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

Department General Legal
From Kelly M. Martorano
Phone 248-807-7975
Email kelly.martorano@zf.com
Date April 15, 2022

VIA EMAIL: nellerm@michigan.gov
AND CERTIFIED MAIL

Mr. Mike Neller, Director
Remediation and Redevelopment Division
Michigan Department of Environment, Great Lakes, and Energy
Constitution Hall, 5th Floor, South Tower
525 West Allegan Street
Lansing, Michigan 48933-1502

RE: ZF Active Safety US Inc.'s (Respondent's) Intent to Comply with Administrative Order for Response Activity; EGLE Docket No. AO-RRD-22-001.

Dear Mr. Neller,

Pursuant to Section XVII of the Administrative Order for Response Activity (AO) issued by the Department of Environment, Great Lakes, and Energy (EGLE) to ZF Active Safety US Inc. (ZF or Respondent) on March 16, 2022, with respect to the former Kelsey-Hayes site in Milford, Michigan (the "Site"), this letter confirms that ZF intends to comply with the AO and EGLE's subsequent April 14, 2022 Response to ZF's letters dated April 8 and April 13, 2022, providing additional information for consideration related to the AO (the "April 14 EGLE Letter").

ZF is committed to protecting the environment and acting as a responsible corporation and member of the communities where we currently have facilities or have had facilities in the past. ZF actively assumes responsibility for its impact on the environment and strives to promote the environmental and social performance of its business and well-being of its employees.

In accordance with Section VII of the AO, ZF is designating Scott Detwiler as the Project Manager for the activities required by the AO and any communications and correspondence with EGLE regarding the AO. The ZF Project Manager contact information is included below:

Scott Detwiler
ZF Active Safety US Inc.
Sr. Regional Manager, Environmental, Health and Safety
11202 E. Germann Rd.
Mesa, Arizona 85212
(480) 722-4139 Work
(480) 600-7433 Mobile
Scott.detwiler@zf.com

For the reasons presented below and notwithstanding ZF's intent to comply with the AO, ZF admits no liability or responsibility with respect to the factual allegations or legal determinations made in the AO and reserves any and all rights and remedies it may have under the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The administrative record for the Site, which spans

over 25 years, and additional information obtained by ZF since the issuance of the AO, clearly demonstrates that there is no objectively reasonable basis to properly conclude under Part 201 of NREPA, MCL §324.20101 et seq. ("Part 201") that, as stated in Paragraphs 4.8 and 4.11 of the AO: (1) vinyl chloride is present in the groundwater at the location of monitoring well OW-16D2 and it alone presents an imminent and substantial endangerment to the public health, safety, welfare, or the environment due to the proximity of OW-16D2 to the Village of Milford's municipal drinking water wells; and (2) the groundwater impacts from the Site are the source of the vinyl chloride in OW-16D2.

As set forth in the two (2) letters submitted to EGLE on April 8 and 13, 2022 (Exhibit 1 and Exhibit 2), after observing anomalous water level response during low-flow sampling of OW-16D2, ZF completed initial well redevelopment activities on April 1st and has assembled compelling information to show that the vinyl chloride that had been detected in OW-16D2 prior to the recent well redevelopment work was the result of stagnant water within the well and not representative of actual groundwater conditions. Based on this information, ZF contends that there is an objectively reasonable basis and sufficient technical evidence to support a finding that additional well redevelopment work and sample collection should be completed before making a conclusive determination that the vinyl chloride sample results from OW-16D2 prior to well redevelopment are accurate representations of vinyl chloride being in groundwater at that location, demonstrate that vinyl chloride is sourced from the groundwater impacts from the Site, or creates an imminent and substantial endangerment to the Village of Milford municipal wells.

On April 14, 2022, EGLE responded to ZF's letters noted above and agreed that the information presented by ZF regarding anomalous conditions in groundwater well OW-16D2 warrants additional investigation by ZF. See Exhibit 3. The April 14th EGLE Letter further supports ZF's plans to prepare a work plan and undertake a parallel path to further redevelop and possibly replace OW-16D2 and offers specific recommendations for the work plan. ZF will incorporate EGLE's recommendations into its work plan for OW-16D2 and will submit the work plan to EGLE for review and comments. ZF will communicate with EGLE regarding our progress on the work plan. The additional redevelopment work and review of OW-16D2 pursuant to the work plan will ensure that any samples from OW-16D2, or its replacement, are based on accurate and reliable, representative data collected from a properly-performing monitoring well in accordance with EGLE requirements and can be appropriately used to determine applicable requirements under Part 201.

ZF refutes the allegation in Section 4.8 of the AO that the presence of vinyl chloride in OW-16D2, and cis-1,2-dichloroethene (DCE) in the Village of Milford municipal drinking water wells, is an indication that the groundwater impacts from the Site are migrating to OW-16D2 and the Village of Milford municipal wells. During the meeting to confer with EGLE on March 31, 2022, pursuant to Section XVIII of the AO, ZF presented information which showed that there is no technical basis for determining that the portion of the groundwater impacts from the Site, beyond the Site's groundwater treatment system extraction wells, is degrading to vinyl chloride and migrating in the direction of OW-16D2 and the Village of Milford municipal wells. The following evidence was presented:

- Vinyl chloride has never been detected in the Village of Milford municipal wells. In the 2009 Remedial Action Plan (RAP) submitted for the Site and during the March 31st meeting, Arcadis presented groundwater velocity calculations ranging from 1.4 feet/day (static) to 76 feet/day (pumping). Based on these calculations, if vinyl chloride was mobile in groundwater near OW-16D2 and moving toward the Village of Milford wells, then it would have been detected in the Village wells several months ago. However, vinyl chloride has not been detected.
- There have been no vinyl chloride detections in off-site monitoring wells; most notably the monitoring wells that have consistently demonstrated the extent of trichloroethene (TCE) in the groundwater from the Site (TCE being the presumed parent chlorinated volatile organic compound (CVOC) for dichlorination daughter products). This includes multi-level wells along Liberty Street

which EGLE believes are downgradient of the Site's groundwater treatment system extraction wells and upgradient of OW-16D2. The Liberty Street wells have shown no detections of vinyl chloride.

- Groundwater modeling showing: (1) the extent of the groundwater impacts from the Site outside of the Village of Milford municipal well capture zone; (2) forward particle tracking showing groundwater flow from the Site to the southwest, away from the Village of Milford wells and OW-16D2 and consistent with the spatial orientation of the groundwater impacts from the Site as defined by monitoring wells and vertical aquifer profiling (VAP) data. The groundwater model was run using the Village of Milford's current average pumping rate and a previously reported higher pumping rate provided by the Milford Department of Public Services and deemed appropriate to assess long-term influence on groundwater flow conditions. In addition, forward particle tracking simulations run with our model, indicate particles released at the former Spiral Industries Part 201 Facility encroach on the ZF monitoring well network on Liberty Street. Based on a review of a recent Baseline Environmental Assessment (BEA) completed at the Spiral Industries site, known CVOC contamination, including vinyl chloride, DCE, and TCE exists and has not been defined beyond the boundaries of the Spiral Industries property.
- The highest reported concentration of vinyl chloride at OW-16D2 was the first detection of 3.5 ug/L in May 2021, which did not subsequently result in a detection in the Village of Milford wells, despite the proximity and high groundwater velocity.
- The results of ongoing monitoring of the groundwater wells at Liberty Street and to the south of Liberty Street that are beyond the influence of the pumping wells, have been consistent with historical data showing no indication of changes over time that would affect contaminant fate and transport.

Beyond the extensive investigation, analysis and ongoing cleanup work being performed by ZF for the Site, there are confirmed sources of CVOC contamination near and upgradient of OW-16D2, which include vinyl chloride and/or other parent CVOCs as a contaminant and there are other known sources of CVOC groundwater contamination in the Village of Milford. The other known sources of CVOCs include the former Spiral Industries Part 201 Facility and the Coe's Cleaners Part 201 Facility. The Spiral Industries Facility in particular, is upgradient of OW-16D2 and the Village of Milford municipal wells and the extent of contamination related to the Spiral Industries Facility has not been defined beyond the property boundary.

The former Spiral Industries Facility is located north of the Village of Milford municipal wells. Based on a BEA submitted to EGLE in June 2014 that ZF has reviewed, concentrations of CVOCs detected at the former Spiral Industries Facility include, but are not limited to: vinyl chloride (soil: 709 ug/kg and groundwater: 280 ug/l), TCE (soil: 2,620,000 ug/kg and groundwater: 153 ug/l), and DCE (soil: 215,000 ug/kg and groundwater: 650 ug/l). Unlike the Site, the extent of groundwater contamination associated with the Spiral Industries Facility has not been defined beyond the property boundary. In our meeting on March 31st, EGLE explained that there are no additional data available to determine the extent of groundwater contamination from the Spiral Industries Facility because the current owner who is redeveloping the property is not required to define hazardous substances beyond what was required for the BEA and no other responsible party under Part 201 has offered or been demanded by EGLE to define the extent of contamination in light of the wellhead protection zone. Given the known information regarding CVOCs present at the Spiral Industries Facility, it seems that additional and complete CVOC delineation related to this site is warranted and would not only help answer some currently unanswered questions about the extent of potential off-site contamination, but is also necessary and appropriate to understand potential impacts on the Village of Milford's municipal wells.

In light of the long working relationship between EGLE and ZF at the Site, potential public health concerns, and the technical anomaly of vinyl chloride being detected recently and intermittently at only one of many monitoring wells in over 25 years, ZF does not understand why EGLE elected to issue this AO without first providing ZF an opportunity to meet with EGLE, and partner together on determining the reason for such a detection at that well, but nowhere else, and any measures to address it. As noted in Paragraph 4.9 of the AO, EGLE sent ZF a Compliance Communication regarding the Site on October 25, 2021 (the "Compliance Communication"). What the AO leaves out however, is that ZF responded to the Compliance Communication in a timely manner by submitting a detailed letter to EGLE on November 23, 2021, raising several technical questions and concerns regarding the Compliance Communication ("ZF's Response Letter"). ZF's letter concluded with the following request for a meeting with EGLE:

> "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 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." See Exhibit 4, ZF Response to EGLE Compliance Communication.

After some additional attempts to reach EGLE about having a meeting, ZF was finally told that EGLE would be responding to ZF's Response Letter. Over the nearly four months since ZF submitted its Response Letter to EGLE, ZF received email acknowledgements that EGLE had received our sampling results for OW-16D2, but never received a response to ZF's Response Letter or any meaningful feedback from EGLE to address the questions raised by ZF. Instead, EGLE issued the AO to ZF on March 16, 2022. ZF takes all matters that involve threats to human health and the environment seriously and this matter is no exception and this is why ZF requested a meeting several times after receiving the Compliance Communication.

