GRETCHEN WHITMER
GOVERNOR

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

IESL EICHLER CLARK
OR

May 4, 2022

Scott Detwiler
ZF Active Safety US Inc.
11202 East Germann Road
Mesa, Arizona 85212

Dear Scott Detwiler:

SUBJECT: EGLE Response to ZF Active Safety US Inc. (ZF's) Work Plan Related to Monitoring Well Rehabilitation and Vertical Aquifer Profiling Regarding Former Kelsey-Hayes Company, 101 Oak Street, Milford, Oakland County, Michigan, Facility ID No. 63000952.

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Remediation and Redevelopment Division (RRD) has received your letter on April 22, 2022, providing EGLE with ZF's Work Plan to rehabilitate monitoring well OW-16D2 and installation of three vertical aquifer profiling (VAP) borings.

The RRD has reviewed the Work Plan and has the following recommendations, questions, and concerns:

- The plan calls for a down-well camera survey before rehab activities are preformed but does not require a similar survey at other points such as after cleaning with a nylon brush or after the application of Aqua-Clear PFD. Comparison of the original survey to later surveys would be useful to inform next steps as well as revealing improvements in condition of the well or conditions which were not previously observable and could be a concern.
- Can any additional information be provided regarding what conditions from the well camera survey and chemical/biological results will trigger the use of Aqua-Clear PFD?
- Regarding the process for Aqua-Clear PFD:
    - The work plan states that following introduction of the solution the well will sit for 4 hours. However, the manufacturer recommendation is that the well should be agitated every 2 hours. Why is there a deviation from the manufacturer's recommendations?
    - Will the water level in the well be monitored during this work?
    - If there is insufficient recharge of the well, what measures will be taken to remove and rinse the solution out of the well/gravel pack/formation?
    - Has the manufacturer been contacted regarding potential reactions with vinyl chloride, cis-1,2-DCE, or other chlorinated and PFAS compounds?
- The zone of 'highest contamination" was not defined in EGLE's previous communication with ZF. The zone of "highest contamination" is defined by EGLE as the zone of the highest detected vinyl chloride, or if no vinyl chloride is detected, as the zone with the highest total volatile organic compounds (VOCs). In a scenario where the highest vinyl

chloride detected is in a different zone than highest total VOCs, ZF should meet with EGLE to discuss the placement of the well screen(s).

- The stated maximum depth of VAP borings is 130-feet below grade or to the surface of the clay underlying the aquifer. The VAP borings should be advanced 5 feet into the clay that is encountered at the bottom of the aquifer.
- Slug tests, using a bailer methodology, are to be completed on OW-16D2. A pneumatic displacement method for this well would provide a greater displacement of water in OW-16D2 and therefore improved results. Use of a pneumatic slug test method is recommended.
- What is the reasoning for not collecting VOC samples during the chemical and biological analysis of monitoring well OW-16D2?
- Testing of two water samples mentions microscopic evaluations. What specific microscopic evaluations are to be completed?
- Testing is also being completed for total and E. coli coliform bacterial analysis. The monitoring well is not being disinfected, is bacterial analyses appropriate for OW-16D2?
- What is the reason the VAP drilling is not occurring until June?

If you have any questions regarding this matter, please contact me.

Sincerely,

Kevin Wojciechowski,
Senior Environmental Quality Analyst
Warren District Office
Remediation and Redevelopment Division
586-623-2948
WojciechowskiK@Michigan.gov

cc: Christian Wuerth, Village of Milford
John McInnis, Arcadis
Joost Vant Erve, DHHS
Paul Owens, EGLE
Cheryl Wilson, EGLE
Darren Bowling, EGLE
Lyndsey Hagy, EGLE
Katie Noetzel, EGLE
Tiffany Yusko-Kotimko, EGLE