



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

April 14, 2022

VIA E-MAIL

Robert Bleazard
Sr. EHS Manager Environmental Remediation
ZF Health, Safety, and Environment
ZF Active Safety US Inc.
12001 Tech Center Drive
Livonia, Michigan 48150-2122

SUBJECT: Response to ZF Active Safety US Inc. Additional Information for Consideration Related to Administrative Order for Response Activity; EGLE Docket No. AO-RRD-22-001 (AO)

Dear Robert Bleazard:

The Department of Environment, Great Lakes, and Energy (EGLE) has received ZF Active Safety US Inc. (ZF) correspondence dated April 8, 2022, and April 13, 2022, containing technical information for EGLE's consideration pertaining to the potentially anomalous groundwater parameters in monitoring well OW-16D2 during sampling.

Although EGLE agrees that the information presented by ZF warrants additional investigation by ZF, EGLE does not believe the information presented thus far demonstrates that there is no imminent and substantial endangerment to the public drinking water supply for the Village of Milford. Therefore, EGLE cannot grant ZF's requested extension of the AO response deadline, and EGLE expects ZF's timely compliance with the AO.

If ZF intends to submit a work plan to undertake a parallel path to further investigate concerns regarding the integrity of OW-16D2, EGLE does not discourage those efforts, however the work plan should provide for the following:

- Continue to rehabilitate monitoring well OW-16D2 with mechanical and/or additive techniques. Collect post-rehabilitation groundwater samples for a sufficient period of time to demonstrate the samples are representative of aquifer conditions.
- Complete vertical aquifer profiling in close proximity to OW-16D2 to verify the screen is in the zone of highest contamination. Based on the completed vertical aquifer profile, if the depth of contamination differs from the screening interval of OW-16D2, install a new monitoring well to be screened at the depth of the highest level of contamination.

- Install a new monitoring well to replace OW-16D2 if it cannot be rehabilitated. The new monitoring well shall be screened based on the conclusions from the vertical aquifer profiling.

EGLE remains open to reconsider its position regarding the Administrative Order if additional data demonstrates that there is not an imminent and substantial risk to the Village of Milford's drinking water wells.

If you have questions regarding this matter, please contact Kevin Wojciechowski, Project Manager, at 586-623-2948 or WojciechowskiK@Michigan.gov; or you may contact me.

Sincerely,



Mike Neller, Director
Remediation & Redevelopment Division
517-512-5859

cc: Danielle Allison-Yokom, Michigan Department of Attorney General
Aaron B. Keatley, Chief Deputy Director, EGLE
Joshua Mosher, EGLE
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