

SUBJECT

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

TO

Erik Gurshaw
EGLE Warren District Office
27700 Donald Court
Warren, Michigan 48092-2793
gurshawe@michigan.gov

EGLE Site ID No. 82002970
CD Number 2:1712372-GAD-RSW

DATE

October 31, 2025

PROJECT NUMBER

30251157.201.02

DEPARTMENT

Environment

NAME

Megan Meckley
Megan.Meckley@arcadis.com

On behalf of Ford Motor Company (Ford), Arcadis of Michigan, LLC (Arcadis) has prepared this quarterly update letter for 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 third quarter including July through September 2025.

As of September 30, 2025, 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 (RAP).
 - 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 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 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 may not be meeting -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. The fifth annual OM&M event was completed on September 18, 2025. All monitoring points achieved the performance metric established by EGLE of -0.02 iwc.

- **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 second quarter 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.

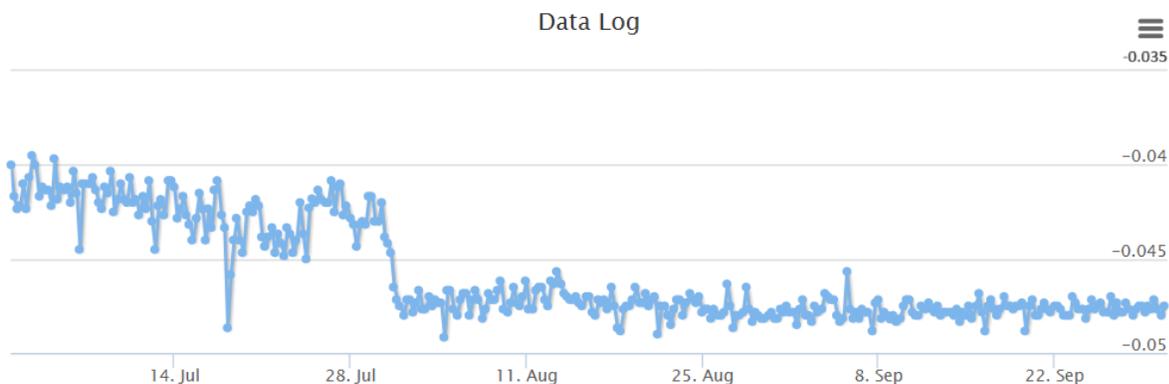
On August 4, 2025, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier in the crawl space and did not observe any water. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric 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 31, 2025, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier, and water was not observed in the crawlspace. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.

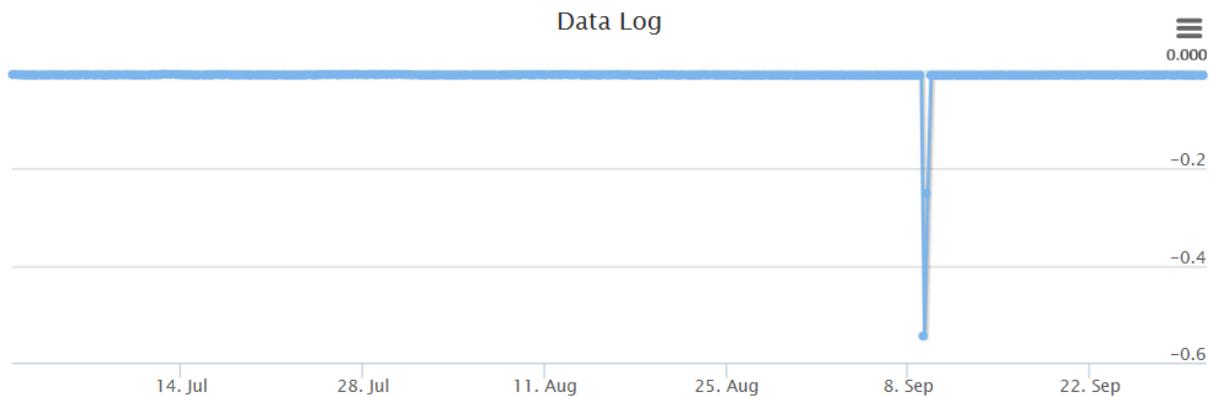
An update of the data logged by the vacuum transmitter connected to SSMP-1 is presented below which shows that the IPM system continues to maintain vacuum level at the monitoring point.



