



ZF Active Safety US Inc.
12001 Tech Center Drive, Livonia, Michigan 48150-2122

VIA EMAIL: WojciechowskiK@Michigan.gov
AND CERTIFIED MAIL

Department	Health Safety and Environmental
From	Scott Detwiler
Phone	+1 480 722-4139
Email	Scott.Detwiler@zf.com
Date	November 23, 2021

Mr. Kevin Wojciechowski, Project Manager
Warren District Office -Remediation and Redevelopment Division
Michigan Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, Michigan 48092

RE: ZF Active Safety US Inc. Response to Michigan Department of Environment, Great Lakes, and Energy Compliance Communications Regarding the Facility Located at 101 Oak Street, Milford, Michigan.
EGLE Facility ID No. 63000952

Dear Mr. Wojciechowski:

This letter and the accompanying Response Activity Plan (ResAP) include ZF Active Safety US Inc.'s (ZF's) response to Compliance Communication letters from the Michigan Department of Environment, Great Lakes, and Energy (EGLE), dated September 1, 2021; received by ZF on September 13th (the September 2021 Letter) and dated October 25, 2021; received by ZF on November 9th (the October 2021 Letter). The two Letters state that they are related to the former Kelsey-Hayes property located at 101 Oak Street, Milford, Michigan (the "Facility" or the "Property") for which ZF retains some clean-up responsibility. However, ZF is no longer the owner of the Property.

The primary issue presented by EGLE in both of the Letters is related to groundwater sampling data collected by ZF from an Observation Well (OW-16D2) that exceeded the Part 201 generic drinking water criterion for vinyl chloride. Observation Well OW-16D2 is less than 200 feet from Village of Milford (Milford's) drinking water wells.

The September 2021 Letter requests that ZF submit a ResAP with a schedule, that when implemented, will achieve the cleanup criteria or protect from exposure to the contamination; to demonstrate compliance with Part 201 by 90 days. ZF and its consultant, Arcadis, were in the process of preparing the ResAP within the requested time period, when the October 2021 Letter was received by ZF. The October 2021 Letter requests that ZF initiate the interim response measure of installing treatment on the Milford drinking water system within 14 days of receipt of the October 2021 Letter. Given the two parallel requests from EGLE and the fact that ZF was already in the process of responding to the September 2021 Letter when it received the October 2021 Letter, this response addresses the issues raised in both of the EGLE Letters. The information presented below describes the response activities that ZF has taken at the Facility, including the information provided in the attached ResAP requested by EGLE.

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In addition, the information below provides ZF's response to EGLE's request to initiate the interim response measure of installing treatment on the Milford drinking water system.

I. September 2021 Letter and EGLE Request for a ResAP:

As noted above, the September 2021 Letter discusses the presence of vinyl chloride above the Part 201 drinking water criterion in Observation Well OW-16D2, and includes EGLE's request that ZF submit a ResAP with a schedule, that when implemented, will achieve the cleanup criteria or protect from exposure to the contamination. The following response actions have been completed or are ongoing with respect to the Property:

a. Immediately taking measures to contain or remove the contamination source

Numerous response actions have been implemented to address chlorinated volatile organic compound (CVOc) impacts at the Facility and include excavation and removal of impacted soil, installation and operation of a soil vapor extraction (SVE) system, and installation and operation of a groundwater extraction and treatment system (groundwater treatment system). Details of these interim response measures were reported to EGLE in the *Summary of Environmental Response Activities* (Haley and Aldrich of Michigan, LLC 2002) and *Remedial Action Plan* (Arcadis 2009). The combination of these interim responses and the continued operation and performance monitoring of the groundwater treatment system, combined with appropriate land-use restrictions, render relevant exposure pathways incomplete, thereby preventing potential threats to public health, safety, or welfare and to the environment.

b. Immediately identifying and eliminating any threat of fire or explosion or direct contact hazards

There are no threats of fire or explosion, or direct contact hazards associated with the detection of CVOcs at any observation wells sampled as part of the ongoing groundwater monitoring at the Facility. Concentrations of CVOcs detected are several orders of magnitude below the flammability and explosivity screening levels for groundwater. In addition, CVOcs detected in groundwater at Observation Well OW-16D2 are approximately 95 feet below grade. Groundwater concentrations observed at OW-16D2 do not exceed the generic drinking water criteria (except for vinyl chloride which was reported at concentrations of 3.5 and 3.0 ug/L during two sampling events on May 13 and August 3, 2021, and has not been above the drinking water criteria in the last six sampling events since August 3rd) and therefore do not pose unacceptable risks due to direct contact with groundwater. Continued groundwater sampling at this well from August 16 to October 25, 2021 did not indicate the presence of vinyl chloride or any other CVOcs above the generic drinking water criteria.

