



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 8, 2021

VIA E-MAIL AND CERTIFIED MAIL – 7020 0090 0002 2549 9159
RETURN RECEIPT REQUESTED

Ford Motor Company
Attention: Mr. Todd M. Walton
Fairlane Plaza North
290 Town Center Drive, Suite 800
Dearborn, Michigan 48126

Dear Mr. Walton:

SUBJECT: DEMAND FOR INITIAL RESPONSE ACTIONS UNDER PART 213
Ford Motor Company, Flat Rock Assembly Plant
1 International Drive, Flat Rock, Wayne County, Michigan
Facility ID Number 00021089, Confirmed Release # REL-0186-21

The Department of Environment, Great Lakes, and Energy (EGLE) is sending this Demand for Initial Response Action pursuant to the requirements of Part 213, Leaking Underground Storage Tanks, of the Natural Resources and Environmental Protection Act, 1994 PA 415, as amended (Part 213), for the release(s) from the regulated underground storage tank (UST) system(s) at the above-subject Site. On August 31, 2021, EGLE received a Pollution Emergency Alerting System (PEAS) notification of a petroleum odor emanating from the lift station, located at 30501 Olmstead, Flat Rock, Wayne County, Michigan. As the Owner/Operator (O/O), who is liable under Part 213, Ford has statutory obligations to undertake corrective actions and meet the reporting requirements under Part 213.

Section 21307 of Part 213 requires that upon confirmation of a release from an underground storage tank system, the owner or operator that is liable under Section 21323a shall report the release to EGLE within 24 hours after discovery. It is EGLE's understanding that Ford reported a confirmed release (REL-0186-21) to the Department of Licensing and Regulatory Affairs on September 2, 2021. While EGLE and other governmental entities have initially responded to and may continue to investigate this release, these actions do not relieve Ford from any responsibilities related to the release. In addition to initial response actions required under Section 21307 of Part 213, due to the imminent threat to human health and the environment, Ford is responsible for **immediate and expeditious performance of the following initial response actions:**

1. Identify and mitigate immediate fire, explosion hazards, and acute vapor hazards. This includes any impacts caused by migration of gasoline or gasoline vapors through the sanitary and or storm sewer systems.
2. Take action to prevent further release of the regulated substance into the environment, including removing the regulated substance from the UST that is causing the release. Investigate the condition of all UST systems, ancillary piping, and the surrounding subsurface conditions (i.e., soils and groundwater). Determine how gasoline is entering the sanitary and or storm sewers located on the Flat Rock Assembly Plant property.
3. Regarding non-aqueous phase liquids (NAPL), take steps necessary and feasible to address unacceptable immediate risks.
4. Excavate and contain, treat, or dispose of soils above the water table that are visibly contaminated with a regulated substance if the contamination is likely to cause a fire hazard or pose an immediate threat to groundwater, surface water, or any other potential pathways including but not limited to the volatilization to indoor air pathway.
5. Take any other action necessary to abate an immediate threat to public health, safety, welfare, or the environment, including but not limited to:
 - a. Visually inspecting the areas of any aboveground release or exposed areas of belowground releases and prevent further migration of the released substances into surrounding soils, groundwater, or surface water.
 - b. Monitoring and mitigate any additional immediate fire and safety hazards posed by vapors or NAPL that have migrated from the UST system and piping area and have entered subsurface structures, including storm and sanitary sewers, basements, crawl spaces, etc.
6. Submit to EGLE daily progress reports on corrective actions taken until EGLE has determined that obligations under Section 21307 or Part 213 have been met. Progress reports should be sent to Joe DeGrazia, EGLE, Warren District Office, 27700 Donald Court, Warren, MI 48092.

Ford shall also complete and submit to EGLE an Initial Assessment Report (IAR) and Final Assessment Report (FAR) in accordance with the requirements of Sections 21308a and 21311a of Part 213. The FAR shall also include a Corrective Action Plan (CAP) that meets the requirements of Section 21309a of Part 213.

EGLE requests Ford to submit to this office within three (3) days of receipt of this letter, a written commitment to conduct the necessary initial response actions. Ford's written

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commitment shall include a schedule for conducting the necessary additional corrective actions due to the imminent threat to human health and the environment.

EGLE will consider Ford to be out of compliance with the corrective action requirements of Part 213 if Ford does not complete above-described actions and submit the appropriate information requested by EGLE. Ford's failure to comply with the reporting and corrective action requirements of Part 213 may subject Ford to the assessment of administrative penalties, red-tagging of non-compliant UST systems, issuance of an Administrative Order, and/or referral to the Department of Attorney General for injunctive relief including the assessment of civil fines.

If you have questions regarding this letter, you may contact Joseph DeGrazia, Incident Management Specialist, at 586-291-0476 or via email at DeGraziaJ@Michigan.gov; or you can contact me.

Regards,



Paul Owens, District Supervisor
Warren District Office
Remediation and Redevelopment Division
OwensP@Michigan.gov

cc: Ms. Katie, Holcomb, Ford Motor Company
Mr. TJ Richardson, LARA
Mr. Aaron Keatley, EGLE
Mr. Jay Eickholt, EGLE
Mr. Joshua Mosher, EGLE
Ms. Mary Miller, EGLE
Mr. Dan Yordanich, EGLE
Mr. Darren Bowling, EGLE
Ms. Vicki Katko, EGLE
Ms. Melinda Steffler, EGLE
Mr. Joseph DeGrazia, EGLE
Mr. Eric Larson, EGLE
Ms. Krista Reed, EGLE