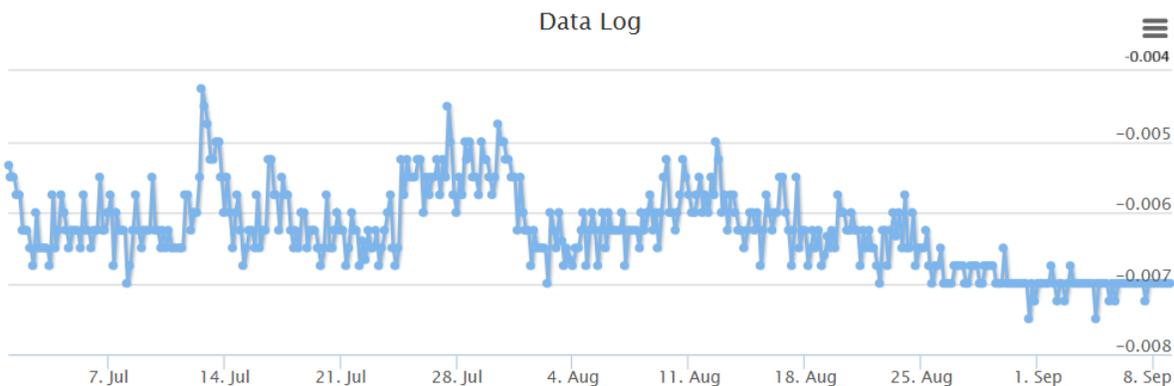
- **34600 Beacon** – The system is currently in operation and is being maintained and monitored.
- **34644 Beacon** – The system is currently in operation and is being maintained and monitored.

- **34682 Beacon** – The system is currently in operation and is being maintained and monitored. The fifth annual OMM event is scheduled for October 27, 2025, which will be summarized in the fourth quarter 2025 update.

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 2025 groundwater sampling results for vinyl chloride detected an estimated 0.68 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. The fifth annual OM&M event was completed on July 12, 2025. All monitoring points achieved the performance metric established by EGLE of -0.02 iwc.

- **34940 Beacon** – The portion of the IPM system in the garage and vapor extraction connected to the sump is currently in operation and is being maintained and monitored. Updates to the IPM were also completed in accordance with the EGLE approval letter for Response Activity Plan-Revised Interim Response Activity Plan – for 34940 Beacon Street dated January 3, 2025, that was prepared to address water under the basement floor that adversely affected the RetroCoat®. The completion report documenting activities related to the Response Activity Plan was submitted to EGLE on June 13, 2025. Monthly Retro-Coat® inspections began in June 2025 to verify delamination was not occurring following implementation.

On July 14, 2025, Arcadis completed an inspection and replaced the cellular antenna on the exterior of the house which was damaged in a storm. Arcadis verified the control panel's remote telemetry was connected and communicating.

On August 18, 2025, Arcadis conducted the final monthly Retro-Coat® inspection following installation. The Retro-Coat® in the basement was in good condition, and repairs were not needed. Arcadis also collected a sump water sample and post-carbon sample. Arcadis completed an inspection of the basement perimeter dewatering system and completed the first OMM flushing and application of oxalic acid to the perimeter dewatering drain. Approximately 4 oz of oxalic acid was added to one cleanout location on each of the four sides of the perimeter dewatering pipe. In addition, an electrician replaced the audible sump basin float alarm and installed a second sump float sensor that was connected to the control panel and remote telemetry system.