c. Notifying EGLE and affected neighbors if contamination has migrated off the property

Impacted parties affected by the migration of property-related impacts from beyond the Facility boundaries have been notified of such migration in accordance with Rule 522(4). Documentation of the notices were reported in the *Remedial Action Plan* (Arcadis January 2009). For properties located along the east side of Cabinet Street between Commerce and Liberty Streets, documentation was provided in *Final Notice of Migration Letters* (Arcadis January 2011). EGLE was previously provided copies of the notices in accordance with the Part 201 notification requirements.

d. Delineating the extent of contamination

The nature and extent of soil and groundwater CVOC impacts related to the former Kelsey-Hayes Property have previously been delineated.

Documentation of the soil delineation is presented in the *Supplemental Soil Delineation Report*, which is Appendix A of the *Remedial Action Plan* (Arcadis January 2009), the *Technical Memorandum Regarding the Remedial Action Plan* (Arcadis January 2010), and the *2010 Site Investigation Activities and Current Site Conditions Report* (Arcadis March 2011).

Groundwater has been investigated at the Property since 1991 through several phases of investigation. A summary of historical groundwater investigations from 1991 to 2001 is presented in the *Summary of Environmental Response Activities* (Haley & Aldrich of Michigan, Inc. 2002) provided to EGLE (formerly MDEQ) on July 24, 2002. Since 2001, additional vertical aquifer profile (VAP) observation well installation and groundwater monitoring events have been performed to further define and verify the extent of groundwater impacts associated with the Facility. This work is documented in the *Groundwater Investigation Summary Report*, which is Appendix D of the *Remedial Action Plan* (Arcadis January 2009), the *Technical Memorandum Regarding the Remedial Action Plan* (Arcadis January 2010), the *June 2010 Investigation at the Intersection of Cabinet and Liberty Streets* (Arcadis August 2010), the *2010 Site Investigation Activities and Current Site Conditions Report* (Arcadis March 2011), and *Interim Groundwater Response Action Activities Summary Reports* (Arcadis 2002-2021), all of which were previously provided to EGLE. The current extent of groundwater impacts above the drinking water criteria and the layout of the groundwater treatment system and groundwater observation wells are presented on **Figure 1**.

Specific to the Milford municipal well field, groundwater impacts associated with the Site have not been detected south of Liberty Street at concentrations above the generic drinking water criteria, and concentrations trends within the ZF monitoring network are indicative of stable/decreasing trends and an absence of vinyl chloride. The conceptual site model (CSM) informed by multiple lines of evidence indicates a stable plume that is being effectively remediated by ongoing pumping and is therefore not a risk to impact the municipal wells. In addition, as presented in the *Groundwater Flow Model Update and Hydraulic Capture Evaluation* (Arcadis August 2014), and presented on **Figure 1**, OW-16D2 and the municipal wells are not within the flow path of groundwater emanating from the Facility.

e. Undertaking the cleanup of contamination

As indicated above, numerous response actions have been implemented to address CVOC impacts at the Site and include excavation and removal of impacted soil, installation and operation of a SVE system, and installation and operation, and later enhancement of a groundwater treatment system. The treatment system enhancement work is documented in the *Groundwater Treatment System Optimization Work Plan* (Arcadis August 2011).

As presented in the *Remedial Action Plan* (Arcadis January 2009) all sources of CVOCs (tanks, drums, other containers, and secondary containment structures, as well as grossly impacted soils and foundation materials) have been physically removed from the Site as part of the building decommissioning and demolition, subsequent "hot spot" excavations of impacted subsurface soils have been conducted, and a SVE interim response has been implemented.

Current and historical groundwater monitoring data indicate that the current groundwater treatment system, which has been in operation since 1999, is effectively intercepting impacted groundwater associated with the Site and mitigating further migration of Property-related groundwater impacts above the drinking water criteria. In addition, as presented in the *Groundwater Flow Model Update and Hydraulic Capture Evaluation* (Arcadis August 2014) the Property groundwater treatment system extraction wells are providing adequate hydraulic capture of the Property-related CVOC plume.