As was described in detail in ZF's Response Letter, and as EGLE is aware, ZF has been performing various investigation and response activities at the Site for over 25 years. See Exhibit 4. During that time, ZF has always responded in a timely manner to EGLE's requests and has willingly taken responsibility for the Site. ZF has actively engaged with EGLE regarding the most appropriate and feasible remediation techniques for the Site and has worked cooperatively with the Village of Milford with respect to the Site as well. Ultimately, ZF and the Village of Milford agreed on a transfer of the Site to the Village in 2014 to facilitate its eventual redevelopment and beneficial use in the community. ZF, EGLE and the Village of Milford have generally enjoyed an open and productive working relationship with the mutual objective of protecting human health, welfare, and the environment.

ZF appreciates that EGLE thoughtfully reviewed and considered the additional information about OW-16D2 that we provided in our recent letters and appreciates that EGLE remains open to reconsidering the AO upon a showing that there is not an imminent and substantial risk to the Village of Milford municipal wells due to the presence of vinyl chloride in groundwater at the location of OW-16D2. ZF intends to continue our long standing working relationship with EGLE and the Village of Milford to ensure that the ongoing activities at the Site to address the AO, including ZF's incorporation into its work plan of the recommendations in the April 14 EGLE Letter, continue to proceed in line with Part 201.

Thank you for your attention to these matters and please include this letter and its attachments in the administrative record for the AO and the Site. If you have any questions, please contact me at the phone number listed in the header on the first page of this letter.

Sincerely,

Kelly M. Martorano

Kelly M. Martorano
ZF Group
Senior Attorney – Environmental, Health & Safety

Enclosures
cc by email only:

Mr. Scott Detwiler, ZF
Mr. Robert Bleazard, ZF
Mr. John McInnis, Arcadis
Mr. Troy Sclafani, Arcadis
Mr. Grant Gilezan, Dykema
Mr. Paul Stewart, Dykema
Mr. Christian Wuerth, Village Manager, Village of Milford
Ms. Polly Synk, Michigan Department of Attorney General
Ms. Danielle Allison-Yokom, Michigan Department of Attorney General
Mr. Aaron B. Keatley, EGLE - Chief Deputy Director, EGLE
Mr. Kevin Wojciechowski, Project Manager, EGLE
Mr. Josh Mosher, EGLE – Remediation and Redevelopment Assistant Director
Mr. Dan Yordanich, EGLE
Ms. Mary Miller, EGLE
Mr. Darren Bowling, EGLE
Mr. Paul Owens, EGLE
Ms. Cheryl Wilson, EGLE
Ms. Lyndsey Hagy, EGLE
Ms. Katie Noetzel, EGLE

EXHIBIT 1

April 8, 2022 – ZF Letter RE: Additional Information for Consideration by EGLE

ZF Active Safety US Inc.
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Department Health Safety andEnvironmental
From Robert Bleazard
Phone +1 480 722-4866
Email Robert.Bleazard@zf.com
Date April 8, 2022

VIA E-MAIL TO: WojchiechowskiK@Michigan.gov

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. Additional Information for Consideration by Michigan Department of Environment, Great Lakes, and Energy Related to Administrative Order for Response Activity; EGLE Docket No. AO-RRD-22-001.

Dear Mr. Wojciechowski,

ZF Active Safety US Inc. (ZF) appreciates the opportunity to meet with the Department of Environment, Great Lakes, and Energy (EGLE) last Thursday, March 31, 2022, to discuss the Administrative Order for Response Activity (AO) issued by EGLE to ZF, with respect to the former Kelsey-Hayes site in Milford, Michigan (the "Site").

As demonstrated by ZF's November 23, 2021 letter in response to EGLE's October 25, 2021 Compliance Communication and its presentation of information at the meeting, ZF and Arcadis have been reviewing the extensive data collected for the Kelsey-Hayes site, as well as any other available information, in order to understand the recent emergence of vinyl chloride in groundwater monitoring well OW-16D2 when that compound has not been detected at any time elsewhere in ZF's off-site monitoring well network in more than 25 years of monitoring. Furthermore, Arcadis recently noted an anomalous response in water level and certain groundwater parameters in the well during sampling, raising concerns regarding the possible integrity of the well screen and/or the sand pack surrounding the well screen. In addition, considering EGLE's concerns regarding the proximity of OW-16D2 to the Village of Milford municipal wells and the statement in the Administrative Order that "the presence of vinyl chloride in monitoring well OW-16D2, a known carcinogen, represents an imminent and substantial endangerment to the public health, safety, welfare, or the environment…," ZF and Arcadis carefully analyzed the current viability of OW-16D2 and began evaluating whether samples collected from this well are representative of the aquifer.

Arcadis initially questioned whether OW-16D2 may be compromised because there was significant drawdown in the well during most of the low-flow sampling events where vinyl chloride was detected and purge volumes were observed to be similar to the volume of standing water removed from the well. This indicated stagnant water conditions in the well. In addition, water samples with vinyl chloride detections had an oxidation reduction potential (ORP) in the range of -60 to -134 millivolts and low dissolved oxygen (DO) levels (see attached Table 1 – Attachment 1). These conditions within the well provide a reducing environment where anerobic microbes are active and reductive dichlorination of chlorinated volatile organic compounds (CVOCs) can occur (i.e., cis-1,2-dichloroethene to vinyl chloride). Furthermore, vinyl chloride has not been detected in the

six observation wells, OW-9, OW-09ML-A/B/C/D, and MW-03-94, located upgradient of OW-16D2, in the Village of Milford drinking water wells, or in any of the other monitoring wells regularly sampled by Arcadis that have proven to be reliable in monitoring other CVOCs including trichloroethene (TCE). Collectively, these multiple lines of evidence are what caused Arcadis to take a closer look at the condition of OW-16D2 and also suggests that the recent detection of vinyl chloride in OW-16D2 is localized, anomalous, and warrants further evaluation. The inability of OW-16D2 to sustain EGLE's low-flow sampling and groundwater parameter stabilization requirements also indicates that groundwater samples collected from OW-16D2 are: 1) not representative of groundwater conditions; 2) not comparable to EGLE's Part 201 Cleanup Criteria for compliance purposes; and 3) therefore not a reliable basis for the conclusion by EGLE that OW-16D2 poses an imminent and substantial endangerment to the Village of Milford wells.

As Arcadis has previously discussed with you and as mentioned during the meeting, ZF's monitoring well OW-16D2 was further examined and redeveloped on Friday, April 1st with the objective of improving hydraulic communication between the well and formation to produce representative groundwater samples. During the examination and redevelopment of OW-16D2, Stearns, the well driller, used a surge block with a vacuum hose attachment to work up and down within the well screen and draw out sediments consistent with standard practice. Stearns moved this apparatus up and down within the well screen several times. During the process, there was initial discolored water and some fine sediment removed and then it cleared up. The plan was to then drop a pump down the well and purge water/groundwater as it re-entered the well, removing as much water as possible. However, after pulling the surge block apparatus out of the well, there was only about 2 feet of water remaining in the well (approximately 1/3 gallon). The amount of water in the well when Stearns started the redevelopment process was about 100 feet (approximately 16 gallons). This indicates that the well screen, sand pack, and/or formation around the screen is not functioning as designed. Arcadis measured the level of water in the well after this work and it recovered very slowly, at a rate of less than 1 foot per hour. Based on these observations, it appears that the water in the screened interval of the well was stagnant and therefore not fully representative of groundwater conditions in the aquifer. These well redevelopment findings, combined with the observations noted above regarding well behavior during sampling, indicate that OW-16D2 has become compromised and cannot be relied on for continued groundwater monitoring without further evaluation and potential corrective action on the well.

Following the redevelopment, Arcadis returned to sample OW-16D2 on Monday, April 4th and observed that the depth to groundwater was about 50 feet (so about 50 feet had recovered over the weekend). Arcadis used a low-flow bladder pump to purge the well (this took about 2 hours) and then sampled the well. The total drawdown of the well was approximately 7 feet during the sampling. Arcadis observed the water level in OW-16D2 to be relatively level for the last 10 minutes prior to sampling, indicating that the recharge was coming from the aquifer and not stagnant water within the well. One set of groundwater samples was collected on April 4th and was dropped off at Fibertec (Holt, Michigan) the same day, with a requested 48-hour turn-around-time and another set of samples was sent to Eurofins-TestAmerica for analysis under a standard turn-around-time. Analysis for volatile organic compounds using EPA Method 8260 was requested for both sets of samples.

The results from the Fibertec samples were returned on April 6th and as you know, were non-detect (less than 1.0 ug/L detection limit) for vinyl chloride. In contrast, cis-1,2-dichloroethene, trans-1,2-dichloroethene, and 1,1-dichloroethane were detected and the concentrations of these other CVOCs were consistent with previous samples collected from OW-16D2, indicating that these compounds are stable in the formation water that entered OW-16D2 after development and are not degrading to vinyl chloride in the vicinity of OW-16D2. The laboratory

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analytical report (Attachment 2) was provided to you on April 6th. These findings, combined with the previous OW-16D2 sampling results and the well redevelopment observations described above show that the production of vinyl chloride appears to be a function of stagnant water within the well caused by the malfunctioning well itself. Additional samples from OW-16D2 will be collected on April 8th and April 18th. Arcadis will sample the well under as close to low-flow conditions as the well is able to sustain and will promptly report the results to EGLE.

Based on the observed conditions of OW-16D2 during the recent sampling and redevelopment of the well and the historical information provided above, there is an objectively reasonable and technical basis to conclude that the recent samples collected before the redevelopment of the well should not be relied upon as accurate representations of aquifer conditions in that location. Specifically, the following observations point to a lack of reliability for recent vinyl chloride results collected from OW-16D2:

- Inability of the OW-16D2 monitoring well to sustain low-flow purging/sampling consistent with EGLE guidelines;
- Recent consistent reducing conditions (i.e., negative ORP, low DO) with stagnant water conditions observed in OW-16D2, correlating with the observance of vinyl chloride detections that have improved after well redevelopment;
- The first occurrence of vinyl chloride in May 2021 after more than 25 years of monitoring, and its subsequent lack of detection following redevelopment of OW-16D2; while other CVOCs in OW-16D2 remained consistent with historical results;
- Continuing lack of vinyl chloride detections in any other monitoring wells, notably those that have unquestionably demonstrated the extent of TCE impacts, the presumed parent CVOC for dichlorination daughter products;
- Lack of vinyl chloride detections in Village of Milford municipal wells despite groundwater velocity calculations showing it would have arrived months ago if mobile.

