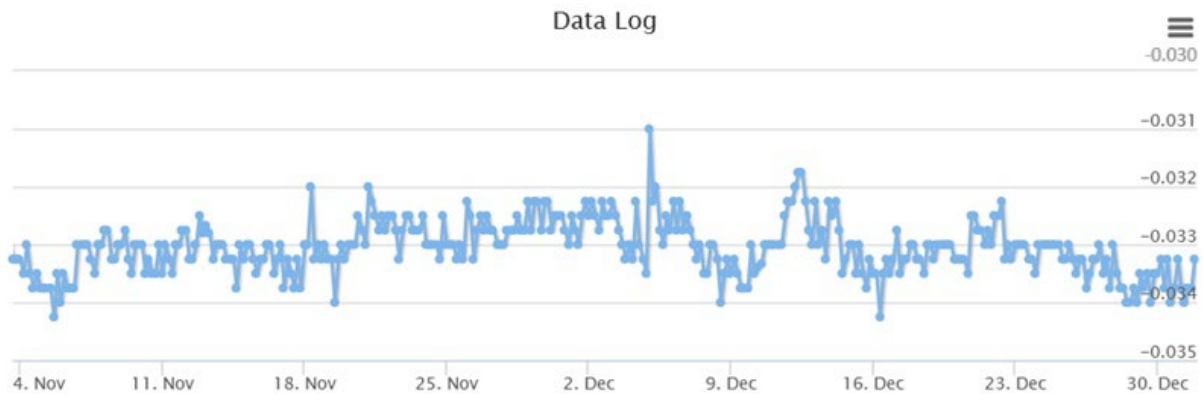
On December 3, 2024, through December 5, 2024, Arcadis completed indoor air and sump sampling at the property as requested by EGLE via electronic correspondence dated November 25, 2024. The 24-hour air samples were deployed on December 4, 2024, and collected on December 5, 2024. This event included collection of the following samples: an outdoor ambient air, first floor indoor air, garage indoor air, basement indoor air and a sump water sample. All air samples were non-detect for the seven site specific constituents. Attached is the data package for the sampling event. The sump water sample was below site-specific volatilization to indoor air criteria for the seven site specific constituents

On December 9, 2024, a Response Activity Plan for a Revised Interim Response Activity Plan – 34940 Beacon Street was submitted to EGLE with recommendations to resolve the delamination observed to date. EGLE approved the plan in a letter dated January 3, 2025 and coordination to implement the recommendations incorporating EGLE's comments is underway. In accordance with this letter, Arcadis will complete monthly indoor air sampling events until repairs at the IPM are completed. The next scheduled monthly indoor air sampling event will be completed during the week of January 27, 2025, based on the homeowner's request.

- **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.

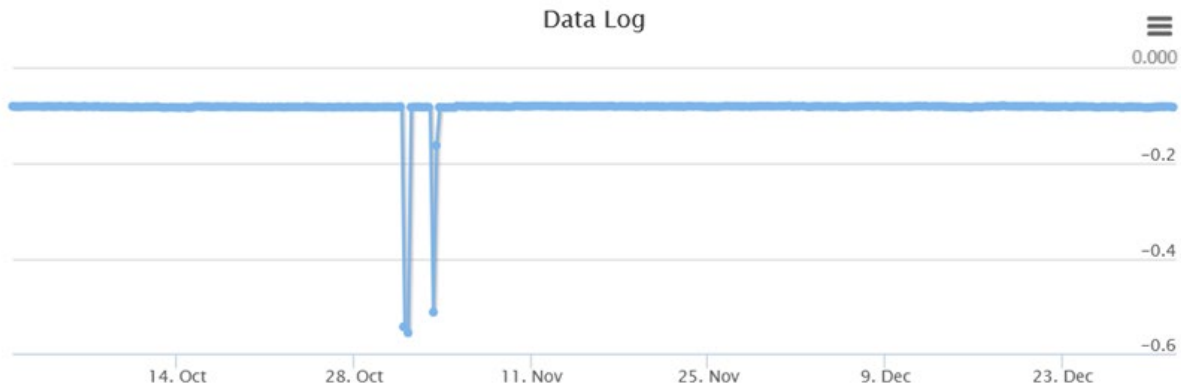


Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.