f. Observation Well OW-16D2 Sampling

As presented above and demonstrated in the *Groundwater Flow Model Update and Hydraulic Capture Evaluation* (Arcadis August 2014), it's our position that OW-16D2 is not within the flow path of groundwater emanating from the Property. However, at the request of EGLE, ZF, recognizing that Observation Well OW-16D2 was included in the expansive and conservative well network originally developed by ZF, Arcadis/ZF submitted a sampling plan for OW-16D2 to EGLE on August 3, 2021 and October 7, 2021 via email, which was approved by you on October 13, 2021 via email (**see Attachment 1**). Pursuant to this plan, ZF sampled OW-16D2 bi-weekly until October 25, 2021. The concentrations of vinyl chloride in the last six sampling events conducted on August 16, September 1, September 13, September 27, October 11, and October 25, 2021 were below the generic drinking water criterion. Therefore, the sampling frequency will be monthly for November 2021, December 2021, and January 2022. If the concentration of vinyl chloride remains at or below the generic drinking water criterion during these three, monthly sampling events, the sampling frequency will return to the semiannual sampling schedule per the groundwater monitoring plan. If the generic drinking water criterion for vinyl chloride is exceeded during any of the remaining sampling events, the sampling frequency will be bi-weekly through January 2022.

g. Due Care

ZF is not the owner of the Property and therefore, is not responsible for complying with the due care provisions under Section 20107a of Part 201 that are applicable to the Property.

II. October 2021 Letter and EGLE Request for Interim Response Measure to Install Treatment:

The October 2021 Letter reiterates that vinyl chloride was detected in OW-16D2 above the generic drinking water criteria and states that, *"the concentration of vinyl chloride found at the Property (i.e. Facility) and the proximity to the Village of Milford municipal well field makes this an imminent and substantial endangerment to public health, safety and welfare, and steps are required to abate that danger in accordance with Section 20119."* The October 2021 Letter then requests that ZF initiate the interim response measure of installing treatment on the Milford drinking water system.

ZF disagrees that there is an imminent and substantial endangerment to public health, safety, and welfare that is being caused by the chlorinated solvent plume from the former Kelsey-Hayes Property. The information presented below, includes historical and current data collected by both ZF and other parties, that supports this conclusion.

The following information previously submitted by ZF to EGLE¹ supports ZF's contention that CVOC's from the former Kelsey-Hayes Property are not an imminent and substantial endangerment to public health, safety and welfare, including:

- Vinyl chloride detections in groundwater at the Property were limited to the former storage pad area (see Figure 1) in investigations conducted between 1999 and 2011, with no vinyl chloride detected recently in any wells monitored by ZF.
- Vinyl chloride previously detected in groundwater wells between 1999 and 2011 within the former storage pad area is located upgradient of and entirely within the capture zones of ZF's active groundwater extraction wells. This groundwater treatment system has been in operation since 1999 and has been providing continuous hydraulic capture of groundwater impacts associated with the Facility.
- ZF has completed delineation of groundwater impacts associated with the Facility. None of the observation wells hydraulically downgradient of the facility at Liberty Street exceed the drinking water criteria.

¹ This information has previously been provided to EGLE in the following reports: 1) *Remedial Action Plan* (Arcadis January 2009); 2) *2010 Site Investigation Activities and Current Site Conditions Report* (Arcadis March 2011).

- ZF has implemented multiple aggressive remedial actions including, source area excavations, soil vapor extraction (SVE), and a groundwater extraction and treatment system at the Facility. These remedies have been executed and completed during the past 25 years and the groundwater extraction and treatment system is continuing.
- ZF expanded the groundwater extraction and treatment system by installing PW-4 to specifically target groundwater impacts that were beyond the hydraulic influence of the Commerce Road ZF extraction wells.
- Results from numeric groundwater modeling completed by Arcadis, and shown on **Figure 1**, clearly shows that the groundwater extraction and treatment system completely captures the impacts from the Facility and shows the location of the ZF plume outside the hydraulic capture of the Milford municipal wells.

ZF has been collecting samples from OW-16D2 since 1998 and vinyl chloride has not been detected above the generic drinking water criteria in any samples collected until recently, in May 2021 and August 2021. The concentrations of vinyl chloride detected at OW-16D2 during the last six sampling events conducted between August 16th and October 25th, 2021 were all below the generic drinking water criteria for vinyl chloride.

Date	Vinyl Chloride (ug/L)	Drinking Water Criteria (ug/L)
May 13	3.5	2.0
June 8	1.2	2.0
August 3	3.0	2.0
August 16	1.8	2.0
September 1	1.7	2.0
September 13	1.6	2.0
September 27	1.8	2.0
October 11	1.4	2.0
October 25	1.5	2.0

Based on a several summaries of the data for the Milford municipal well system that have been provided to ZF and Arcadis, vinyl chloride has never been detected in Milford's municipal wells or associated distribution systems during the last 32 years. Therefore, based on the information that ZF has, it does not appear that there is an imminent and substantial endangerment to public health, safety and welfare and the installation of a treatment system on the Village of Milford drinking water system is not necessary.