Collectively, these findings provide compelling evidence of data quality concerns for OW-16D2 that must be further evaluated and corrected. It is imperative that any conclusions drawn from OW-16D2 sample results and determinations of potential additional response activities are based on accurate and reliable, representative data collected from a properly-performing monitoring well in accordance with EGLE requirements. Therefore, ZF intends to continue to evaluate OW-16D2 and collect additional data for this well which will be expedited and reported to EGLE as soon as available. We are planning to re-sample OW-16D2 on April 8th one week following redevelopment as previously discussed with you via email on April 1st. OW-16D2 will also be sampled again on April 18th.

In addition to the additional monitoring planned for OW-16D2, ZF is also evaluating potential corrective measures for the well including, further well rehabilitation using an approvable drinking water well additive as was communicated with EGLE via email on April 4th, and a downhole camera survey of the well. ZF is also evaluating potentially replacing OW-16D2 if the rehabilitation is not feasible or not successful, as you suggested. Such corrective measures would include a work plan that would be submitted to EGLE for review and approval, and careful coordination with the Village of Milford to ensure protection of the municipal wells.

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In light of the recent findings regarding OW-16D2 detailed above and considering that the basis for the AO is EGLE's determination that the vinyl chloride reported in recent samples from OW-16D2 above the Part 201 Drinking Water Criterion, pose an imminent and substantial endangerment to the Village of Milford municipal wells due to their proximity to OW-16D2, it would be prudent for all parties to have reliable data and an objective basis for decisions moving forward. Allowing ZF more time to remedy OW-16D2 and collect accurate data from the well will allow the parties to make a proper technical determination of whether vinyl chloride is in the aquifer at the location of OW-16D2. This information would also provide a strong basis to determine if there is any reasonably objective and technical need to implement the response activity required by the AO and would further serve to inform future discussions and decisions by EGLE, the Village of Milford, and ZF. ZF will follow-up this correspondence with the sample results to be collected from OW-16D2 on April 8th, which we expect to receive from the lab by April 12th, and with our plans to implement the OW-16D2 rehabilitation and/or replacement as necessary. ZF will also provide a formal response to the AO, but wanted to provide you with this recently obtained additional information for your consideration at this time.

Thank you for your attention to these matters and please include this letter and its attachments in the administrative record for the AO and the Site.

If you have any questions, please feel free to contact me at the phone number listed in the header on the first page of this letter, Mr. Scott Detwiler – ZF Project Manager at 480-722-4139, or Mr. John McInnis of Arcadis at 248-994-2285.

Sincerely,

Robert A Bleazard

Robert Bleazard
Sr. EHS Manager – Environmental Remediation
ZF Health, Safety, and Environment

Enclosure
cc by email only:

Mr. Scott Detwiler, ZF
Mr. Robert Bleazard, ZF
Ms. Kelly Martorano, ZF
Mr. John McInnis, Arcadis
Mr. Troy Sclafani, Arcadis
Mr. Grant Gilezan, Dykema
Mr. Paul Stewart, Dykema
Mr. Christian Wuerth, Village Manager, Village of Milford
Ms. Polly Synk, Michigan Department of Attorney General
Ms. Danielle Allison-Yokom, Michigan Department of Attorney General
Mr. Aaron B. Keatley, EGLE - Chief Deputy Director, EGLE
Mr. Mike Neller, EGLE - Remediation and Redevelopment Director

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Mr. Josh Mosher, EGLE – Remediation and Redevelopment Assistant Director
Mr. Dan Yordanich, EGLE
Ms. Mary Miller, EGLE
Mr. Darren Bowling, EGLE
Mr. Paul Owens, EGLE
Ms. Cheryl Wilson, EGLE
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ATTACHMENT 1

Table 1
OW16D2 Groundwater Analytical Results and Field Parameters
Former Kelsey-Hayes Milford Plant

ARCADIS

Sample Identification:	Residential Drinking Water Criteria	Groundwater Surface Water Interface Criteria	Observation Well OW-16D2																	
Sample Collection Date:			6/15/2010	12/17/2010	6/15/2011	12/14/2011	6/29/2012	12/12/2012	6/12/2013	12/11/2013	6/15/2014	11/24/2014	6/24/2015	12/9/2015[1]	6/14/2016[1]	12/13/2016	12/6/2017	6/12/2018	12/4/2018	6/10/2019	12/3/2019
Tetrachloroethene	5.0 (A)	60 (X)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichloroethene	5.0 (A)	200 (X)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
cis-1,2-Dichloroethene	70 (A)	620	2.4	3.2	2.1	<1.0	1.4	12	<1.0	3.4	<1.0	22	<1.0	19	<1.0	1.7	18	<1.0	4.1	1.2	1.1
trans-1,2-Dichloroethene	100 (A)	1,500 (X)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	1.3	<1.0	1.2	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
1,1-Dichloroethane	880	740	<1.0	<1.0	1.1	<1.0	<1.0	2.1	<1.0	<1.0	<1.0	3.0	<1.0	2.3	<1.0	<1.0	1.9	<1.0	2.1	1.6	1.4
Vinyl chloride	2.0 (A)	13 (X)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Field Parameters																					
Drawdown (feet)			-0.3	2.8	0.0	1.5	0.0	0.0	0.0	0.0	0.0	1.3	0.4	5.1	4.7	12.2	8.4	4.6	5.5	8.5	3.5
pH (standard units)			7.36	7.74	7.82	7.44	7.60	7.57	7.90	7.85	7.17	7.79	7.82	7.56	7.62	7.91	8.05	7.67	7.41	7.87	7.82
Conductivity (milliSiemens per centimenter)			0.59	0.56	0.64	0.54	0.64	0.60	0.64	0.59	0.60	0.80	0.634	0.952 [1]	0.827 [1]	0.604	0.63	0.64	0.62	0.64	0.82
Turbidity (Nephelometric Turbidity Unit)			1.09	4.22	3.67	0.76	3.68	2.24	0.60	2.43	2.19	102	2.27	52.1	0.61	1.36	11.7	0.80	2.2	3.06	0.79
Dissolved Oxygen (milligrams per liter)			1.33	0.47	0.11	1.44	0.56	0.8	1.19	3.45	4.99	3.8	4.08	0.19	3.22	0.38	0.3	3.04	1.21	0.25	11.74
Temperature (degrees Celsius)			14.66	9.23	15.71	10.33	17.45	9.90	15.19	10.39	14.72	10.83	14.1	11.75	13.89	11.33	10.6	14.60	10.96	12.7	8.6
Oxidation Reduction Potential (millivolt)			75	-12.5	78.3	12.7	125.1	110.6	115.1	115	82.4	-17.4	-39.1	-155.3	27.7	101.4	-121.6	203.7	159.9	231.9	122

Sample Identification:	Residential Drinking Water Criteria	Groundwater Surface Water Interface Criteria	Observation Well OW-16D2																	
Sample Collection Date:			5/13/2020	11/17/2020	5/13/2021	6/8/2021	8/3/2021	8/16/2021	9/1/2021	9/13/2021	9/27/2021	10/11/2021	10/25/2021	11/8/2021	12/6/2021	1/4/2022	1/25/2022	2/17/2022	3/21/2022	4/4/2022
Tetrachloroethene	5.0 (A)	60 (X)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
Trichloroethene	5.0 (A)	200 (X)	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
cis-1,2-Dichloroethene	70 (A)	620	<1.0	<1.0	17	10	16	13	16	20	18	12	17	17	8.2	15	15	12	18	19
trans-1,2-Dichloroethene	100 (A)	1,500 (X)	<1.0	<1.0	1.3	<1.0	1.6	1.1	1.3	1.7	1.7	1.1	1.6	1.5	<1.0	1.6	1.4	1.1	1.6	1.7
1,1-Dichloroethane	880	740	<1.0	<1.0	3.8	2.4	3.8	3.0	3.2	3.9	3.7	2.8	3.8	4.2	2.0	3.0	3.4	3.1	3.7	3.5
Vinyl chloride	2.0 (A)	13 (X)	<1.0	<1.0	3.5	1.2	3.0	1.8	1.7	1.6	1.8	1.4	1.5	1.5	<1.0	2.5	3.2	2.0	2.3	<1.0
First Depth to Water																				
Field Parameters																				
Drawdown (feet)			4.2	10.2	0.0	0.0	12.7	14.2	15.0	10.6	13.7	15.2	8.1	10.9	7.5	8.1	17.4	17.4	7.1	6.9
pH (standard units)			8.51	8.44	7.89	7.6	7.5	7.68	7.64	7.28	7.38	7.81	7.49	7.43	8.02	7.56	7.54	7.77	7.54	7.43
Conductivity (milliSiemens per centimenter)			0.78	0.71	0.93	0.85	0.93	0.718	1.011	1.03	1.07	0.97	1.09	1.07	0.84	1.1	1.11	0.985	1.082	1.1
Turbidity (Nephelometric Turbidity Unit)			2.29	1.08	59.6	5.29	33.8	6.82	3.86	3.9	9.44	9.05	10.7	10.1	4.74	28.4	13.7	4.9	3.04	96.3
Dissolved Oxygen (milligrams per liter)			4.9	9.67	0.45	0.41	1.32	0.25	0.38	0.86	0.22	0.58	0.15	0.17	0.27	0.2	0.1	0.57	0.51	5.81
Temperature (degrees Celsius)			11.6	12.3	12.2	17.4	15.6	14.1	15	14.1	15	15.5	12.4	14	10.8	10.8	9.8	9.9	10.4	7.1
Oxidation Reduction Potential (millivolt)			155.1	12.1	-134	-104.1	-99	-139.1	-74.7	-64.8	-99.9	-99.2	-88.2	-66.4	-14	-93.1	-96.7	-61.3	-72.3	3.0

Notes:
All volatile organic compound concentrations are in micrograms per liter (µg/L).
(A) Criterion is the State of Michigan Drinking Water Standard established pursuant to Section 5 of the Safe Drinking Water Act No. 399 of the Public Acts of 1976.
(X) The Groundwater Surface Water Interface (GSI) criterion shown is not protective for surface water that is used as a drinking water source.
[1] Specific Conductivity

ATTACHMENT 2

Fibertec
environmental
services

Wednesday, April 06, 2022

Fibertec Project Number:	A07755
Project Identification:	TRW Milford ZF Active Safety (30046730) /30046730
Submittal Date:	04/04/2022