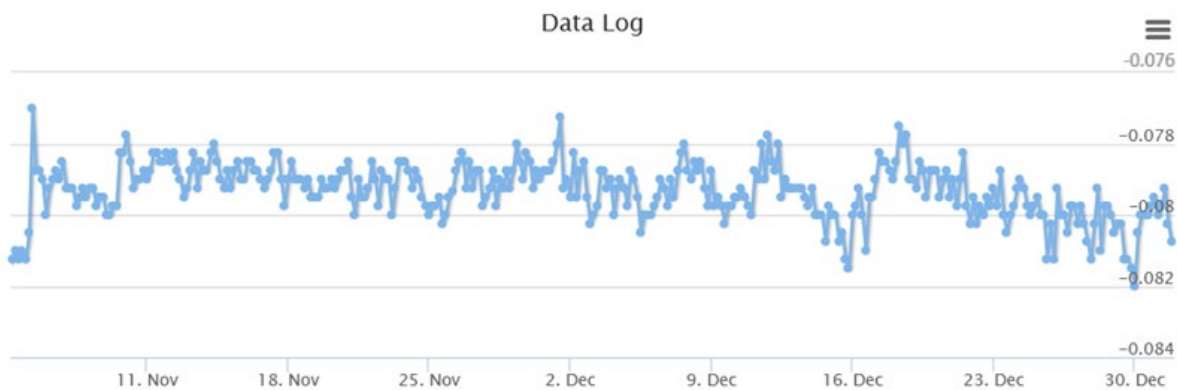


- **12066 Boston Post** – The system is currently in operation and is being maintained and monitored.
- **12067 Boston Post** – The system is currently in operation and is being maintained and monitored.

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



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.



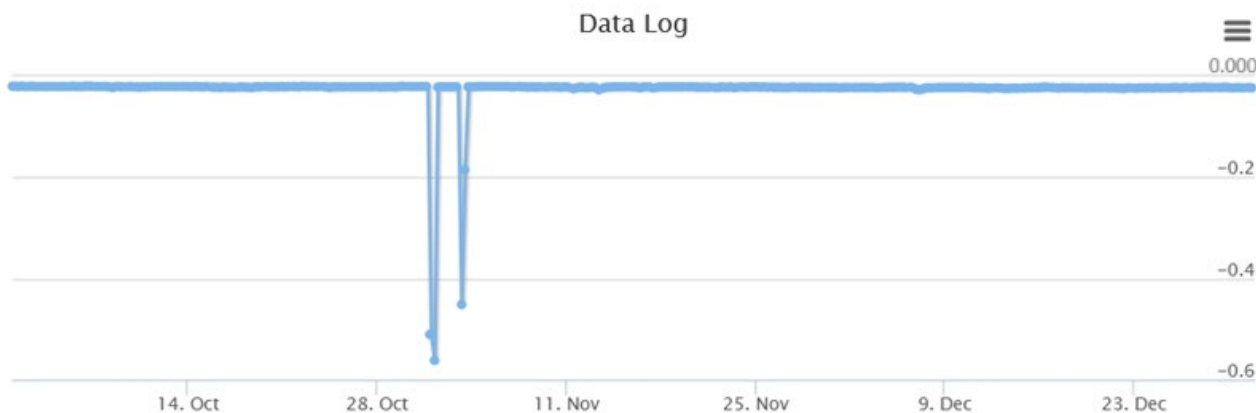
Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. The fourth quarter 2024 groundwater sampling result for vinyl chloride was 1.3 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 1.1 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.