In addition, there is no basis to conclude vinyl chloride at the levels detected in OW-16D2 will result in vinyl chloride being detected above drinking water criteria in Milford's municipal wells or its municipal water system.

In sharp contrast to OW-16D2, the Milford municipal wells have screens 20 feet long with an average pumping rate of 470 gallons per minute (gpm) and draw water from a large area, including to the east and south (i.e., the opposite direction of OW-16D2). Because the municipal wells draw groundwater from such a large area, even if vinyl chloride were to migrate from OW-16D2 to the municipal wells (which there is no evidence of) it would not cause an exceedance of the generic drinking water criteria in the municipal water.

Finally, ZF disputes EGLE's assertion that the source of the vinyl chloride found in OW-16D2 is from the former Kelsey-Hayes Property. Observation well OW-16D2 and the Milford municipal wells are not within the flow path of groundwater emanating from the Property. There are multiple other confirmed sources of CVOC contamination near and upgradient of OW-16D2, which include vinyl chloride as a contaminant, and several known CVOC plumes in the Village of Milford. The other known sources include the former Spiral Industries site and the Coe's Cleaners site, discussed further below. See attached **Figure 1**, which shows the known source areas and the municipal well capture zone within the Village of Milford. The Spiral Industries site and the Coe's Cleaner site are upgradient of and directly in the groundwater flow path of OW-16D2 and the Milford municipal wells. Based on the probability that other sites may be the source of the vinyl chloride found in OW-16D2, and the multiple lines of evidence that ZF has that the Property is not the source of vinyl chloride impacts in OW-16D2, ZF contends that there is no conclusive evidence regarding the source of the vinyl chloride in OW-16D2. Therefore, ZF disputes EGLE's presumption that the former Kelsey-Hayes Property is the source.

a. Former Spiral Industries – 140 and 150 West Summit Street

The former Spiral Industries site is located north of the Milford municipal wells. Based on a Baseline Environmental Assessment (BEA) submitted to EGLE in June 2014, concentrations of CVOCs detected at the former Spiral Industries site include, but are not limited to: vinyl chloride (Soil: 709 ug/kg and Groundwater: 280 ug/l), trichloroethene (Soil: 2,620,000 ug/kg and Groundwater: 153 ug/l), and cis-1,2 dichloroethene (Soil: 215,000 ug/kg and Groundwater: 650 ug/l). The concentrations of vinyl chloride at Spiral Industries are more than two times higher than any vinyl chloride concentrations ever detected at the former Kelsey-Hayes Property. Unlike the Property, the former Spiral Industries site is directly upgradient of and within proximity to the Milford municipal well capture zone. EGLE should be aware of this information based on EGLE's acknowledgement of receipt of the BEA.

Furthermore, the BEA for the Spiral Industries site indicates that:

- The property is a "Facility" as defined by Part 201.
- The source, nature and extent of contamination at the property is not fully delineated.
- Soil and groundwater contamination at the site, including with vinyl chloride and other CVOCs, is within the Village of Milford and directly upgradient of the Milford municipal wells.
- To ZF's knowledge this site has not yet implemented response actions and therefore, represents an unmitigated risk to the Village of Milford municipal wells.

b. Former Coe's Cleaners site – West of Main Street just north of Center Street

As for the Coe's Cleaners site, EGLE has also long been aware of and directly overseeing the ongoing investigation and cleanup of CVOCs emanating from this site. The groundwater monitoring wells associated with this site are located immediately upgradient of and within the Milford municipal well capture zone, as determined by the model results and shown on **Figure 1**. The concentrations of tetrachloroethene detected in soil samples collected at the former Coe's Cleaner site during an August 2007 investigation performed by Weston Solutions, Inc., ranged from 51 ug/kg to 22,000 ug/kg. There has been no source area removal or remediation performed at the Coe's Cleaner site.

III. Conclusion:

As detailed above and previously presented in various reports to EGLE, ZF has performed extensive response actions including site investigations and remediation at the Property and surrounding area for many years. These actions have achieved consistent compliance with Part 201 requirements. ZF continues to perform ongoing response actions associated with the Property, such as operating an active groundwater pumping remedy and completing groundwater monitoring. These remedies continue to be effective at removing CVOC mass from the aquifer and preventing the migration of contaminants from the Property. During the past 30 years, ZF has implemented response activities to achieve cleanup criteria or protect from exposure to the contamination at the Property and continues to do so.