Mrs. Marina Samp
Arcadis U.S., Inc. - Novi
28550 Cabot Drive
Suite 500
Novi, MI 48377

Dear Mrs. Samp,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note TO-15 samples will be disposed of 7 calendar days after the reporting date. All other samples will be disposed of 30 days after the reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Sue Ricketts

By Sue Ricketts at 12:26 PM, Apr 06, 2022

For Daryl P. Strandbergh
Laboratory Director

Enclosures

Client Identification:	Arcadis U.S., Inc. - Novi	Sample Description:	FIELDBLANK_040422	Chain of Custody:	201041
Client Project Name:	TRW Milford ZF Active Safety (30046730)	Sample No:		Collect Date:	04/04/22
Client Project No:	30046730	Sample Matrix:	Blank: Field	Collect Time:	11:45

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07755-001** **Matrix: Blank: Field**
Method: EPA 5030C/EPA 8260D **Description: FIELDBLANK_040422**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
1. Acetone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
‡ 2. Acrylonitrile	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
3. Benzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
4. Bromobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
5. Bromochloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
6. Bromodichloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
7. Bromoform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
8. Bromomethane	U	V-L-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
9. 2-Butanone	U		µg/L	25	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
10. n-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
11. sec-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
12. tert-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
13. Carbon Disulfide	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
14. Carbon Tetrachloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
15. Chlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
16. Chloroethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
17. Chloroform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
18. Chloromethane	U	V-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
19. 2-Chlorotoluene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
‡ 20. 1,2-Dibromo-3-chloropropane (SIM)	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
21. Dibromochloromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
22. Dibromomethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
23. 1,2-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
24. 1,3-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
25. 1,4-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
26. Dichlorodifluoromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
27. 1,1-Dichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
28. 1,2-Dichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
29. 1,1-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
30. cis-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
31. trans-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
32. 1,2-Dichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
33. cis-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
34. trans-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
35. Ethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF
36. Ethylene Dibromide	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D05B	JMF

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**FIELDBLANK_040422**	Chain of Custody:	**201041**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/04/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Field**	Collect Time:	**11:45**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07755-001** **Matrix: Blank: Field**
Method: EPA 5030C/EPA 8260D **Description: FIELDBLANK_040422**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
37. 2-Hexanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
38. Isopropylbenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
39. 4-Methyl-2-pentanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
40. Methylene Chloride	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
‡ 41. 2-Methylnaphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
42. MTBE	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
43. Naphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
44. n-Propylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
45. Styrene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
46. 1,1,1,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
47. 1,1,2,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
48. Tetrachloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
49. Toluene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
50. 1,2,4-Trichlorobenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
51. 1,1,1-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
‡ 52. 1,1,2-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
53. Trichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
54. Trichlorofluoromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
55. 1,2,3-Trichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
‡ 56. 1,2,3-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
57. 1,2,4-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
58. 1,3,5-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
59. Vinyl Chloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
60. m&p-Xylene	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
61. o-Xylene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF
‡ 62. Xylenes	U		µg/L	3.0	1.0	04/05/22	VI22D05B	04/06/22 00:21	VI22D06B	JMF

Client Identification:	Arcadis U.S., Inc. - Novi	Sample Description:	OW-16D2_040422	Chain of Custody:	201041
Client Project Name:	TRW Milford ZF Active Safety (30046730)	Sample No:		Collect Date:	04/04/22
Client Project No:	30046730	Sample Matrix:	Ground Water	Collect Time:	11:55

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID:** A07755-002 **Matrix:** Ground Water
Method: EPA 5030C/EPA 8260D **Description:** OW-16D2_040422

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
1. Acetone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
‡ 2. Acrylonitrile	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
3. Benzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
4. Bromobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
5. Bromochloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
6. Bromodichloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
7. Bromoform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
8. Bromomethane	U	V-L-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
9. 2-Butanone	U		µg/L	25	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
10. n-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
11. sec-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
12. tert-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
13. Carbon Disulfide	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
14. Carbon Tetrachloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
15. Chlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
16. Chloroethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
17. Chloroform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
18. Chloromethane	U	V-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
19. 2-Chlorotoluene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
‡ 20. 1,2-Dibromo-3-chloropropane (SIM)	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
21. Dibromochloromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
22. Dibromomethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
23. 1,2-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
24. 1,3-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
25. 1,4-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
26. Dichlorodifluoromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
27. 1,1-Dichloroethane	3.5		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
28. 1,2-Dichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
29. 1,1-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
30. cis-1,2-Dichloroethene	19		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
31. trans-1,2-Dichloroethene	1.7		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
32. 1,2-Dichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
33. cis-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
34. trans-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
35. Ethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
36. Ethylene Dibromide	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**OW-16D2_040422**	Chain of Custody:	**201041**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/04/22**
Client Project No:	**30046730**	Sample Matrix:	**Ground Water**	Collect Time:	**11:55**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07755-002** **Matrix: Ground Water**
Method: EPA 5030C/EPA 8260D **Description: OW-16D2_040422**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
37. 2-Hexanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
38. Isopropylbenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
39. 4-Methyl-2-pentanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
40. Methylene Chloride	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
‡ 41. 2-Methylnaphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
42. MTBE	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
43. Naphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
44. n-Propylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
45. Styrene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
46. 1,1,1,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
47. 1,1,2,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
48. Tetrachloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
49. Toluene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
50. 1,2,4-Trichlorobenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
51. 1,1,1-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
‡ 52. 1,1,2-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
53. Trichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
54. Trichlorofluoromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
55. 1,2,3-Trichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
‡ 56. 1,2,3-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
57. 1,2,4-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
58. 1,3,5-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
59. Vinyl Chloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
60. m&p-Xylene	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
61. o-Xylene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF
‡ 62. Xylenes	U		µg/L	3.0	1.0	04/05/22	VI22D05B	04/06/22 02:59	VI22D05B	JMF

Client Identification:	Arcadis U.S., Inc. - Novi	Sample Description:	EQUIPMENTBLANK_040422	Chain of Custody:	201041
Client Project Name:	TRW Milford ZF Active Safety (30046730)	Sample No:		Collect Date:	04/04/22
Client Project No:	30046730	Sample Matrix:	Blank: Equipment	Collect Time:	12:10

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07755-003** **Matrix: Blank: Equipment**
Method: EPA 5030C/EPA 8260D **Description: EQUIPMENTBLANK_040422**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
1. Acetone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
‡ 2. Acrylonitrile	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
3. Benzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
4. Bromobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
5. Bromochloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
6. Bromodichloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
7. Bromoform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
8. Bromomethane	U	V-L-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
9. 2-Butanone	U		µg/L	25	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
10. n-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
11. sec-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
12. tert-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
13. Carbon Disulfide	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
14. Carbon Tetrachloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
15. Chlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
16. Chloroethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
17. Chloroform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
18. Chloromethane	U	V-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
19. 2-Chlorotoluene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
‡ 20. 1,2-Dibromo-3-chloropropane (SIM)	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
21. Dibromochloromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
22. Dibromomethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
23. 1,2-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
24. 1,3-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
25. 1,4-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
26. Dichlorodifluoromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
27. 1,1-Dichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
28. 1,2-Dichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
29. 1,1-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
30. cis-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
31. trans-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
32. 1,2-Dichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
33. cis-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
34. trans-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
35. Ethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF
36. Ethylene Dibromide	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 00:48	VI22D05B	JMF

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**EQUIPMENTBLANK_040422**	Chain of Custody:	**201041**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/04/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Equipment**	Collect Time:	**12:10**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07755-003** **Matrix: Blank: Equipment**
Method: EPA 5030C/EPA 8260D **Description: EQUIPMENTBLANK_040422**

						Preparation		Analysis		
Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	P. Date	P. Batch	A. Date	A. Batch	Init.
37. 2-Hexanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
38. Isopropylbenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
39. 4-Methyl-2-pentanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
40. Methylene Chloride	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
‡ 41. 2-Methylnaphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
42. MTBE	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
43. Naphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
44. n-Propylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
45. Styrene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
46. 1,1,1,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
47. 1,1,2,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
48. Tetrachloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
49. Toluene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
50. 1,2,4-Trichlorobenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
51. 1,1,1-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
‡ 52. 1,1,2-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
53. Trichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
54. Trichlorofluoromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
55. 1,2,3-Trichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
‡ 56. 1,2,3-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
57. 1,2,4-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
58. 1,3,5-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
59. Vinyl Chloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
60. m&p-Xylene	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
61. o-Xylene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF
‡ 62. Xylenes	U		µg/L	3.0	1.0	04/05/22	VI22D05B	04/05/22 00:48	VI22D05B	JMF

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**TRIP BLANK**	Chain of Custody:	**N/A**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/04/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Trip**	Collect Time:	**NA**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07755-004** **Matrix: Blank: Trip**
Method: EPA 5030C/EPA 8260D **Description: TRIP BLANK**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
1. Acetone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
‡ 2. Acrylonitrile	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
3. Benzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
4. Bromobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
5. Bromochloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
6. Bromodichloromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
7. Bromoform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
8. Bromomethane	U	V- L-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
9. 2-Butanone	U		µg/L	25	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
10. n-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
11. sec-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
12. tert-Butylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
13. Carbon Disulfide	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
14. Carbon Tetrachloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
15. Chlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
16. Chloroethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
17. Chloroform	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
18. Chloromethane	U	V-	µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
19. 2-Chlorotoluene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
‡ 20. 1,2-Dibromo-3-chloropropane (SIM)	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
21. Dibromochloromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
22. Dibromomethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
23. 1,2-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
24. 1,3-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
25. 1,4-Dichlorobenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
26. Dichlorodifluoromethane	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
27. 1,1-Dichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
28. 1,2-Dichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
29. 1,1-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
30. cis-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
31. trans-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
32. 1,2-Dichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
33. cis-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
34. trans-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
35. Ethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
36. Ethylene Dibromide	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**TRIP BLANK**	Chain of Custody:	**N/A**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/04/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Trip**	Collect Time:	**NA**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07755-004** **Matrix: Blank: Trip**
Method: EPA 5030C/EPA 8260D **Description: TRIP BLANK**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
37. 2-Hexanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
38. Isopropylbenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
39. 4-Methyl-2-pentanone	U		µg/L	50	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
40. Methylene Chloride	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
‡ 41. 2-Methylnaphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
42. MTBE	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
43. Naphthalene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
44. n-Propylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
45. Styrene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
46. 1,1,1,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
47. 1,1,2,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
48. Tetrachloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
49. Toluene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
50. 1,2,4-Trichlorobenzene	U		µg/L	5.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
51. 1,1,1-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
‡ 52. 1,1,2-Trichloroethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
53. Trichloroethene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
54. Trichlorofluoromethane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
55. 1,2,3-Trichloropropane	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
‡ 56. 1,2,3-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
57. 1,2,4-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
58. 1,3,5-Trimethylbenzene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
59. Vinyl Chloride	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
60. m&p-Xylene	U		µg/L	2.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
61. o-Xylene	U		µg/L	1.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF
‡ 62. Xylenes	U		µg/L	3.0	1.0	04/05/22	VI22D05B	04/06/22 01:14	VI22D05B	JMF

Definitions/ Qualifiers:

A: Spike recovery or precision unusable due to dilution.
B: The analyte was detected in the associated method blank.
E: The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
J: The concentration is an estimated value.
M: Modified Method
U: The analyte was not detected at or above the reporting limit.
X: Matrix interference has resulted in a raised reporting limit or distorted result.
W: Results reported on a wet-weight basis.
***:** Value reported is outside QC limits

Exception Summary:

L- : Recovery in the associated laboratory sample (LCS) exceeds the lower control limit. Results may be biased low.
V- : Recovery in the associated continuing calibration verification sample (CCV) exceeds the lower control limit. Results may be biased low.