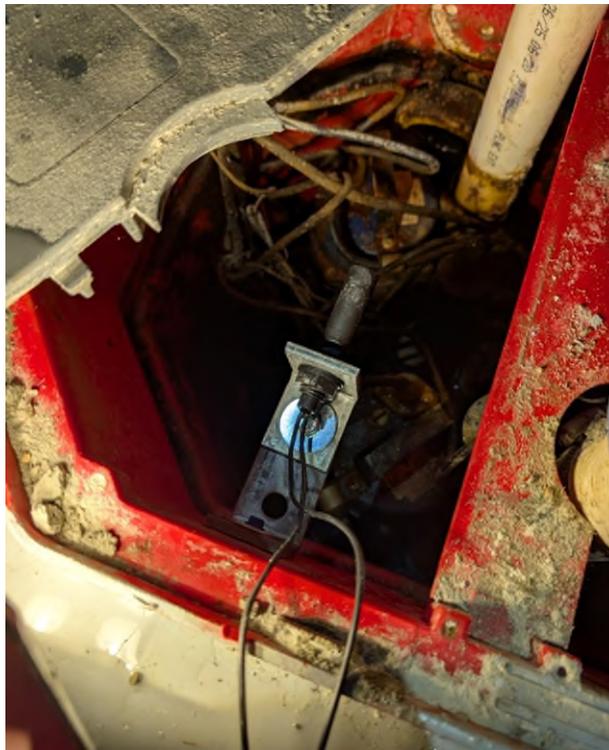


Photo 1: Water float sensor installed in the sump basin.

The August 18, 2025 sampling was the second post-construction quarterly sampling conducted to document performance in accordance with the performance monitoring detailed in the Response Activity Plan-Revised Interim Response Activity Plan – for 34940 Beacon Street. The sump water samples were below site-specific volatilization to indoor air criteria for the seven site specific constituents. The analytical results for the sump water samples are summarized in **Table 1** below.

Table 1 – 34940 Beacon Third Quarter 2025 Sump Water Analytical Results

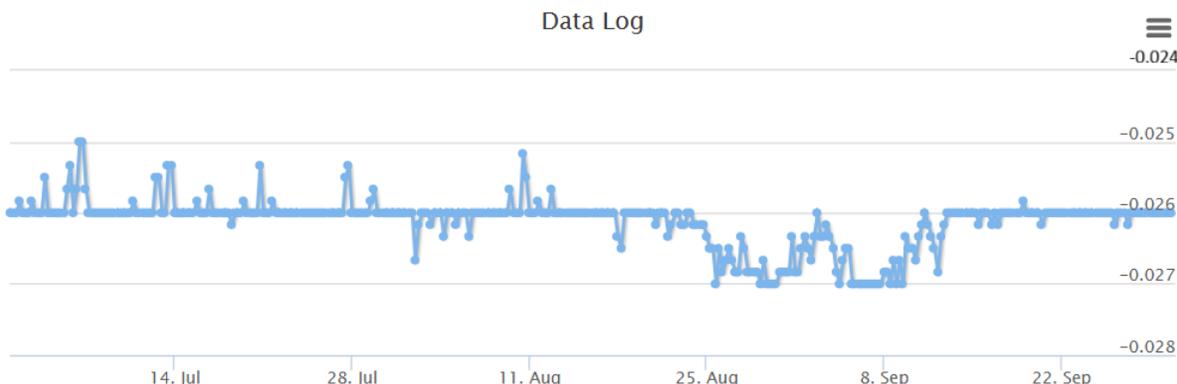
Location:		EGLE Residential SSVIAC	SUMP_34940BEACON	POSTCARBON_34940 BEACON
Date:	Unit		8/18/2025	8/18/2025
Volatile Organic Compounds (VOCs via Method 8260 or 8265)				
1,1-Dichloroethene	µg/L	18	ND (<0.49)	ND (<0.49)
1,4-Dioxane	µg/L	1,900	ND (<0.86)	ND (<0.86)
cis-1,2-Dichloroethene	µg/L	3.4	2.2	2.3
Tetrachloroethene	µg/L	1.5	ND (<0.44)	ND (<0.44)
trans-1,2-Dichloroethene	µg/L	13	ND (<0.51)	ND (<0.51)
Trichloroethene	µg/L	1.0	ND (<0.44)	ND (<0.44)
Vinyl chloride	µg/L	1.0	ND (<0.45)	ND (<0.45)

"<" Denotes indicated the value is below the laboratory method detection limit for the associated sampling event.
 "ND" - Not Detected
 "SUMP" - Basement Sump Water
 "POSTCARBON" - Sump water after carbon treatment

The remaining revised interim activities for this property are to be completed at the schedule outlined below:

- Quarterly samples from the in-line carbon filtration system to be completed during the same quarterly groundwater sampling schedule.
- Maintenance of the perimeter drainage system in the basement concurrent with quarterly sampling.
- **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.