Furthermore, based on the information presented in this letter, ZF disputes EGLE's assertion that there is an imminent and substantial endangerment to public health, safety, and welfare that is being caused by the chlorinated solvent plume from the Property. Based on the multiple lines of evidence that ZF has presented in this response, there is no conclusive evidence regarding the source of the vinyl chloride in OW-16D2 and ZF disagrees with EGLE's presumption that the former Kelsey-Hayes Property is the source. ZF does not have any information indicating that the Village of Milford drinking water system has been or could imminently be impacted with vinyl chloride. Therefore, it does not appear that there is an imminent and substantial endangerment to public health, safety and welfare and the installation of a treatment system on the Village of Milford drinking water system is not necessary and is not ZF's responsibility.

In light of the extensive response actions already undertaken by ZF, the complex history of CVOC contamination in the Village of Milford, and EGLE's request that ZF initiate plans to install treatment on the Milford municipal wells, ZF believes a technical meeting with EGLE would be a productive next step. Arcadis and ZF have made multiple attempts to schedule such a meeting with EGLE, most recently by calling you on November 9th. ZF would appreciate hearing from you regarding some dates and times that EGLE would be available to schedule a technical meeting. Please contact me at your earliest convenience.

Sincerely,

ZF Active Safety US Inc.

A handwritten signature in black ink, appearing to read "Scott D. Detwiler", written over a horizontal line.

Scott D. Detwiler
Regional EHS Manager
ZF Health Safety and Environmental

Cc: John McInnis, Arcadis
Robert Bleazard, ZF Group
Kelly M. Martorano, ZF Group

Attachments: Attachment 1 – Email Correspondence with K. Wojciechowski
Figure 1 – Municipal Well Capture Zone and Known CVOC Sources

Attachment 1

McInnis, John

From: Wojciechowski, Kevin (EGLE) <WojciechowskiK@michigan.gov>
Sent: Wednesday, October 13, 2021 12:49 PM
To: McInnis, John
Cc: Detwiler Scott MSA HEEN; Christian Wuerth; Owens, Paul (EGLE); Wilson, Cheryl (EGLE); Dewyre, Robin (robin.dewyre@amecfw.com); Mark Sweatman; Christian Wuerth; Mike Karl
Subject: RE: Monitoring Well 16D2 Sampling

John,

Continue to monitor OW-16D2 as scheduled below.

Thanks,

Kevin Wojciechowski

Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
Remediation Redevelopment Division
Warren District Office
Cell: 586-623-2948
wojciechowskik@michigan.gov
Pollution Emergency Alerting System: 1-800-292-4706

From: McInnis, John <John.McInnis@arcadis.com>
Sent: Thursday, October 7, 2021 9:53 AM
To: Wojciechowski, Kevin (EGLE) <WojciechowskiK@michigan.gov>
Cc: Detwiler Scott MSA HEEN <scott.detwiler@zf.com>; Christian Wuerth <cwuerth@villageofmilford.org>; Owens, Paul (EGLE) <OWENSP@michigan.gov>; Wilson, Cheryl (EGLE) <WILSONC3@michigan.gov>; Dewyre, Robin (robin.dewyre@amecfw.com) <robin.dewyre@amecfw.com>; Mark Sweatman <mark.sweatman@woodplc.com>; Christian Wuerth <cwuerth@villageofmilford.org>; Mike Karl <mkarll@villageofmilford.org>
Subject: RE: Monitoring Well 16D2 Sampling

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Good morning Kevin,

Currently, we are operating in accordance with the Observation Well 16D2 sampling plan submitted to EGLE on August 3, 2021 via email. Sampling of Observation Well OW16D2 will continue bi-weekly, at a minimum, until October 25, 2021. The concentrations of vinyl chloride in the last three sampling events conducted on 8/16/21, 9/1/21, and 9/13/21 were below the drinking water criterion (DWC). If concentrations of vinyl chloride remain at or below the DWC for the next three sampling events (9/27/21, 10/11/21, and 10/25/21), the sampling frequency will change to monthly for the following three months (November 2021, December 2021, and January 2022). If the concentration of vinyl chloride remains at or below the DWC during these three months, the sampling frequency will return to the semiannual sampling schedule per the groundwater monitoring plan. If the DWC for vinyl chloride is exceeded during any of the remaining

sampling events, the sampling frequency will remain at bi-weekly during the months of November 2021, December 2021, and January 2022.

Regarding the request for a Response Activity Plan (ResAP), we are reviewing site information and are planning to provide the ResAP in accordance with the 90-day schedule mentioned in the Compliance Communication, dated September 1, 2021.

I was able to track down a copy of the 1998 Techna Interim Response Work Plan if you still need it.

Please let me know if you have any questions.