Analysis Locations:

All analyses performed in Holt.

NELAP ACCREDITED TNI LABORATORY

Accreditation Number(s):

T104704518-19-8 (TX)

VI22D05B: Method Blank (MB)

EPA 8260D

Run Time: VI22D05B.MB 04/05/2022 23:54 [VI22D05B]

Analyte	MB Result	MB Qualifier	MB RDL
	µg/L		µg/L
Acetone	U		50
Acrylonitrile	U		2.0
Benzene	U		1.0
Bromobenzene	U		1.0
Bromochloromethane	U		1.0
Bromodichloromethane	U		1.0
Bromoform	U		1.0
Bromomethane	U		5.0
2-Butanone	U		25
n-Butylbenzene	U		1.0
sec-Butylbenzene	U		1.0
tert-Butylbenzene	U		1.0
Carbon Disulfide	U		5.0
Carbon Tetrachloride	U		1.0
Chlorobenzene	U		1.0
Chloroethane	U		5.0
Chloroform	U		1.0
Chloromethane	U		5.0
2-Chlorotoluene	U		5.0
1,2-Dibromo-3-chloropropane (SIM)	U		1.0
Dibromochloromethane	U		5.0
Dibromomethane	U		5.0
1,2-Dichlorobenzene	U		1.0
1,3-Dichlorobenzene	U		1.0
1,4-Dichlorobenzene	U		1.0
Dichlorodifluoromethane	U		5.0
1,1-Dichloroethane	U		1.0
1,2-Dichloroethane	U		1.0
1,1-Dichloroethene	U		1.0
cis-1,2-Dichloroethene	U		1.0
trans-1,2-Dichloroethene	U		1.0
1,2-Dichloropropane	U		1.0
cis-1,3-Dichloropropene	U		0.50

VI22D05B: Method Blank (MB)

EPA 8260D

Run Time: VI22D05B.MB 04/05/2022 23:54 [VI22D05B]

Analyte	MB Result	MB Qualifier	MB RDL
	µg/L		µg/L
trans-1,3-Dichloropropene	U		0.50
Ethylbenzene	U		1.0
Ethylene Dibromide	U		1.0
2-Hexanone	U		50
Isopropylbenzene	U		5.0
4-Methyl-2-pentanone	U		50
Methylene Chloride	U		5.0
2-Methylnaphthalene	U		5.0
MTBE	U		5.0
Naphthalene	U		5.0
n-Propylbenzene	U		1.0
Styrene	U		1.0
1,1,1,2-Tetrachloroethane	U		1.0
1,1,2,2-Tetrachloroethane	U		1.0
Tetrachloroethene	U		1.0
Toluene	U		1.0
1,2,4-Trichlorobenzene	U		5.0
1,1,1-Trichloroethane	U		1.0
1,1,2-Trichloroethane	U		1.0
Trichloroethene	U		1.0
Trichlorofluoromethane	U		1.0
1,2,3-Trichloropropane	U		1.0
1,2,3-Trimethylbenzene	U		1.0
1,2,4-Trimethylbenzene	U		1.0
1,3,5-Trimethylbenzene	U		1.0
Vinyl Chloride	U		1.0
m&p-Xylene	U		2.0
o-Xylene	U		1.0
4-Bromofluorobenzene(S)	*100*		*80-120*
Dibromofluoromethane(S)	*101*		*80-120*
1,2-Dichloroethane-d4(S)	*94*		*80-120*
Toluene-d8(S)	*99*		*80-120*

VI22D05B: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

EPA 8260D

Run Time: VI22D05B.LCS: 04/05/2022 22:09 [VI22D05B] VI22D05B.LCSD: 04/05/2022 22:36 [VI22D05B]

Analyte	LCS Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier	LCSD Spike Amount	LCSD Result	LCSD Rec.	LCSD Qualifier	RPD	RPD Limits	RPD Qualifier
	µg/L	µg/L	%	%		µg/L	µg/L	%		%	%	
Acetone	50.0	30.6	61	54-140		50.0	31.1	62		2	20	
Acrylonitrile	50.0	52.7	105	70-130		50.0	53.7	107		2	20	
Benzene	50.0	45.5	93	80-120		50.0	45.1	90		3	20	
Bromobenzene	50.0	44.7	89	75-125		50.0	44.2	88		1	20	
Bromochloromethane	50.0	40.7	81	70-130		50.0	40.1	80		1	20	
Bromodichloromethane	50.0	44.5	89	75-120		50.0	43.5	87		2	20	
Bromoform	50.0	45.9	92	70-130		50.0	45.4	91		1	20	
Bromomethane	50.0	27.5	55	69-135	*	50.0	29.1	58	*	5	20	
2-Butanone	50.0	40.1	80	70-148		50.0	40.5	81		1	20	
n-Butylbenzene	50.0	52.8	106	70-133		50.0	51.9	104		2	20	
sec-Butylbenzene	50.0	50.2	100	70-125		50.0	49.4	99		1	20	
tert-Butylbenzene	50.0	49.5	99	70-130		50.0	48.6	97		2	20	
Carbon Disulfide	50.0	44.6	89	70-130		50.0	42.8	86		3	20	
Carbon Tetrachloride	50.0	44.5	89	70-130		50.0	43.3	87		2	20	
Chlorobenzene	50.0	45.9	92	80-120		50.0	44.8	90		2	20	
Chloroethane	50.0	40.5	81	61-130		50.0	39.1	78		4	20	
Chloroform	50.0	44.2	88	80-120		50.0	43.4	87		1	20	
Chloromethane	50.0	38.4	77	67-125		50.0	38.9	78		1	20	
2-Chlorotoluene	50.0	47.3	95	75-125		50.0	46.6	93		2	20	
1,2-Dibromo-3-chloropropane (SIM)	50.0	48.5	97	70-130		50.0	49.6	99		2	20	
Dibromochloromethane	50.0	44.6	89	70-130		50.0	43.3	87		2	20	
Dibromomethane	50.0	41.6	83	75-125		50.0	40.4	81		2	20	
1,2-Dichlorobenzene	50.0	46.9	94	70-120		50.0	46.2	92		2	20	
1,3-Dichlorobenzene	50.0	45.8	92	75-125		50.0	45.0	90		2	20	
1,4-Dichlorobenzene	50.0	43.3	87	75-125		50.0	42.5	85		2	20	
Dichlorodifluoromethane	50.0	53.5	107	70-136		50.0	51.0	102		5	20	
1,1-Dichloroethane	50.0	45.9	92	70-130		50.0	44.5	89		3	20	
1,2-Dichloroethane	50.0	40.9	82	70-130		50.0	39.7	79		4	20	
1,1-Dichloroethene	50.0	43.8	88	79-120		50.0	42.1	84		5	20	
cis-1,2-Dichloroethene	50.0	44.8	90	70-125		50.0	43.2	86		5	20	
trans-1,2-Dichloroethene	50.0	44.5	89	70-130		50.0	43.5	87		2	20	
1,2-Dichloropropane	50.0	49.1	98	80-121		50.0	47.4	95		3	20	
cis-1,3-Dichloropropene	50.0	43.4	87	70-130		50.0	42.2	84		4	20	

VI22D05B: Laboratory Control Sample (LCS)/Laboratory Control Sample Duplicate (LCSD)

EPA 8260D

Run Time: VI22D05B.LCS: 04/05/2022 22:09 [VI22D05B] VI22D05B.LCSD: 04/05/2022 22:35 [VI22D05B]

Analyte	LCS Spike Amount	LCS Result	LCS Rec.	Rec. Limits	LCS Qualifier	LCSD Spike Amount	LCSD Result	LCSD Rec.	LCSD Qualifier	RPD	RPD Limits	RPD Qualifier
	µg/L	µg/L	%	%		µg/L	µg/L	%		%	%	
trans-1,3-Dichloropropene	50.0	48.2	96	70-132		50.0	45.7	93		3	20	
Ethylbenzene	50.0	48.4	97	80-120		50.0	47.0	94		3	20	
Ethylene Dibromide	50.0	45.2	90	80-120		50.0	44.4	89		1	20	
2-Hexanone	50.0	39.4	79	70-130		50.0	40.5	81		3	20	
Isopropylbenzene	50.0	48.7	97	75-125		50.0	47.5	95		2	20	
4-Methyl-2-pentanone	50.0	55.2	110	70-130		50.0	54.7	109		1	20	
Methylene Chloride	50.0	43.8	88	70-130		50.0	42.7	85		3	20	
2-Methylnaphthalene	50.0	46.0	92	70-130		50.0	46.5	93		1	20	
MTBE	50.0	48.3	97	70-125		50.0	47.3	95		2	20	
Naphthalene	50.0	46.7	93	70-130		50.0	47.5	95		2	20	
n-Propylbenzene	50.0	49.4	99	70-130		50.0	48.8	98		1	20	
Styrene	50.0	41.0	82	70-130		50.0	39.7	79		4	20	
1,1,1,2-Tetrachloroethane	50.0	46.7	93	80-130		50.0	45.2	90		3	20	
1,1,2,2-Tetrachloroethane	50.0	59.4	119	70-130		50.0	60.5	121		2	20	
Tetrachloroethene	50.0	48.5	97	70-130		50.0	45.9	94		3	20	
Toluene	50.0	47.9	96	80-120		50.0	46.4	93		3	20	
1,2,4-Trichlorobenzene	50.0	45.9	92	70-130		50.0	46.0	92		0	20	
1,1,1-Trichloroethane	50.0	45.5	91	70-130		50.0	44.3	89		2	20	
1,1,2-Trichloroethane	50.0	47.6	95	75-125		50.0	47.1	94		1	20	
Trichloroethene	50.0	41.6	83	71-125		50.0	39.9	80		4	20	
Trichlorofluoromethane	50.0	48.2	96	70-133		50.0	46.6	93		3	20	
1,2,3-Trichloropropane	50.0	49.9	100	75-125		50.0	49.3	99		1	20	
1,2,3-Trimethylbenzene	50.0	47.0	94	70-130		50.0	46.2	92		2	20	
1,2,4-Trimethylbenzene	50.0	49.1	98	75-130		50.0	48.7	97		1	20	
1,3,5-Trimethylbenzene	50.0	49.1	98	75-130		50.0	48.1	96		2	20	
Vinyl Chloride	50.0	43.9	88	74-125		50.0	42.2	84		5	20	
m&p-Xylene	100	95.1	95	75-130		100	92.8	93		2	20	
o-Xylene	50.0	47.9	96	80-120		50.0	46.3	93		3	20	
4-Bromofluorobenzene(S)			*100*	*80-120*				*101*				
Dibromofluoromethane(S)			*99*	*80-120*				*99*				
1,2-Dichloroethane-d4(S)			*91*	*80-120*				*90*				
Toluene-d8(S)			*100*	*80-120*				*100*				