Below is a data plot logged by the vacuum transmitter connected to MP-7 showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



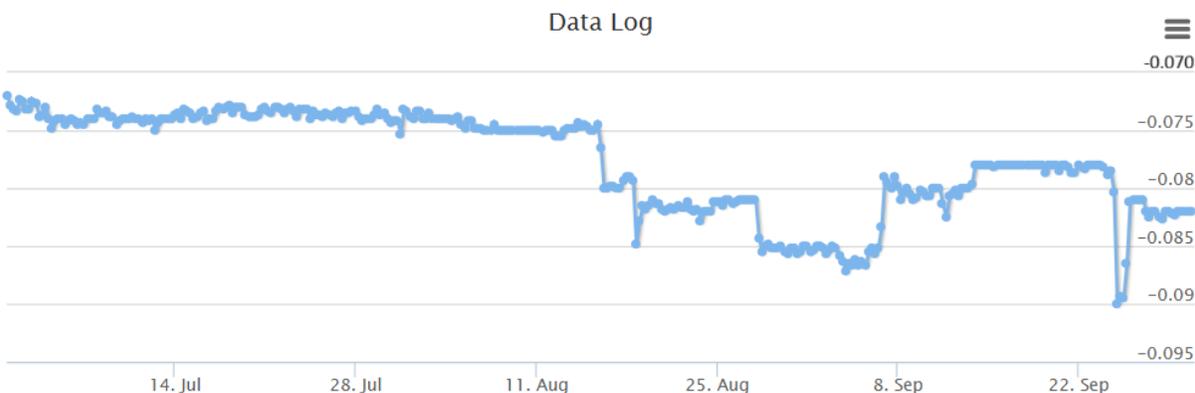
- **12066 Boston Post** – The system is currently in operation and is being maintained and monitored.

On August 4, 2025, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and approximately 3 gallons of water were observed on the barrier near the crawlspace entrance. The water was removed, 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 31, 2025, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and removed approximately 10 gallons of water at the entrance to the crawlspace. Vacuum influence measurements were collected following the rain inspection and readings exceeded the performance metric established by EGLE of -0.02 iwc.

Below is a data plot logged by the vacuum transmitter connected to MP-1 showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.



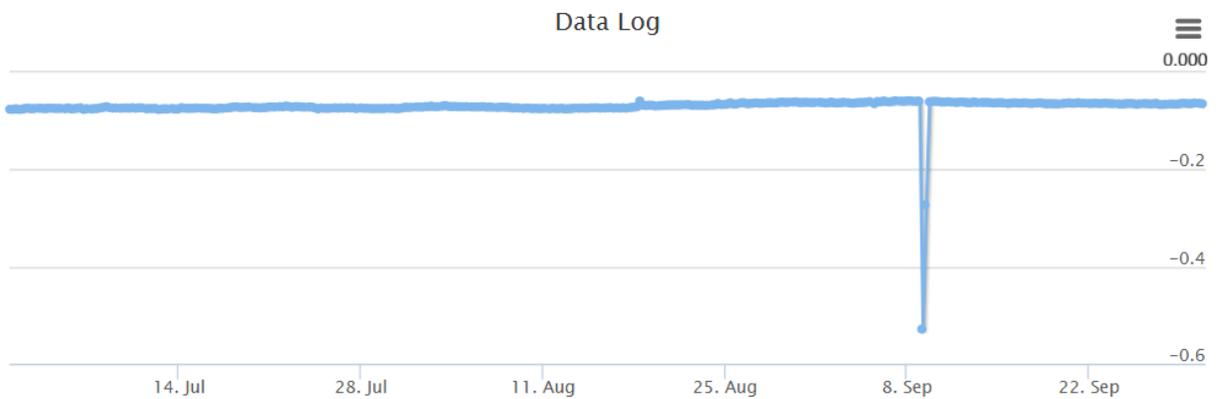
- **12070 Boston Post** – The system is currently in operation and is being maintained and monitored.
- **12089 Boston Post** – The system is currently in operation and is being maintained and monitored.
- **12100 Boston Post** – The system is currently in operation and is being maintained and monitored.