Thanks, John

From: Wojciechowski, Kevin (EGLE) <WojciechowskiK@michigan.gov>

Sent: Wednesday, October 6, 2021 12:31 PM

To: McInnis, John <John.McInnis@arcadis.com>

Cc: Detwiler Scott MSA HEEN <scott.detwiler@zf.com>; Christian Wuerth <cwuerth@villageofmilford.org>; Owens, Paul (EGLE) <owensp@michigan.gov>; Wilson, Cheryl (EGLE) <WILSONC3@michigan.gov>; Dewyre, Robin (<robin.dewyre@amecfw.com> <robin.dewyre@amecfw.com>; Mark Sweatman <mark.sweatman@woodplc.com>; Christian Wuerth <cwuerth@villageofmilford.org>; Mike Karll <mkarll@villageofmilford.org>

Subject: RE: Monitoring Well 16D2 Sampling

Good afternoon John,

What is ZF Corps plans for sampling OW-16D2 after the last October monitoring event? How are things progressing on the Response Active Plan for the groundwater? Now that we have received more data from the wells in the park the hit of vinyl chloride is not going away. Wood has found some old data from when these wells were installed, EGLE is going to be looking for the actual report from the 1990's because Wood doesn't have the complete report. This data is the vertical aquifer profiling that was done when the wells were installed. We can have a meeting once EGLE can track down that report.

Mark, what was the title and date of that vertical aquifer sampling report?

Thanks,

Kevin Wojciechowski

Senior Environmental Quality Analyst

Michigan Department of Environment, Great Lakes, and Energy

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wojciechowskik@michigan.gov

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From: Samp, Marina <Marina.Samp@arcadis.com>

Sent: Thursday, August 5, 2021 1:46 PM

To: Mike Karll <mkarll@villageofmilford.org>; Wojciechowski, Kevin (EGLE) <WojciechowskiK@michigan.gov>

Cc: Detwiler Scott MSA HEEN <scott.detwiler@zf.com>; Christian Wuerth <cwuerth@villageofmilford.org>; McInnis, John <John.McInnis@arcadis.com>

Subject: RE: Monitoring Well 16D2 Sampling

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Hi Kevin and Mike,

A tentative schedule for the next couple months is outlined below. Field staff have reviewed and indicated this will work with their schedules so I do not anticipate too many, if any, changes at this time. Contact info for field staff is listed below in the event it is needed.

- Monday, August 16th at 9:30 AM (Stacey Hannula/Emma Witherspoon)
- Wednesday, September 1st at 9:30 AM (Stacey Hannula/Allyson Hartz)
- Monday, September 13th at 9:30 AM (Allyson Hartz)
- Monday, September 27th at 9:30 AM (Allyson Hartz)
- Monday, October 11th at 9:30 AM (Stacey Hannula)
- Monday, October 25th at 9:30 AM (Stacey Hannula)

Allyson Hartz: 313-401-7398

Stacey Hannula: 517-203-8600

Please let John or myself know if there are any questions or concerns with this schedule.

Thanks!

From: McInnis, John <John.McInnis@arcadis.com>

Sent: Thursday, August 5, 2021 9:50 AM

To: Mike Karll <mkarll@villageofmilford.org>; Wojciechowski, Kevin (EGLE) <WojciechowskiK@michigan.gov>

Cc: Detwiler Scott MSA HEEN <scott.detwiler@zf.com>; Samp, Marina <Marina.Samp@arcadis.com>; Christian Wuerth <cwuerth@villageofmilford.org>

Subject: RE: Monitoring Well 16D2 Sampling

Thanks Mike,

Marina has been working on a tentative schedule for the sampling of Monitoring Well 16D2 and will pass it around to the group.

Thanks, John

From: Mike Karll <mkarll@villageofmilford.org>

Sent: Wednesday, August 4, 2021 4:36 PM

To: McInnis, John <John.McInnis@arcadis.com>; Wojciechowski, Kevin (EGLE) <WojciechowskiK@michigan.gov>

Cc: Detwiler Scott MSA HEEN <scott.detwiler@zf.com>; Samp, Marina <Marina.Samp@arcadis.com>; Christian Wuerth <cwuerth@villageofmilford.org>

Subject: RE: Monitoring Well 16D2 Sampling

Good afternoon John,

That should not be an issue. We do have Milford Memories the weekend prior but cleanup should be wrapping up by then. Could you please provide a tentative schedule for the future sampling events for the next couple of months?

Thank you,

Mike Karl
Director of Public Services
Village of Milford
Office: 248-685-3055
Cell: 248-396-2315
Fax: 248-684-3465

From: McInnis, John
Sent: Wednesday, August 4, 2021 3:30 PM
To: Wojciechowski, Kevin (EGLE); Mike Karl
Cc: Detwiler Scott MSA HEEN; Samp, Marina
Subject: Monitoring Well 16D2 Sampling

Hi Kevin and Mike,

Any conflicts with conducting the next sampling event of Monitoring Well 16D2 on August 16, 2021 around 9 AM?

