

Third 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, on April 20, 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE) issued the Second Modification of the Administrative Order for Response Activity, AO-RRD-22-001 (Order), that required Respondent to remove monitoring well OW-16D2 from the ground and provide documentation of the conditions of OW-16D2 to EGLE by May 20, 2023; and

WHEREAS, on May 8, 2023, Respondent provided a Work Plan to EGLE for the removal of OW-16D2 from the ground; and

WHEREAS, within the Work Plan, Respondent's Consultant indicated several complicating factors associated with the removal of OW-16D2 including its age and materials, site access, and the availability of the drilling company subcontractor that is to perform the removal; and

WHEREAS, within the Work Plan, Respondent requested a twenty (20) day extension for the requirement to remove and document the conditions of monitoring well OW-16D2; and

WHEREAS, the EGLE Remediation and Redevelopment Division (RRD) Director is authorized to modify any required response activities pursuant to Section XIII of the Order;

NOW, THEREFORE, in consideration of the complicating factors associated with the removal of OW-16D2, the following modification to the Order shall take effect upon the date of the EGLE RRD Director's signature:

Paragraph 5.3 of the Order is modified as follows:

**5.3 Increase monitoring well sampling frequency.** Beginning fifteen (15) days after the effective date of the 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. No later than June 19, 2023, 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 on September 16, 2022, and April 20, 2023, remain in full force and effect.

This modification became effective on May 19, 2023.



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

May 19, 2023

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Date

Approved as to form:

*/s/ Danielle Allison-Yokom*

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

May 19, 2023

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Date