On September 9, 2025, Arcadis removed the AMG Force fan due to a grinding noise from the bearings on the fan. A replacement AMG Force fan was installed on the attached garage.

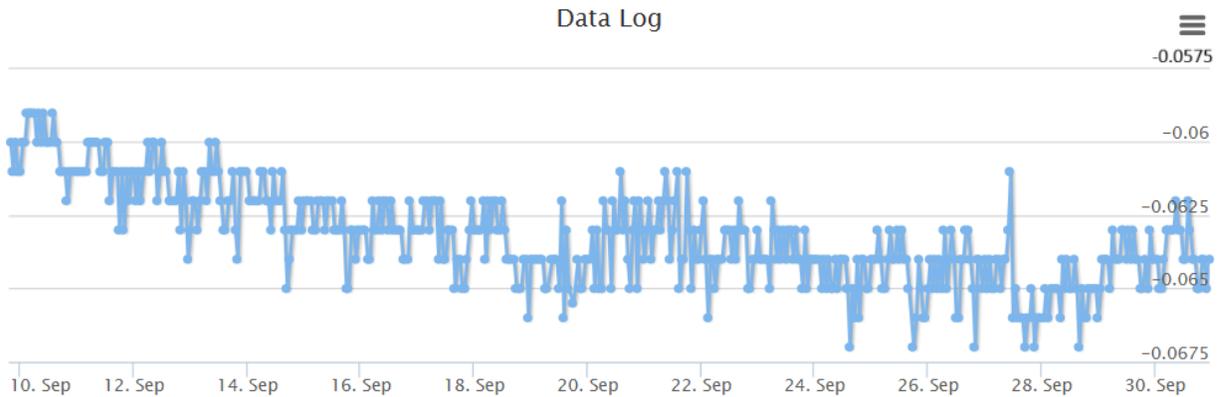


Photo 2: Replacement AMG Force Fan installed on the attached garage.

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

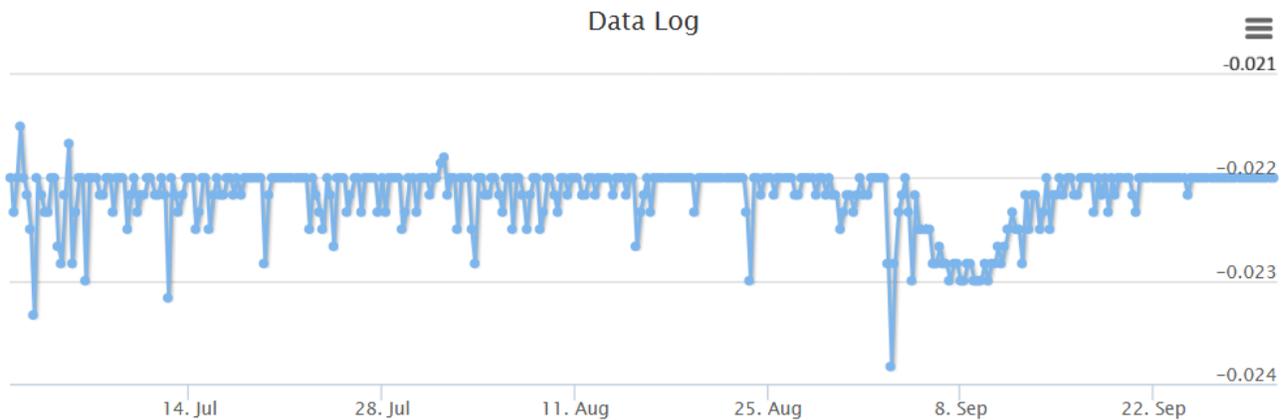


Below is a zoomed in portion of the data plot showing the IPM system continuing to maintain vacuum level at the monitoring point which is typical of normal operation at this property.