Thanks, John

John McInnis PE
Senior Engineer/Project Manager
Arcadis of Michigan, LLC
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T +1 248 994 2285
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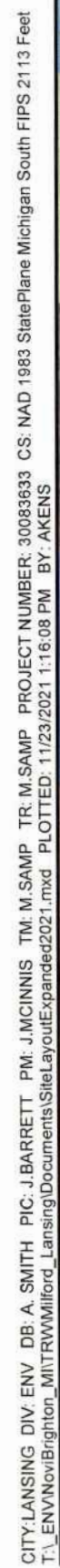
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Request for EGLE Review of Response Activity Plan

This form is required for submittal of a request for EGLE to review a Response Activity Plan, under Section 20114b, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Section A: Type of Response Activity Plan being Submitted (Check all that apply):

Remedial Investigation	<input type="checkbox"/>	20b(2) Site Specific Criteria	<input type="checkbox"/>
Evaluation Plan	<input checked="" type="checkbox"/>	(modification of generic criteria)	
Feasibility Study	<input type="checkbox"/>	20b(3) Site Specific Criteria or Surrogate	<input type="checkbox"/>
Remedial Action Plan	<input type="checkbox"/>	(no generic criteria available)	
Interim Response Plan	<input type="checkbox"/>	Section 20118(4) and (5) Request	<input type="checkbox"/>
Mixing Zone Request	<input type="checkbox"/>	Land or Resource Use Restrictions	<input type="checkbox"/>
20e(14) De Minimis GSI Impact	<input type="checkbox"/>	Other, Specify:	<input type="checkbox"/>

The Response Activity Plan addresses the entire facility:
(entire facility as defined by Part 201, all releases, hazardous substances, and environmental media) ☐

The Response Activity Plan does not address the entire facility: ☒
Please specify the release(s), hazardous substance(s), environmental media, and/or portions of the facility addressed by the Response Activity Plan: Reported detection of vinyl chloride at Observation Well OW-16D2.

Section B: Facility/Property Subject to (Check all that apply):

Facility regulated under Part 201	<input checked="" type="checkbox"/>
Part 201 Facility ID (if known): 63000952	
Leaking Underground Storage Tank regulated pursuant to Part 213	<input type="checkbox"/>
Part 211/213. Facility ID, if known:	
Oil or gas production and development regulated pursuant to Part 615 or 625	<input type="checkbox"/>
Licensed landfill regulated pursuant to Part 115	<input type="checkbox"/>
Licensed hazardous waste treatment, storage, or disposal facility regulated pursuant to Part 111	<input type="checkbox"/>
Consent Agreement or other legal agreement with EGLE	<input type="checkbox"/>

Section C: Facility and Locational Information:

Facility Name: Former Kelsey-Hayes Plant Property	County: Oakland
Street Address of Property: 101 Oak Street	City/Village/Township: Milford
City: Milford State: Michigan Zip: 48381	Town: T 2N Range: R 7 E Section: 10
Property Tax ID (include all applicable IDs): 16-10-227-018	Quarter: NE Quarter-Quarter: NE
Status of submitter relative to the property (check all that apply):	Decimal Degrees Latitude: 42.593101
	Decimal Degrees Longitude: -83.602459
	Reference point for latitude and longitude:
	Center of site <input checked="" type="checkbox"/> Main/front door <input type="checkbox"/>
	Front gate/main entrance <input type="checkbox"/> Other <input type="checkbox"/>
Former Current Prospective	Collection method:
Owner <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Survey <input type="checkbox"/> GPS <input checked="" type="checkbox"/> Interpolation <input type="checkbox"/>
Operator <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	

Section D: Submitter Information:

Entity/person requesting review: ZF Active Safety US Inc.

Contact Person (name and title): Scott Detwiler

Submitter Address: 12025 Tech Center Drive

City: Livonia

Telephone: 480-722-4139

Relationship of contact person to the submitter: Same

Owner Name, if different from submitter: Village of Milford

Address: 1100 Atlantic Street

City: Milford

Telephone: 248-684-1515

State: Michigan

Zip: 48150

E-Mail: scott.detwiler@zf.com

Company:

State: Michigan

Zip: 48381

E-Mail: info@villageofmilford.org

Section E: Are/were the following present at the facility (Check all that apply):

	Current	Previous	Unknown
Mobile or Migrating Non-Aqueous Phase Liquids (NAPL)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil contamination above any residential criteria	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil contamination above any non-residential criteria	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil aesthetic impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater contamination above any residential criteria	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater contamination above any non-residential criteria	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater aesthetic impacts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil Gas contamination above residential vapor intrusion (VI) screening levels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soil Gas contamination above non-residential VI screening levels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conditions immediately dangerous to life or health (IDLH)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fire & Explosion hazards related to releases	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contamination existing in drinking water supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Imminent threat to drinking water supply	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Impact to Surface Water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Surface Water Sediments above screening levels	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section F: The following questions assist EGLE in evaluating this request.