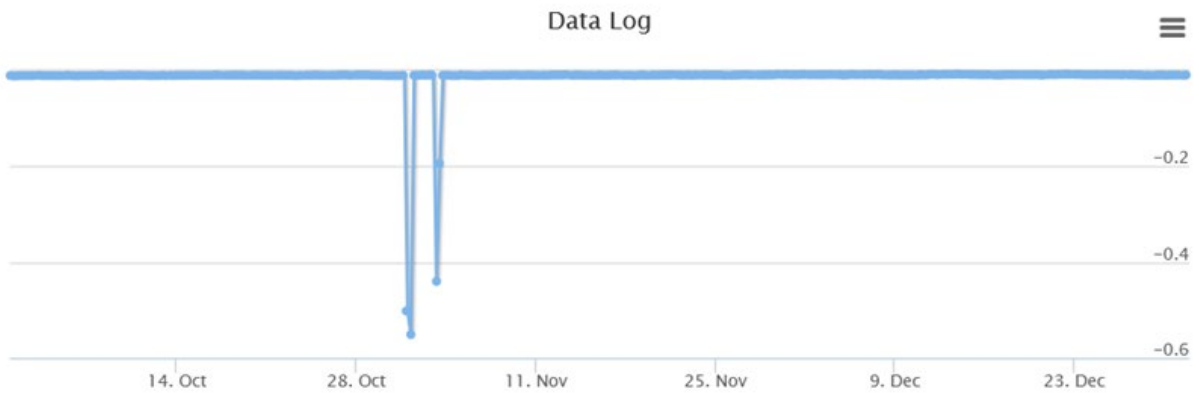
The update of the data logged by the vacuum transmitter connected to MP-4 is presented below.



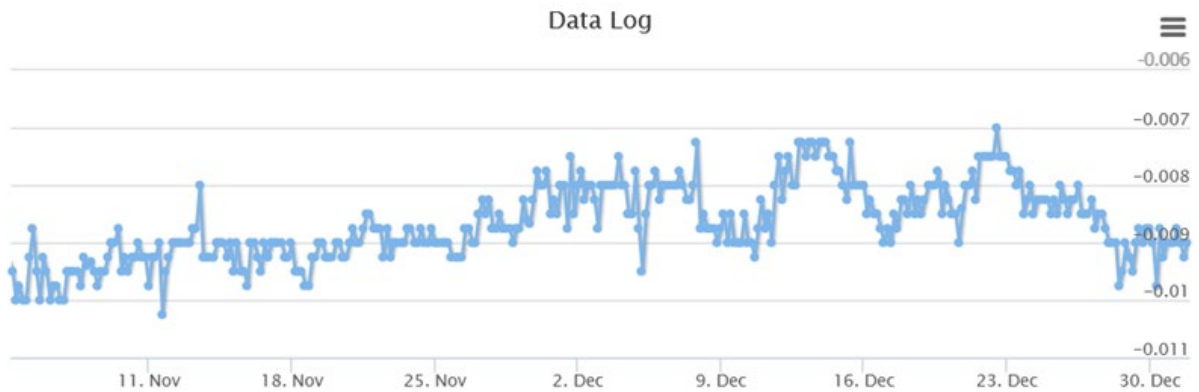
Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



- **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.

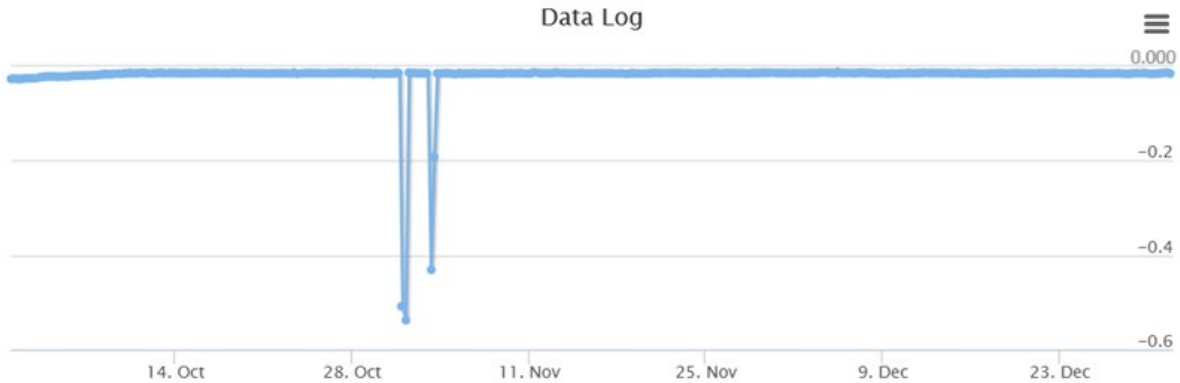


Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



- **12017 Brewster** – The system is currently in operation and is being maintained and monitored.

