



VAPOR INTRUSION AND GROUNDWATER CONTAMINATION PLUME FORD LIVONIA TRANSMISSION PLANT, LIVONIA

Fact Sheet

Project Overview

The Department of Environmental Quality (DEQ) is providing this fact sheet concerning Ford Motor Company's (Ford) proposed environmental investigation activities at the Livonia Transmission Plant (Plant). The environmental investigation will take place in the geographic area bounded by Levan Road to the west, Plymouth Road to the south, Stark Road to the East, and properties adjacent to the railroad tracks, on the north. The environmental investigation activities are necessary to define the extent of contamination.

Background and Site History

While renovating the Plant, Ford reported the discovery of chlorinated compounds in the groundwater at the Plant. Ford investigated the contamination and determined one of these compounds, vinyl chloride, had migrated east of the plant in groundwater concentrations exceeding DEQ generic residential cleanup criteria for drinking water and Groundwater to Surface Water Interface. All businesses and residents in the surrounding areas receive water from the Great Lakes Water Authority, therefore, there is no known impact to drinking water being supplied to the homes and businesses in the area.

Groundwater in the area is shallow and Ford had installed some monitoring wells prior to 2018 to assess the groundwater quality. Additional monitor wells are required to assess the potential for risk to homes and businesses in the area. Soil gas wells are also required to assess the potential for risk to homes and businesses in the area for vapor intrusion.

In July of 2017 Ford entered into a Consent Decree with the DEQ. The Consent Decree puts Ford on a schedule to conduct remedial activities and allows the DEQ formal oversight of these activities. In December 2017 Ford submitted a Response Activity Plan which DEQ reviewed and disapproved in March 2018 due to deficiencies. In April 2018 Ford proposed two Response Activity Plans to assess potential impacts from the vinyl chloride plume that are currently being reviewed by DEQ.

Response Activity Plan Proposal Summary

The work proposed will consist of:

On-Site:

- Additional evaluation of sub-slab soil gas in portions of the Plant and Automatic Transmission New Product Center that have not previously been sampled.
- On-site source characterization, including potential source area identification and further evaluation of the northwest portion of the Plant.
- A utility corridor analysis to determine if underground utility corridors serve as preferential pathways for contamination to migrate.
- Continued monitoring on-site of existing sampling points.

Off-Site:

- Securing access to off-site properties with residents and business owners.
- Collecting and evaluating building-specific property information, such as building construction details and presence of sump pumps.
- Collection of sub-slab soil vapor in homes and businesses where building construction allows for this method of sampling and collection of indoor air samples.
- Installation of additional monitor wells.
- A utility corridor analysis to determine if underground utility corridors serve as preferential pathways for contamination.
- Continued monitoring off-site of existing sampling points.

Response Activity Plan Proposal Status

The DEQ has reviewed the proposed Response Activities Plans and is proposing they be approved with modifications as described in draft DEQ response letters. The proposed DEQ modifications are primarily modifications of specific investigation details and plan implementation, but notable proposed modifications are:

- Ford will be required to add additional properties to the investigation as analytical data from groundwater, sump water, soil-gas, or indoor air indicates necessary and the investigation will address any future impacted properties in the same manner as the proposed plan.
- Groundwater monitoring wells installed in lieu of sub-slab gas points will be made permanent wells.
- Soil-gas samples not meeting the strict quality control measures as outlined in the DEQ's Vapor Intrusion Guidance Document may not be used as a sole line of evidence to determine or negate the need for mitigation/remedial actions.
- Ford is required to prove their groundwater plume model. This shall be done with the installation of additional groundwater monitoring wells between the point in the aquifer where the plume has been delineated to less than the analytical method target detection limit, and the edge of the 100' lateral inclusion zone, with appropriate well screen depths.
- Abandonment of any impacted off-site residential and irrigation wells. Ford shall notify the DEQ and City of Livonia if wells are discovered and obtain permission for subsequent abandonment, with work to be completed within 30 days of discovery.

Schedule

The schedule proposed by Ford requires Ford to initially seek access agreements from residents within 1 week after plan approval. Once access is granted by property owners, Ford will work with property owners or tenants to install sampling points and collect initial samples within 2 weeks of property access approval. Once samples have been collected, Ford will receive lab results within 10 business days and submit the next steps to the DEQ within 30 days of receiving results.

If the results indicate a risk is present, Ford is required to prepare and implement a mitigation plan. If the results do not indicate a risk is present, additional sampling will be required, quarterly at a minimum, until trends in data can be established and risks assessed. The number of samples required will be based a number of data-driven factors, including results of samples from nearby structures and data from sampling events.

Role of the DEQ During Ford's Investigation Activities

The DEQ's role during the cleanup activities will include the following:

- Present the proposed Remedial Action Plans to the public and collect public comments to be incorporated into the final Remedial Action Plans by Ford;
- Review and approve the proposed Response Activity Plans if they are determined to meet the requirements of the Consent Decree;
- Review field work to ensure sampling is conducted in accordance with acceptable methods and evaluate lab data to ensure validity of results;
- Upon completion of the proposed work in the Response Activity Plans, DEQ shall require Ford to follow the appropriate next steps from the Consent Decree. The next steps will be determined based on an analysis of all data collected to date;
- Require that Ford maintains a public outreach effort, communicating investigation results as they are received and remaining available to answer questions related to the results;
- Work with other public bodies, such as Michigan Department of Health and Human Services, Wayne County Department of Health, Veterans & Community Wellness, Michigan Attorney General, Michigan Senate, and the City of Livonia – so that all entities remain informed and aware of ongoing activities related to the contamination and groundwater plume.

Where to Find Additional Information

Ford maintains a website for access to all data and submissions at: www.fordlivoniabostonbeaconproject.com; Ford may also be reached by telephone at 844-511-1002; or by email at info@fordlivoniabostonbeaconproject.com.

It should be noted that the DEQ does not review or approve the content of Ford's website narrative

The DEQ has also established a project website at www.michigan.gov/LivoniaVI.

DEQ Contact

To reach a DEQ representative, please contact the Environmental Assistance Center by phone at 800-662-9278, or by email at DEQ-RRD-Ford-Livonia@michigan.gov.

Michigan's Environmental Justice Policy promotes the fair, non-discriminatory treatment and meaningful involvement of Michigan's residents regarding the development, implementation, and enforcement of environmental laws, regulations, and policies by this state. Fair, non-discriminatory treatment intends that no group of people, including racial, ethnic, or low-income populations, will bear a disproportionately greater burden resulting from environmental laws, regulations, policies, and decision-making. Meaningful involvement of residents ensures an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health.