Known or Suspected Contaminant(s) Type (Check all that apply):
Petroleum ☐ Volatile Organic Compounds ☒ Metals ☐ Other ☐

Current Site Status (Check all that apply):
Undergoing property transfer ☐ Active operations ☐ Inactive operation ☒

Current Property Use:
Residential ☐
Non-residential ☒

Anticipated Property Use:
Residential ☐
Non-residential ☒

Estimated Area of Contamination Addressed in Response Action Plan (Cumulative):
Currently undetermined ☐ < 0.5 acre ☐ > 0.5 acre ☒

Migration:

	Yes	No	Unknown
Has contamination migrated beyond the property boundaries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has the Notice of Migration been submitted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Facility Investigation Status:
Ongoing ☐ Complete ☒

Facility Response Activity Status (Check all that apply):
None ☐ IR Implemented ☒ Response Activity Ongoing ☐ Response Activity Completed ☐

Drinking Water Supply for Facility (Check all that apply):
Municipal ☐ Private Well(s) ☐ No Current Water Supply ☒ Municipal Available ☒

On-site Well(s) (Check all that apply):

Drinking Water ☐ Industrial/Commercial Production ☐ Agricultural/Irrigation ☐ No well on-site ☐
Approximate Depth of Well(s): Site Contains Observation Wells Only

Local Drinking Water Supply:

Is facility in a designated Wellhead Protection Area? Yes ☒ No ☐
Distance to nearest off-site drinking water well: 2,000 Feet Private ☐ Municipal ☒

Surface Water Bodies on or Adjacent to Facility (Check all that apply):

Wetlands ☐ Ditch ☐ Stream/River ☒ Lake/Pond ☒

Local Surface Water Bodies:


Distance to nearest wetland: Ditch: Stream/River: Lake/Pond: Approx. 550 Feet
(Downgradient of Site)

Have other plans been submitted for this facility?

Facility Name, if different than this submittal: Same
Date and Name of most recent submittal: Remedial Action Plan-1/30/2009 and Tech Memo Regarding Remedial
Action Plan – 1/11/2010

Section G: Environmental Professional Signature:

With my signature below, I certify that this plan and all related materials are true, accurate, and complete to the best of my knowledge and belief.

Signature: 

Date: 11/23/2021

Printed Name: Troy Sclafani

Company of Environmental Professional: Arcadis

Address: 28550 Cabot Drive, Suite 500

City: Novi

State: Michigan

Zip: 48377

Telephone: 248-994-2288

E-mail address: Troy.Sclafani@arcadis.com

Section H: Submitter Signature:

With my signature below, I certify that this plan and all related materials are true, accurate, and complete to the best of my knowledge and belief and I am legally authorized to sign for the submitter.

Signature: 

Date: 11/23/2021

Printed name: Scott Detwiler

Title/Relationship of signatory to submitter: Regional EHS Manager/ZF Active Safety US Inc.

Address: 12025 Tech Center Drive

City: Livonia

State: Michigan

Zip: 48150

Telephone: 480-722-4139

E-Mail address: scott.detwiler@zf.com

This form and the Response Activity Plan should be submitted to EGLE Remediation & Redevelopment Division District Office for the county in which the property is located, unless the response activity is related to a facility that is regulated by another EGLE Division. A district map is located at www.michigan.gov/EGLErrd. If regulated by another division, contact should be made with that division for information on where to submit the form and plan.

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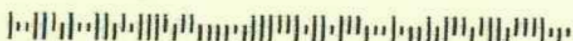
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STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENT, GREAT LAKES, & ENERGY
REMEDATION AND REDEVELOPMENT DIVISION
27700 DONALD COURT
WARREN, MI 48092-2793

KW



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

ZF Active Safety US Inc.
Attention: Scott Detwiler
12025 Tech Center Drive
Livonia, Michigan 48150-2122



9590 9402 4870 9032 2479 09

2. Article Number (Transfer from service label)

7020 2450 0000 0100 7280

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A. Signature

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☒ Agent☐ Addressee

B. Received by (Printed Name)

Rt US Cone 19

C. Date of Delivery

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☐ Yes

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