Definitions/ Qualifiers:

U: The analyte was not detected at or above the Reporting Limit (RL).
*: Value reported is outside QC limits

Exception Summary:

Exceptions have been properly noted on reported results or affected samples have been scheduled for reanalysis when appropriate.

Report Generated By:

Sue Ridletts

By Sue Ridletts at 12:32 PM, Apr 06, 2022

Fibertec environmental services

Analytical Laboratory
1914 Holloway Drive
Holt, MI 48842
Phone: 517 699 0345
Fax: 517 699 0388
email: lab@fibertec.us

8660 S. Mackinaw Trail
Cadillac, MI 49601
Phone: 231 775 8368
Fax: 231 775 8584

Geoprobe
11766 E. Grand River Rd.
Brighton, MI 48116
Phone: 810 220 3300
Fax: 810 220 3311

Chain of Custody #
201041
PAGE 1 of 1

Client Name: Arcadis
Contact Person: Marina Samp
Project Name/ Number: TRW Milford 30046730
Email distribution list: marina.samp@arcadis.com
john.mcinnis@arcadis.com
Quote #
Purchase Order# 30046730.000IZ

Date	Time	Sample #	Client Sample Descriptor	MATRIX (see matrix codes for code)	# OF CONTAINERS	VOCs 8260B										HOLD SAMPLE
4.4.22	1145		FIELDBLANK_040422	GW	3	3										
4.4.22	1155		OW-16D2-040422	GW	3	3										
4.4.22	1210		EQUIPMENTBLANK_040422	GW	3	3										

PARAMETERS

Matrix Code: S Soil; GW Ground Water; A Air; SW Surface Water; O Oil; WW Waste Water; P Wipe; X Other: Specify

Deliverables: X Level 2; Level 3; Level 4; X EDD

Remarks:

Received By Lab
APR 04 2022
initials ET

Received On Ice

Comments:

Sampled/Relinquished By: Stacey Hannula	Date/ Time 4.4.22 1230	Received By: Anyssa Mandich/Arcadis
Relinquished By: Anyssa Mandich/Arcadis	Date/ Time 4/4/22 1415	Received By: Fibertec
Relinquished By:	Date/ Time	Received By Laboratory:

Turnaround Time ALL RESULTS WILL BE SENT BY THE END OF THE BUSINESS DAY

_____1 bus. day X 2 bus. day (48 hrs) _____3 bus. days _____4 bus. days

_____5-7 bus. days (standard) Other (specify time/date requirement): _____

LAB USE ONLY

Fibertec project number: A07755

Temperature upon receipt at Lab: 2.0°C

Please see back for terms and conditions

EXHBIT 2

April 13, 2022 - Letter RE: Additional Information for Consideration by EGLE

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

Department Health Safety andEnvironmental
From Robert Bleazard
Phone +1 480 722-4866
Email Robert.Bleazard@zf.com
Date April 13, 2022

VIA E-MAIL TO: WojchiechowskiK@Michigan.gov

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. Additional Information for Consideration by Michigan Department of Environment, Great Lakes, and Energy Related to Administrative Order for Response Activity; EGLE Docket No. AO-RRD-22-001.

Dear Mr. Wojciechowski,

ZF Active Safety US Inc. (ZF) is submitting the following information and attachment to the Department of Environment, Great Lakes, and Energy (EGLE) with respect to the Administrative Order for Response Activity (AO) issued by EGLE to ZF, with respect to the former Kelsey-Hayes site in Milford, Michigan (the "Site").

As noted in the letter that ZF sent to EGLE on April 8, 2022, Arcadis recently began redevelopment activities on monitoring well OW-16D2 on April 1st and subsequently collected samples from the well on April 4th and April 8th. The sample collected on April 8th was submitted to Fibertec and 48-hour turn-around-time was again requested. The groundwater sample result from OW-16D2 is again non-detect (less than 1 microgram per liter) for vinyl chloride. See attached Laboratory Report.

Our April 8th letter details the reasons why ZF and Arcadis suspected OW-16D2 may be compromised and describes the measures we took to further examine and redevelop the well on April 1st. The April 8th sample results collected one week following the redevelopment of OW-16D2 are consistent with, and further support our understanding that, OW-16D2 had become compromised and sample results obtained from the well prior to the redevelopment are not reliable because they were not representative of groundwater conditions. Specifically, the non-detect vinyl chloride results for now two consecutive post-redevelopment sampling events, coupled with the other chlorinated volatile organic compounds (CVOCs) that were detected in OW-16D2 below drinking water criteria at concentrations consistent with previous results, confirms that dissolved CVOCs present in groundwater in the vicinity of OW-16D2 are stable and not degrading to vinyl chloride, which is consistent with the sampling results throughout ZF's monitoring well network over the past 25 years.

The hydraulic observations presented in our April 8th letter clearly show that the well was unable to sustain low-flow purging. Stagnant water was removed during the redevelopment work and the resultant recharge into the well was inflow from the surrounding formation. In addition to the CVOC analytical results and hydraulic observations, it was noted during the April 8th sampling that drawdown was improved versus pre-redevelopment conditions and other parameters (i.e., dissolved oxygen, oxidation-reduction potential) were stable. Collectively, these multiple lines of evidence are indicating the well is now producing more representative groundwater samples than it was prior to the redevelopment. ZF and Arcadis believe that the initial redevelopment work completed on OW-16D2 meets the objective of improving hydraulic communication between the well and the formation and the well conditions are currently producing more accurate groundwater samples.

Based on these observations and the April 8th sample that detected no vinyl chloride, it appears that the vinyl chloride that had been detected in OW-16D2 prior to the recent well redevelopment action was the result of stagnant water within the well and not representative of true groundwater conditions. At this point, there is an objectively reasonable basis and enough technical evidence to say that EGLE should not rely on the samples collected from OW-16D2 prior to redevelopment of the well to make a determination that this well poses an imminent and substantial endangerment to the Village of Milford municipal wells. More work is necessary to further evaluate OW-16D2, including additional redevelopment activities, and this work will require additional time beyond the current April 15th compliance date in the AO.

Given that the sole basis for the corrective action work set forth in the AO is the detection of vinyl chloride in recent samples now understood to be consisting of stagnant water collected from OW-16D2 in a compromised condition, it would be reasonable and consistent with applicable laws and regulations for EGLE to provide ZF an extension of the compliance date in the AO in order to submit a work plan for additional well redevelopment activities, allow ZF time to implement the work plan, and further evaluate and discuss the work plan results and any necessary corrective actions with EGLE. Therefore, ZF will submit a detailed work plan to EGLE by **no later than April 22nd**, which will include plans for routine additional sampling of OW-16D2, and information regarding further mechanical and additive techniques to rehabilitate OW-16D2 or replace it.

Furthermore, a **60-day extension of the AO response deadline** will allow ZF time to implement the work plan and provide the parties time to review and discuss the work plan results. This additional information will enable the parties to reasonably act on an understanding based on representative data and objectively developed technical information about the integrity of OW-16D2, rather than presumptions about the recent appearance of vinyl chloride in only one well that has been determined to be compromised and was not yielding samples representative of the groundwater in that location before redevelopment. Furthermore, if EGLE is concerned about vinyl chloride appearing in the Village of Milford municipal well during the extension of the AO notice deadline, ZF's understanding based on the Focused Feasibility Study Report prepared by Wood for the Village of Milford is that the current Iron Removal System provides a feasible temporary response measure that could be utilized to remove vinyl chloride at the levels consistent with those previously reported in OW-16D2, if it were to be needed.

In light of the tight timing circumstances, we ask that EGLE please communicate to ZF prior to April 15th whether or not EGLE agrees with ZF's proposed submission of a work plan by no later than April 22nd and with a 60-day extension of the AO response deadline.

Thank you for your attention to these matters and please include this letter and its attachment in the administrative record for the AO and the Site.

If you have any questions, please feel free to contact me at the phone number listed in the header on the first page of this letter, Mr. Scott Detwiler – ZF Project Manager at 480-722-4139, or Mr. John McInnis of Arcadis at 248-994-2285.

