



**Environmental Quality Office
Sustainability, Environment & Safety Engineering**

**Ford Motor Company
Fairlane Plaza North
290 Town Center Drive, Suite 800
Dearborn, MI 48126**

September 10, 2021

Mr. Paul Owens
District Supervisor
Department of Environment, Great Lakes, and Energy
Warren District Office
Remediation and Redevelopment Division
27700 Donald Court
Warren, Michigan 48092
owensp@michigan.gov
VIA E-MAIL

Re: Ford Motor Company, Flat Rock Assembly Plant
1 International Drive, Flat Rock, Wayne County, Michigan
Facility ID Number 00021089, Confirmed Release # REL-0186-21
Commitment to Conduct Necessary Initial Response Actions

Dear Mr. Owens:

Introduction

Ford Motor Company (Ford) has prepared this letter in response to your “DEMAND FOR INITIAL RESPONSE ACTIONS UNDER PART 213” dated September 8, 2021 (Demand Letter). The Demand Letter requests that Ford submit to EGLE within three days of receipt of this letter, a written commitment to conduct the necessary initial response actions. As you know, the response actions described below are a part of a larger response that Ford is undertaking in the Flat Rock community in coordination with the Flat Rock Unified Incident Command, which includes U.S. EPA, EGLE, the City of Flat Rock, emergency responders, and other agencies. This response focuses primarily on Ford’s actions relative to Part 213 requirements and the UST system that was discovered leaking on September 1 and is not a comprehensive documentation of all of Ford’s many activities, including in the community.

This letter serves as the commitment to conduct the necessary initial response actions and provides the requested schedule for conducting the necessary additional corrective actions.

Initial Response Actions Completed

Ford began implementing the initial response actions in an expeditious manner immediately upon discovery of the release from a gasoline fuel pipe connected to Tank 1. A list of the primary initial response actions completed or initiated (ongoing actions) are listed below:

- Shut down gasoline UST system and emptied Tank 1.
- Completed UST system tightness and integrity tests on USTs.

- Inspected subsurface structures/utilities/indoor air of FRAP facility for presence of gasoline or gasoline vapors.
- Utilized a vacuum truck to remove gasoline that had collected in the gasoline piping vault/transition sump where the release was discovered, from the adjacent oil water separator and storm sewer catch basins.
- Pressure jetted select sections of the sanitary sewer on-site.
- Performed camera/video inspections of select sections of the sanitary sewers on-site.
- Completed soil borings in and immediately adjacent to the fill material in the immediate vicinity of where the release was discovered and along the fuel piping trench.
- Installed a temporary well in the fill material where gasoline free phase product was encountered.

Off-Site Initial Response Actions

- Daily meetings with Unified Incident Command.
- Daily written progress reports to Unified Incident Command.
- Plugged the sanitary sewer where it leaves Ford property to prevent any potential off-site migration of gasoline or gasoline vapors via the sanitary sewer.
- Provided Unified Incident Command with around the clock (24/7) monitoring of off-site sewers and buildings.
- Pressure jetted select sanitary sewers off-site to reduce gasoline vapors in the sanitary sewer system.

Schedule for Conducting the Necessary Additional Corrective Actions

The Demand Letter stated that Ford shall include a schedule for conducting the necessary additional corrective actions. The corrective actions that will be completed will be based on the findings of ongoing investigations and will be an iterative process. A list of planned or ongoing initial response actions or corrective actions as described below. Additionally, as required by the Demand Letter, Ford will submit daily progress reports via email to EGLE RDD, in addition to the daily reports Ford provides to Unified Incident Command.

September 10, 2021 through September 19, 2021:

- Smoke test and if necessary, dye study of storm and sanitary sewers. The purpose of these studies is to assess whether there are any locations onsite where stormwater or spills are or were entering the sanitary sewer and could possibly leave the site via sanitary sewer.
- Excavation of impacted soil/fill material and removal of any gasoline encountered in the excavation(s).

- If deemed appropriate, performance of a soil gas investigation throughout the area where the release was discovered and throughout the UST system area including utility corridors. Investigation results will help direct investigative efforts to identified hot spots. Additionally, the investigation will be an initial and assess potential vapor intrusion.
- Completion of soil borings and installation of monitoring wells/recovery wells within utility corridors.
- Continue to perform monitoring of VOC vapors in sewers.
- Completion and submittal of daily progress reports to EGLE. Daily progress reports will be submitted to Joe DeGrazia by electronic mail.

Off-Site Initial Response Actions

- 24-hour participation with Unified Incident Command.
- Keep the sanitary sewer in the area adjacent to the gasoline release plugged to prevent any potential off-site migration of gasoline or gasoline vapors via the sanitary sewer until necessary onsite responses are complete.
- Assist Unified Incident Command with around the clock (24/7) monitoring of off-site sewers and buildings.
- Daily written progress reports to Unified Incident Command.

Closing

Depending on the results of the initial response actions completed during the week ending September 19, 2021, Ford will complete appropriate corrective actions and initial assessment activities in compliance with Part 213. Ford will continue to communicate with EGLE on a daily basis (progress reports at a minimum). The communications will address schedules and activities being completed to comply with Part 213.

This letter serves as the commitment to conduct the necessary initial response actions and provides the requested schedule for conducting the necessary additional corrective actions.

If you have any questions, please feel free to contact me at glogan@ford.com.

Sincerely,

/s/

Glen Logan, Manager
North America Environmental Compliance

Paul Owens, MDEQ

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cc: Ms. Lisa Hansen, Ford
Mr. Todd Walton, Ford
Ms. Katie Ernst, Ford
Mr. Thomas Kinney, GHD
Mr. Nathan Kuhl, GHD
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