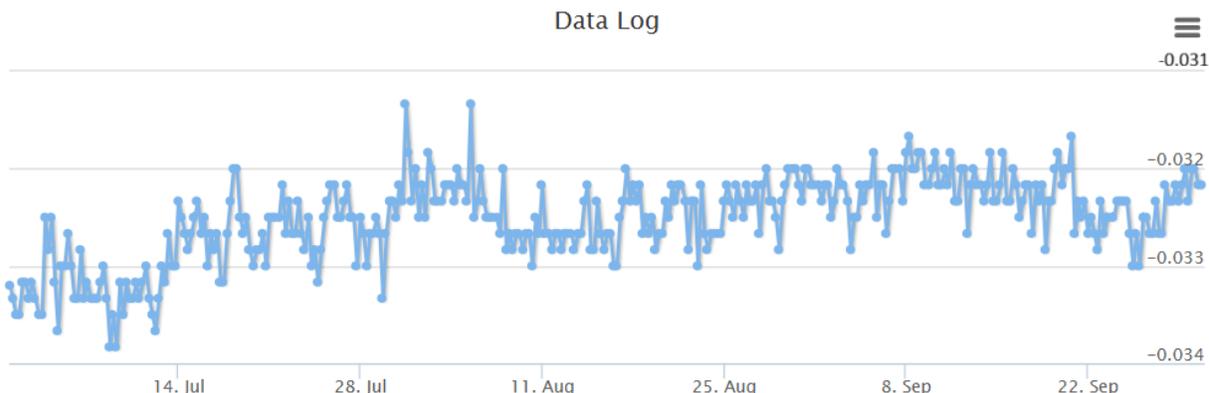


Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. The third quarter 2025 groundwater sampling result for vinyl chloride was detected at an estimated 0.68 µg/L at MW-115S and did not exceed the historical high of 3.9 µg/L observed in November 2019. The vinyl chloride concentration was detected at an estimated 0.81 µg/L at MW-79SR which did not 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. Therefore, additional sub-slab sampling was not required.

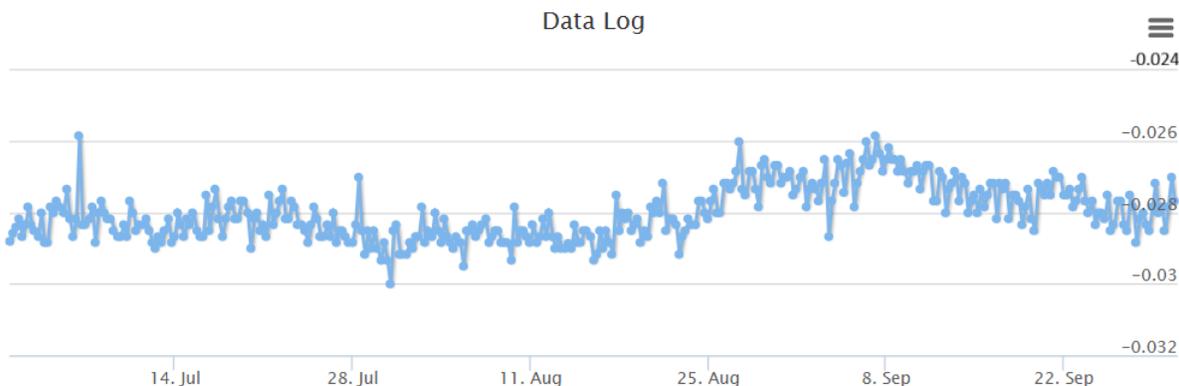
- **12131 Boston Post** – The system is currently in operation and is being maintained and monitored. The update of the data logged by the vacuum transmitter connected to MP-4 is presented below.



- **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. The fifth annual OM&M event was completed on July 31, 2025. All monitoring points achieved the performance metric established by EGLE of -0.02 iwc.
- **12036 Brewster** – The system is currently in operation and is being maintained and monitored. Below is the data plot logged by the vacuum transmitter connected to SSMP-2 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 31, 2025, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and removed approximately 8 gallons of water from near the crawlspace entrance. 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.
- **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 August 4, 2025, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and removed approximately 10 gallons of water from near the crawlspace

entrance. 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 31, 2025, following a rain event that produced more than 1 inch of rain in a 24-hour period, Arcadis inspected the barrier and water was not observed in the crawlspace. 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 fifth annual OM&M event was completed on July 31, 2025. All monitoring points achieved the performance metric established by EGLE of -0.02 iwc.