Sincerely,

Robert A Bleazard

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
USA
Phone: +1 734 855-2600
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Enclosure
cc by email only:

Mr. Scott Detwiler, ZF
Ms. Kelly Martorano, ZF
Mr. John McInnis, Arcadis
Mr. Troy Sclafani, Arcadis
Mr. Grant Gilezan, Dykema
Mr. Paul Stewart, Dykema
Mr. Christian Wuerth, Village Manager, Village of Milford
Ms. Polly Synk, Michigan Department of Attorney General
Ms. Danielle Allison-Yokom, Michigan Department of Attorney General
Mr. Aaron B. Keatley, EGLE - Chief Deputy Director, EGLE
Mr. Mike Neller, EGLE - Remediation and Redevelopment Director
Mr. Josh Mosher, EGLE – Remediation and Redevelopment Assistant Director
Mr. Dan Yordanich, EGLE
Ms. Mary Miller, EGLE
Mr. Darren Bowling, EGLE
Mr. Paul Owens, EGLE
Ms. Cheryl Wilson, EGLE
Ms. Lyndsey Hagy, EGLE
Ms. Katie Noetzel, EGLE

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ATTACHMENT

Fibertec
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services

Tuesday, April 12, 2022

Fibertec Project Number:	A07873
Project Identification:	TRW Milford ZF Active Safety (30046730) /30046730
Submittal Date:	04/08/2022

Mrs. Marina Samp
Arcadis U.S., Inc. - Novi
28550 Cabot Drive
Suite 500
Novi, MI 48377

Dear Mrs. Samp,

Thank you for selecting Fibertec Environmental Services as your analytical laboratory. The samples you submitted have been analyzed in accordance with NELAC standards and the results compiled in the attached report. Any exceptions to NELAC compliance are noted in the report. These results apply only to those samples submitted. Please note TO-15 samples will be disposed of 7 calendar days after the reporting date. All other samples will be disposed of 30 days after the reporting date.

If you have any questions regarding these results or if we may be of further assistance to you, please contact me at (517) 699-0345.

Sincerely,

Sue Ricketts

By Sue Ricketts at 1:11 PM, Apr 12, 2022

For Daryl P. Strandbergh
Laboratory Director

Enclosures

Fibertec environmental services

Analytical Laboratory Report
Laboratory Project Number: A07873
Laboratory Sample Number: A07873-001

Order: A07873
Date: 04/12/22

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**Field Blank-040822**	Chain of Custody:	**207003**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/08/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Field**	Collect Time:	**10:35**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07873-001** **Matrix: Blank: Field**
Method: EPA 5030C/EPA 8260D **Description: Field Blank-040822**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
1. Acetone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
‡ 2. Acrylonitrile	U		µg/L	2.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
3. Benzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
4. Bromobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
5. Bromochloromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
6. Bromodichloromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
7. Bromoform	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
8. Bromomethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
9. 2-Butanone	U		µg/L	25	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
10. n-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
11. sec-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
12. tert-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
13. Carbon Disulfide	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
14. Carbon Tetrachloride	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
15. Chlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
16. Chloroethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
17. Chloroform	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
18. Chloromethane	U	V+ L+	µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
19. 2-Chlorotoluene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
‡ 20. 1,2-Dibromo-3-chloropropane (SIM)	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
21. Dibromochloromethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
22. Dibromomethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
23. 1,2-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
24. 1,3-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
25. 1,4-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
26. Dichlorodifluoromethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
27. 1,1-Dichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
28. 1,2-Dichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
29. 1,1-Dichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
30. cis-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
31. trans-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
32. 1,2-Dichloropropane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
33. cis-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
34. trans-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
35. Ethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
36. Ethylene Dibromide	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM

1914 Holloway Drive, Holt, MI 48842, T: (517) 699-0345, F: (517) 699-0388
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lab@fibertec.us

Fibertec environmental services

Analytical Laboratory Report
Laboratory Project Number: A07873
Laboratory Sample Number: A07873-001

Order: A07873
Date: 04/12/22

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**Field Blank-040822**	Chain of Custody:	**207003**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/08/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Field**	Collect Time:	**10:35**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07873-001** **Matrix: Blank: Field**
Method: EPA 5030C/EPA 8260D **Description: Field Blank-040822**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
37. 2-Hexanone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
38. Isopropylbenzene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
39. 4-Methyl-2-pentanone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
40. Methylene Chloride	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
‡ 41. 2-Methylnaphthalene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
42. MTBE	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
43. Naphthalene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
44. n-Propylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
45. Styrene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
46. 1,1,1,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
47. 1,1,2,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
48. Tetrachloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
49. Toluene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
50. 1,2,4-Trichlorobenzene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
51. 1,1,1-Trichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
‡ 52. 1,1,2-Trichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
53. Trichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
54. Trichlorofluoromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
55. 1,2,3-Trichloropropane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
‡ 56. 1,2,3-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
57. 1,2,4-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
58. 1,3,5-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
59. Vinyl Chloride	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
60. m&p-Xylene	U		µg/L	2.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
61. o-Xylene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM
‡ 62. Xylenes	U		µg/L	3.0	1.0	04/11/22	VB22D11B	04/11/22 19:06	VB22D11B	KCM

Fibertec environmental services

Analytical Laboratory Report
Laboratory Project Number: A07873
Laboratory Sample Number: A07873-002

Order: A07873
Date: 04/12/22

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**OW-16D2-040822**	Chain of Custody:	**207003**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/08/22**
Client Project No:	**30046730**	Sample Matrix:	**Ground Water**	Collect Time:	**11:35**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID:** A07873-002 **Matrix:** Ground Water
Method: EPA 5030C/EPA 8260D **Description:** OW-16D2-040822

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
1. Acetone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
‡ 2. Acrylonitrile	U		µg/L	2.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
3. Benzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
4. Bromobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
5. Bromochloromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
6. Bromodichloromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
7. Bromoform	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
8. Bromomethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
9. 2-Butanone	U		µg/L	25	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
10. n-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
11. sec-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
12. tert-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
13. Carbon Disulfide	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
14. Carbon Tetrachloride	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
15. Chlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
16. Chloroethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
17. Chloroform	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
18. Chloromethane	U	V-L-	µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
19. 2-Chlorotoluene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
‡ 20. 1,2-Dibromo-3-chloropropane (SIM)	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
21. Dibromochloromethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
22. Dibromomethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
23. 1,2-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
24. 1,3-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
25. 1,4-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
26. Dichlorodifluoromethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
27. 1,1-Dichloroethane	3.5		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
28. 1,2-Dichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
29. 1,1-Dichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
30. cis-1,2-Dichloroethene	20		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
31. trans-1,2-Dichloroethene	1.5		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
32. 1,2-Dichloropropane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
33. cis-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
34. trans-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
35. Ethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
36. Ethylene Dibromide	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM

Fibertec environmental services

Analytical Laboratory Report
Laboratory Project Number: A07873
Laboratory Sample Number: A07873-002

Order: A07873
Date: 04/12/22

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**OW-16D2-040822**	Chain of Custody:	**207003**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/08/22**
Client Project No:	**30046730**	Sample Matrix:	**Ground Water**	Collect Time:	**11:35**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07873-002** **Matrix: Ground Water**
Method: EPA 5030C/EPA 8260D **Description: OW-16D2-040822**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
37. 2-Hexanone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
38. Isopropylbenzene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
39. 4-Methyl-2-pentanone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
40. Methylene Chloride	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
‡ 41. 2-Methylnaphthalene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
42. MTBE	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
43. Naphthalene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
44. n-Propylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
45. Styrene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
46. 1,1,1,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
47. 1,1,2,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
48. Tetrachloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
49. Toluene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
50. 1,2,4-Trichlorobenzene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
51. 1,1,1-Trichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
‡ 52. 1,1,2-Trichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
53. Trichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
54. Trichlorofluoromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
55. 1,2,3-Trichloropropane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
‡ 56. 1,2,3-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
57. 1,2,4-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
58. 1,3,5-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
59. Vinyl Chloride	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
60. m&p-Xylene	U		µg/L	2.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
61. o-Xylene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM
‡ 62. Xylenes	U		µg/L	3.0	1.0	04/11/22	VB22D11B	04/11/22 20:00	VB22D11B	KCM

Fibertec environmental services

Analytical Laboratory Report
Laboratory Project Number: A07873
Laboratory Sample Number: A07873-003

Order: A07873
Date: 04/12/22

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**Trip Blank**	Chain of Custody:	**207003**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/08/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Trip**	Collect Time:	**NA**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07873-003** **Matrix: Blank: Trip**
Method: EPA 5030C/EPA 8260D **Description: Trip Blank**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
1. Acetone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
‡ 2. Acrylonitrile	U		µg/L	2.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
3. Benzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
4. Bromobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
5. Bromochloromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
6. Bromodichloromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
7. Bromoform	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
8. Bromomethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
9. 2-Butanone	U		µg/L	25	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
10. n-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
11. sec-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
12. tert-Butylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
13. Carbon Disulfide	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
14. Carbon Tetrachloride	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
15. Chlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
16. Chloroethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
17. Chloroform	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
18. Chloromethane	U	V+ L+	µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
19. 2-Chlorotoluene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
‡ 20. 1,2-Dibromo-3-chloropropane (SIM)	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
21. Dibromochloromethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
22. Dibromomethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
23. 1,2-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
24. 1,3-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
25. 1,4-Dichlorobenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
26. Dichlorodifluoromethane	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
27. 1,1-Dichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
28. 1,2-Dichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
29. 1,1-Dichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
30. cis-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
31. trans-1,2-Dichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
32. 1,2-Dichloropropane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
33. cis-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
34. trans-1,3-Dichloropropene	U		µg/L	0.50	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
35. Ethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
36. Ethylene Dibromide	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM

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11766 E. Grand River, Brighton, MI 48116, T: (810) 220-3300, F: (810) 220-3311
8660 S. Mackinaw Trail, Cadillac, MI 49601, T: (231) 775-8368, F: (231) 775-8584
lab@fibertec.us

Fibertec environmental services

Analytical Laboratory Report
Laboratory Project Number: A07873
Laboratory Sample Number: A07873-003

Order: A07873
Date: 04/12/22

Client Identification:	**Arcadis U.S., Inc. - Novi**	Sample Description:	**Trip Blank**	Chain of Custody:	**207003**
Client Project Name:	**TRW Milford ZF Active Safety (30046730)**	Sample No:		Collect Date:	**04/09/22**
Client Project No:	**30046730**	Sample Matrix:	**Blank: Trip**	Collect Time:	**NA**

Sample Comments:

Definitions: Q: Qualifier (see definitions at end of report) NA: Not Applicable ‡: Parameter not included in NELAC Scope of Analysis.

