

Second Modification of the
Administrative Order for Response Activity
Former Kelsey-Hayes Company
101 Oak Street, Milford, Oakland County, Michigan
EGLE Docket No. AO-RRD-22-001

WHEREAS, DWEHD has not yet issued the Act 399 construction permit; and

WHEREAS, EGLE reviewed the November 14, 2022, Updated Technical Summary Report, submitted by Respondent, which concluded that the unique construction of monitoring well OW-16D2, consisting of galvanized steel in both the casing and the screen, caused fouling, and created isolated conditions conducive to the presence of in-well vinyl chloride; and

WHEREAS, EGLE reviewed the groundwater analytical field parameters from June 2022 through February 2023, submitted to EGLE by Respondent on February 14, 2023, and determined the drawdown and other parameters to be supportive of the conclusions of the November 14, 2022, Updated Technical Summary Report; and

WHEREAS, monitoring well OW-16D2 has therefore been determined to no longer be an effective monitoring well due to its unique construction, and associated tendency to foul; and

WHEREAS, Respondent has installed monitoring wells OW-16D2R1 and OW-16D2R2, intended to replace monitoring well OW-16D2; and

WHEREAS, the EGLE RRD Director is authorized to modify any required response activities pursuant to Section XIII of the Administrative Order for Response Activity, AO-RRD-22-001 (Order).

NOW, THEREFORE, in consideration of Respondents findings and EGLE's review, the following modifications to the Order shall take effect upon the date of the EGLE RRD Director's signature:

Paragraphs 5.2 and 5.3 of the Order are modified as follows:

5.2 Installation of Air Stripper. Pursuant to the schedule below, Respondent shall diligently provide for and fully cooperate with the Village of Milford to design, install, implement, and maintain and operate the packed tower air stripper consistent with the Scope of Work. All work shall be conducted in accordance with the requirements of this Order.

5.3 Increase monitoring well sampling frequency. Beginning 15 days after the effective date of this Second Modification to the Order, and continuing monthly until this Order is terminated, Respondent shall sample monitoring wells OW-16D2R1 and OW-16D2R2. Collected samples shall be analyzed for VOCs with results reported to EGLE in the progress reports pursuant to Section XII. Within 30 days of the effective date of this Second Modification to the Order, Respondent shall remove monitoring well OW-16D2 from the ground, in accordance with the American Society for Testing and Materials Standard ASTM D5299/D5299M-18, and provide to EGLE written and photographed documentation of the steps that were taken to remove the monitoring well and the condition of the monitoring well (whether fouling is present, the extent of fouling, the condition of the casing, and any other notable concerns).

All other aspects of the Order as originally issued on March 16, 2022, and as modified September 16, 2022, remain in full force and effect.

This modification became effective on April 20, 2023.



Mike Neller, Director
Remediation and Redevelopment Division
Michigan Department of Environment, Great Lakes,
and Energy

April 20, 2023

Date

Approved as to form:

Danielle Allison-Yokom

Danielle Allison-Yokom
Assistant Attorney General
Environment, Natural Resources, and Agriculture Division
Michigan Department of Attorney General

April 20, 2023

Date