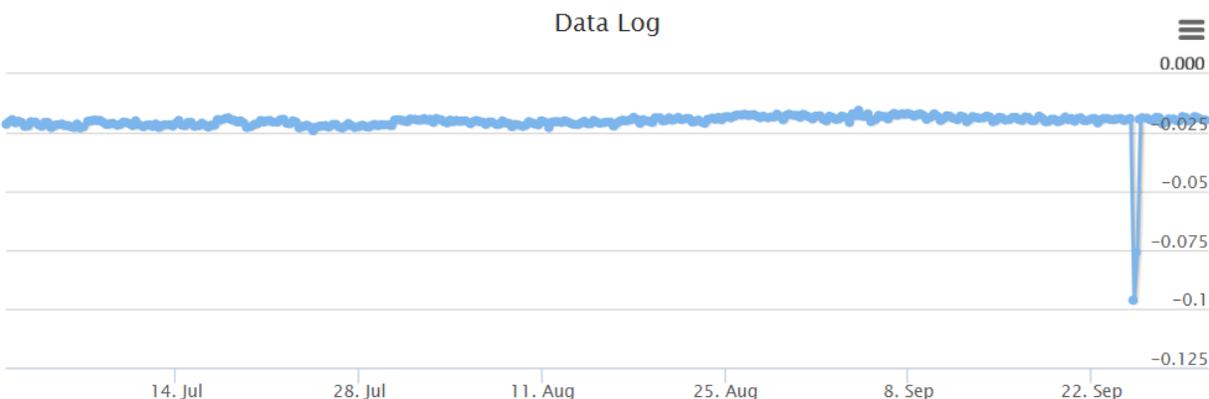
Monitoring in accordance with the EGLE-approved property-specific monitoring program is ongoing. The third quarter 2025 groundwater sampling results for vinyl chloride were non-detect at MW-90S and MW-169S and did not exceed the groundwater screening level of 1.0 µg/L. Vinyl chloride was detected at an estimated concentration of 0.53 µg/L at MW-103S and did not exceed the groundwater screening level of 1.0 µg/L. The vinyl chloride concentration was non-detect at MW-136S and did not exceed the historical high of 3.2 µg/L observed in November 2020. Vinyl chloride was detected at an estimated concentration of 0.75 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.

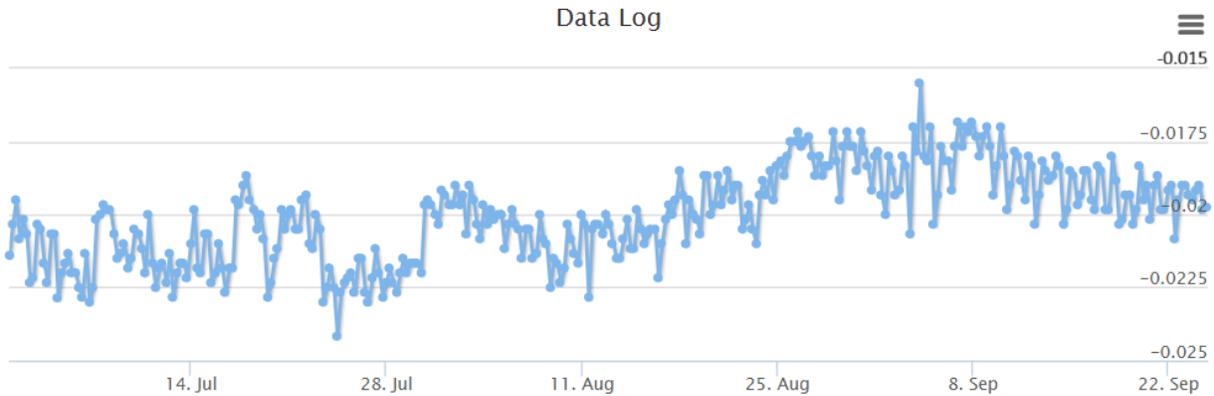
Monitoring in accordance with the EGLE-approved property-specific monitoring program is underway. The third quarter 2025 groundwater sampling results for vinyl chloride were non-detect at MW-108S, MW-168S, and MW-169S and did not exceed the groundwater screening level of 1.0 µg/L. The vinyl chloride 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 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 continuously monitored 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 third quarter 2025 sample which was non-detect.
- **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.