

SUBJECT

Request for Modification of the Quarterly Progress Reporting Frequency and Contents
36200 Plymouth Road, Livonia, Wayne County, MI
Consent Decree No 2:1712372-GAD-RSW (CD)
Site ID No.: 82002970

TO

Erik Gurshaw
gurshawe@michigan.gov

DATE

September 9, 2025

PROJECT NUMBER

30251157

COPIES TO

Paul Owens, EGLE
Matt Williams, EGLE
Colleen Liddell, Ford
Chuck Pinter, Ford

NAME

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On behalf of Ford Motor Company (Ford), Arcadis of Michigan, LLC (Arcadis) has prepared this letter for the Livonia Transmission Plant (LTP) (the Site) requesting modification of the frequency and contents of the Progress Report which is submitted to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on a quarterly basis. The letter formally requests to change the frequency of the progress report to semi-annual, which was discussed with EGLE during the September 2, 2025 monthly meeting. Additionally, Ford is requesting that the contents of the RespAP-Interim Response Activity Plan ZVI Injections Quarterly Update Letter be included in the semi-annual Progress Report, rather than being provided as a separate quarterly report. This request is a revision to the reporting frequency identified in Section 6.13 and in accordance with Paragraph 22.1 of the Consent Decree filed by EGLE on July 27, 2017 (Number: 2:1712372-GAD-RSW) stating that the MDEQ [EGLE] may provide written approval of modifications of the schedule for the submission of progress reports.

Request to Modify Progress Report Schedule from Quarterly to Semi-annual

Revising the reporting frequency for the Progress Report from quarterly to semi-annually is supported by the following:

- Data has been collected on a quarterly to annual basis from the on-site and off-site groundwater monitoring wells and submitted quarterly to EGLE since 3Q2017.
- Compliance data and performance monitoring data has been collected from the powerhouse treatment system, sub-slab depressurization system, the hydraulic control system, and the sanitary sewer vapor extraction system (collectively referred to as the "Livonia Mitigation Systems") on a monthly to quarterly basis for anywhere from three to seven years, depending on when the specific system was installed.
- Overall, groundwater and systems data has generally stabilized, and minimal change is observed in data and performance trends from quarter to quarter

Request to Modify Progress Report Contents to include ZVI Performance Monitoring Data

Revising the contents of the Progress Report to include the ZVI performance monitoring network data that has previously been submitted in the RespAP-Interim Response Activity Plan ZVI Injections Quarterly Update Letter is supported by the following:

- Groundwater analytical data and sampling field notes are already included in the Progress Report for the performance monitoring network, making the ZVI Quarterly Update Letter repetitive.

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- Data collected from the ZVI performance monitoring network has been stable to decreasing and supports a transition to semi-annual reporting frequency.

Groundwater sampling will continue to be completed on a quarterly, semi-annual, or annual sampling schedule and data will be included in the semi-annual Progress Report submittal. If inconsistent data trends are observed for two consecutive sampling periods which indicate a change in Site conditions, Ford will notify EGLE during the monthly project meetings to determine next steps. If it is determined that an increase in reporting frequency is required due to changing conditions at the Site, a modification to reporting frequency letter request will be submitted.

The proposed reporting submittal schedule is outlined below for 2025 and 2026. This schedule will continue beyond 2026 unless additional modifications are requested.

Proposed Schedule for 2025 and 2026

Timeframe	Report Submittal Date
3Q2025 and 4Q2025	January 31, 2026
1Q2026 and 2Q2026	July 31, 2026
3Q2026 and 4Q2026	January 31, 2027

In closing, Ford requests that EGLE provide written confirmation, approving Ford's request to revise the reporting frequency established in the Consent Decree from quarterly to semi-annually and to include the ZVI performance monitoring network data evaluation in the Semi-Annual Progress Reports. This confirmation is requested to be received by Ford no later than Tuesday, September 30, 2025.