Volatile Organic Compounds (VOCs) by GC/MS **Aliquot ID: A07873-003** **Matrix: Blank: Trip**
Method: EPA 5030C/EPA 8260D **Description: Trip Blank**

Parameter(s)	Result	Q	Units	Reporting Limit	Dilution	Preparation P. Date	Preparation P. Batch	Analysis A. Date	Analysis A. Batch	Init.
37. 2-Hexanone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
38. Isopropylbenzene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
39. 4-Methyl-2-pentanone	U		µg/L	50	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
40. Methylene Chloride	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
‡ 41. 2-Methylnaphthalene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
42. MTBE	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
43. Naphthalene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
44. n-Propylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
45. Styrene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
46. 1,1,1,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
47. 1,1,2,2-Tetrachloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
48. Tetrachloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
49. Toluene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
50. 1,2,4-Trichlorobenzene	U		µg/L	5.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
51. 1,1,1-Trichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
‡ 52. 1,1,2-Trichloroethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
53. Trichloroethene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
54. Trichlorofluoromethane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
55. 1,2,3-Trichloropropane	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
‡ 56. 1,2,3-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
57. 1,2,4-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
58. 1,3,5-Trimethylbenzene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
59. Vinyl Chloride	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
60. m&p-Xylene	U		µg/L	2.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
61. o-Xylene	U		µg/L	1.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM
‡ 62. Xylenes	U		µg/L	3.0	1.0	04/11/22	VB22D11B	04/11/22 19:33	VB22D11B	KCM

Definitions/ Qualifiers:

- **A:** Spike recovery or precision unusable due to dilution.
- **B:** The analyte was detected in the associated method blank.
- **E:** The analyte was detected at a concentration greater than the calibration range, therefore the result is estimated.
- **J:** The concentration is an estimated value.
- **M:** Modified Method
- **U:** The analyte was not detected at or above the reporting limit.
- **X:** Matrix interference has resulted in a raised reporting limit or distorted result.
- **W:** Results reported on a wet-weight basis.
- ***:** Value reported is outside QC limits

Exception Summary:

- **L+** : Recovery in the associated laboratory sample (LCS) exceeds the upper control limit. Results may be biased high.
- **V+** : Recovery in the associated continuing calibration verification sample (CCV) exceeds the upper control limit. Results may be biased high.

Analysis Locations:

All analyses performed in Holt.

Accreditation Number(s):

T104704518-19-8 (TX)

EXHIBIT 3

April 14, 2022 - EGLE Response to ZF April 8 and April 13, 2022 Letters RE: Additional Information for Consideration

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

GRETCHEN WHITMER
GOVERNOR

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
Mary Miller, EGLE
Dan Yordanich, EGLE
Paul Owens, EGLE
Darren Bowling, EGLE
Cheryl Wilson, EGLE
Tiffany Yusko-Kotimko, EGLE
Kevin Wojciechowski, EGLE
Lyndsey Hagy, EGLE
Katie Noetzel, EGLE

EXHIBIT 4

November 23, 2021 - ZF Response to EGLE Compliance Communication

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

VIA EMAIL: WojciechowskiK@Michigan.gov
AND CERTIFIED MAIL

Department Health Safety andEnvironmental
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.

ZF Active Safety US Inc.
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Livonia, Michigan 48150-2122
USA
Phone: +1 734 855-2600
www.zf.com

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.

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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.

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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.

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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 EGLE[1] 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).

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- 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.

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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.

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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.

.

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Sincerely,

ZF Active Safety US Inc.

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

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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 Karll
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 Karll <mkarll@villageofmilford.org>
Subject: RE: Monitoring Well 16D2 Sampling

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
Remediation Redevelopment Division
Warren District Office
Cell: 586-623-2948
wojciechowskik@michigan.gov
Pollution Emergency Alerting System: 1-800-292-4706

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

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 Karll
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 Karll
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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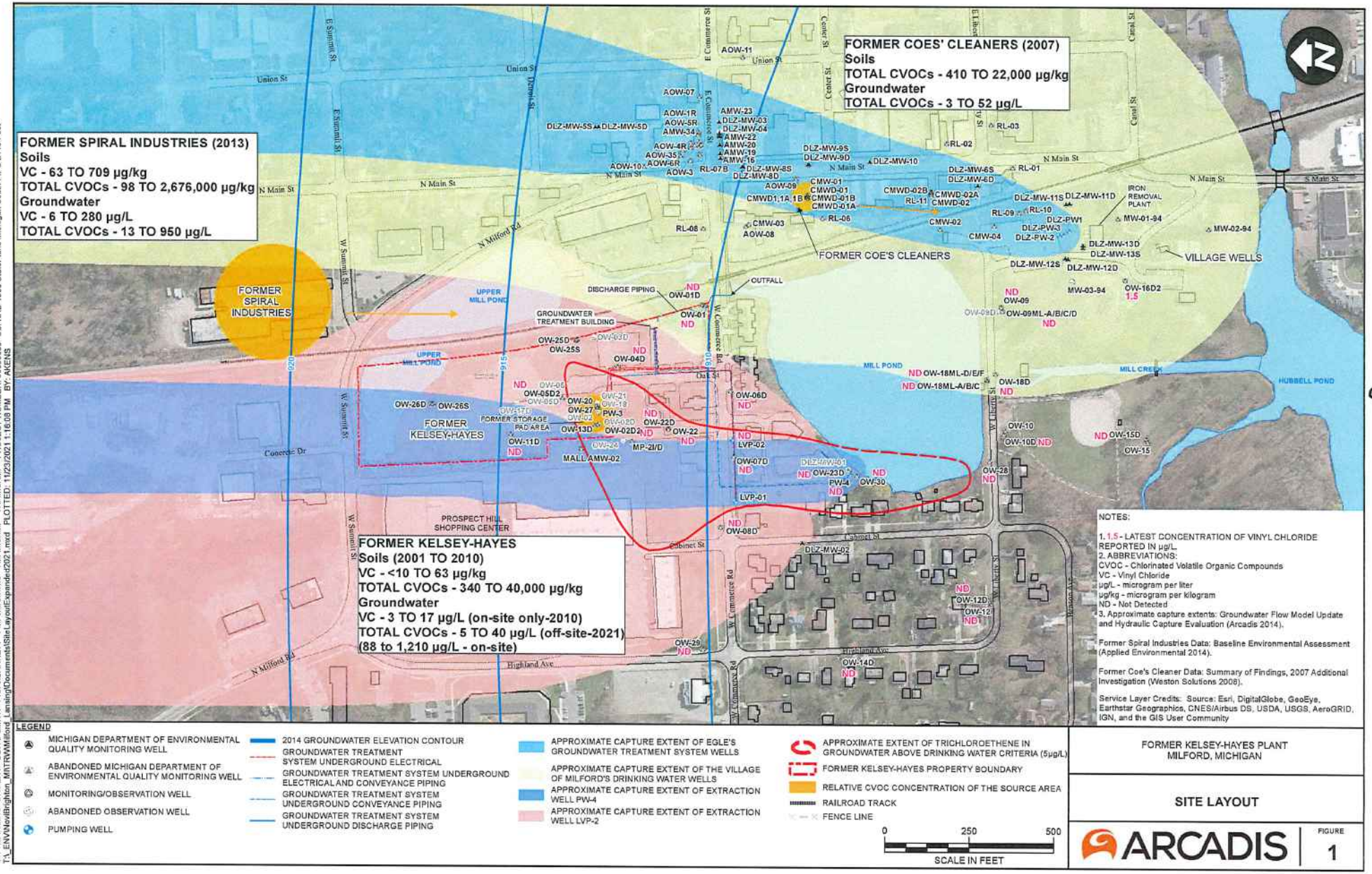

FORMER KELSEY-HAYES PLANT
MILFORD, MICHIGAN

SITE LAYOUT

ARCADIS

FIGURE 1

CITY:LANSING DIV: ENV DB: A. SMITH PIC: J.BARRETT PM: J.MCINNIS TM: M.SAMP TR: M.SAMP PROJECT NUMBER: 30083633 CS: NAD 1983 StatePlane Michigan South FIPS 2113 Feet
T:_ENV\NoviBrighton_MNTRWM\Milford_Lansing\Documents\SiteLayoutExpanded2021.mxd PLOTTED: 11/23/2021 1:16:08 PM BY: AKENS

Figure 1

MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY
REMEDIATION AND REDEVELOPMENT DIVISION
PO BOX 30426, LANSING, MICHIGAN 48909-7926

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	☐	20b(2)Site Specific Criteria	☐
Evaluation Plan	☒	*(modification of generic criteria)*	
Feasibility Study	☐	20b(3) Site Specific Criteria or Surrogate	☐
Remedial Action Plan	☐	*(no generic criteria available)*	
Interim Response Plan	☐	Section 20118(4) and (5) Request	☐
Mixing Zone Request	☐	Land or Resource Use Restrictions	☐
20e(14) De Minimus GSI Impact	☐	Other, Specify:	☐

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

Section C: Facility and Locational Information:

Facility Name: Former Kelsey-Hayes Plant Property

Street Address of Property: 101 Oak Street

City: Milford State: Michigan Zip: 48381

Property Tax ID (include all applicable IDs):16-10-227-018

Status of submitter relative to the property (check all that apply):

	Former	Current	Prospective
Owner	☒	☐	☐
Operator	☒	☐	☐

County: Oakland
City/Village/Township: Milford
Town: T 2N Range: R 7 E Section: 10
Quarter: NE Quarter-Quarter: NE

Decimal Degrees Latitude: 42.593101
Decimal Degrees Longitude: -83.602459

Reference point for latitude and longitude:
Center of site ☒ Main/front door ☐
Front gate/main entrance ☐ Other ☐

Collection method:
Survey ☐ GPS ☒ Interpolation ☐

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 State: Michigan Zip: 48150
Telephone: 480-722-4139 E-Mail: scott.detwiler@zf.com
Relationship of contact person to the submitter: Same
Owner Name, if different from submitter: Village of Milford Company:
Address: 1100 Atlantic Street
City: Milford State: Michigan Zip: 48381
Telephone: 248-684-1515 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)	☐	☐	☐
Soil contamination above any residential criteria	☒	☐	☐
Soil contamination above any non-residential criteria	☒	☐	☐
Soil aesthetic impacts	☐	☐	☐
Groundwater contamination above any residential criteria	☒	☐	☐
Groundwater contamination above any non-residential criteria	☒	☐	☐
Groundwater aesthetic impacts	☐	☐	☐
Soil Gas contamination above residential vapor intrusion (VI) screening levels	☐	☐	☐
Soil Gas contamination above non-residential VI screening levels	☐	☐	☐
Conditions immediately dangerous to life or health (IDLH)	☐	☐	☐
Fire & Explosion hazards related to releases	☐	☐	☐
Contamination existing in drinking water supply	☐	☐	☐
Imminent threat to drinking water supply	☐	☐	☐
Impact to Surface Water	☐	☐	☐
Surface Water Sediments above screening levels	☐	☐	☐

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?**	☒	☐	☐
Has the Notice of Migration been submitted?	☒	☐	☐

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.

For information or assistance on this publication, please contact the (program), through EGLE Environmental Assistance Center at 800-662-9278. This publication is available in alternative formats upon request.
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