- **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.
- **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 ongoing. The fourth 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 1.5 µg/L at MW-136S and did not exceed the historical high of 3.2 µg/L observed in

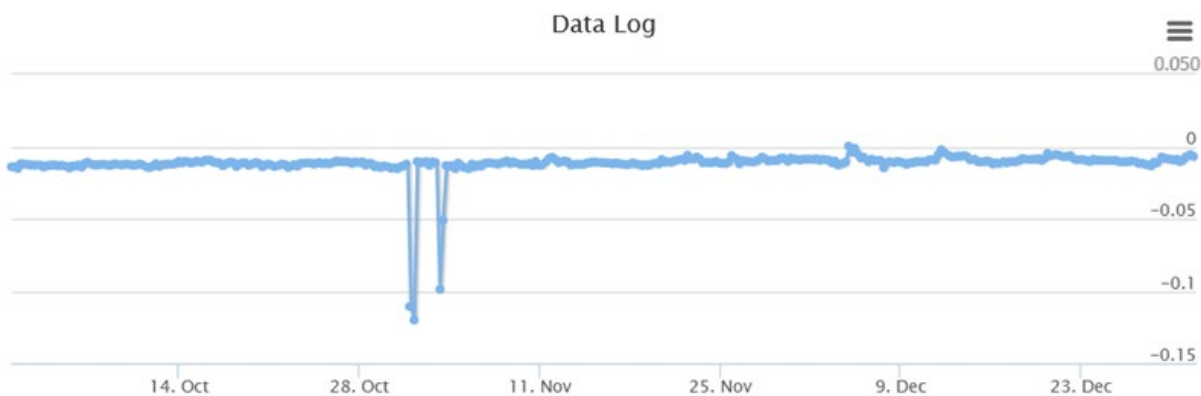
November 2020. The vinyl chloride concentration was 1.9 µg/L at MW-148S and did not exceed the historical high of 2.3 µg/L observed in November 2020. Therefore, additional sub-slab sampling was not required.

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

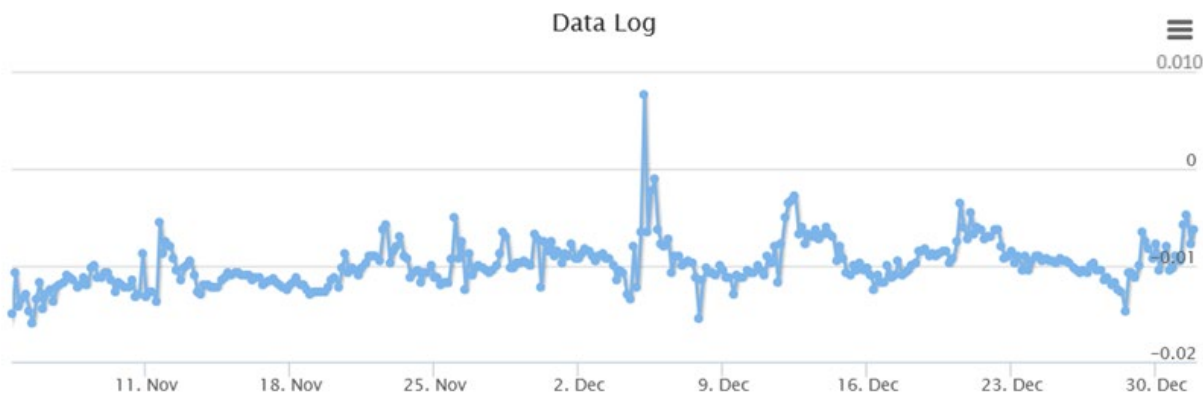
Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. Fourth quarter 2024 groundwater sampling results for vinyl chloride were non-detect at MW-108S, MW-168S, and MW-169S and did not exceed the groundwater screening level of 1.0 µg/L. The vinyl chloride concentration was 0.50 µg/L at MW-137S and did not exceed the historical high of 1.2 µg/L observed in August 2022. Therefore, additional sub-slab sampling was 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.



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

Jeanne Schlaufman
EGLE Warren District Office
January 31, 2025

below the groundwater screening level of 1.0 µg/L, including the fourth quarter 2024 sample which was estimated at 0.56 ug/L.

- **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.

Attachments:

1. 34940 Beacon Vapor Intrusion Assessment Data Package