

ZF Active Safety US Inc.  
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**VIA EMAIL:** [AlgerB@michigan.gov](mailto:AlgerB@michigan.gov)  
**AND CERTIFIED MAIL**

Department: Environmental, Health and Safety  
From: Scott Detwiler  
Phone: +1 480-722-4139  
Email: [Scott.Detwiler@zf.com](mailto:Scott.Detwiler@zf.com)  
Date: February 14, 2023

Brandon Alger, Project Manager  
Warren District Office, Remediation and Redevelopment Division  
Michigan Department of Environment, Great Lakes, and Energy (“EGLE”)  
27700 Donald Court  
Warren, Michigan 48092

**RE: Request to Discontinue Sampling of Observation Well OW-16D2; EGLE Docket No. AO-RRD-22-001; Facility Id. No. 63000952.**

Dear Mr. Alger,

Pursuant to Section XIII of the Administrative Order for Response Activity, EGLE Docket No. AO-RRD-22-001 (“AO”) ZF Active Safety US Inc. (“ZF”) requests modification of Section V, Part 5.3 of the AO which currently includes a requirement to sample Observation Well OW-16D2 monthly, until the AO is terminated. ZF requests a modification of the AO to replace the requirement in Part 5.3 with the sampling of Observation Wells OW-16D2R1 and OW-16D2R2, and consent to discontinue sampling of Observation Well OW-16D2 upon approval of the AO modification.

This request is supported by the updated Technical Summary Report submitted to EGLE on January 20, 2023 (“Technical Summary Report”), which described in detail the substantial investigations that ZF and its consultant, Arcadis, have completed since March 2022 to further investigate the condition of Observation Well OW-16D2 and the aquifer characteristics near the Village of Milford (“VOM”) drinking water production wells. The result of those investigations and the additional data gathered by ZF establish that samples collected from Observation Well OW-16D2 are not representative of the aquifer. Therefore, further sampling of Observation Well OW-16D2 should be immediately discontinued, and the well should be properly abandoned. The Technical Summary Report and additional data collected since its submittal establish the following:

- (i) Investigations determined that Observation Well OW-16D2 was in a compromised condition at the time of the water sampling that was relied upon to form the basis of the AO; therefore, the vinyl chloride detection data from Observation Well OW-16D2 were inaccurate and do not support the findings of fact and determinations in the AO.
- (ii) The additional work completed by ZF/Arcadis since March 2022 to install good quality replacement observation wells (OW-16D2R1 and OW-16D2R2) and the subsequent sampling of the replacement monitoring wells has demonstrated that detectable levels of vinyl chloride are not present in the groundwater in that location. In addition, these wells sustain low-flow sampling with minimal (0.26 foot [average]) to no drawdown observed during sampling (See Attached Table 1).
- (iii) ZF/Arcadis has gathered additional information to better understand the presence and lateral and vertical distribution of chlorinated volatile organic compounds (“VOCs”) in groundwater near Observation Well OW-16D2. Vertical aquifer profiling (“VAP”) was

completed at three points near Observation Well OW-16D2. Vinyl chloride was not detected at or above the reporting limit of 1.0 µg/L in any of the 36 groundwater samples collected from the three VAP borings.

- (iv) Continued monitoring of Observation Well OW-16D2 demonstrates that it is still in a compromised condition. The well is unable to sustain low-flow sampling based on the significant drawdown (5.2 to 14.7 feet) observed during low-flow sampling of the well (See Attached Table 1). This significant drawdown was also observed by Mr. Brandon Alger during the sample collection on January 26, 2023. The inability of Observation Well OW-16D2 to sustain EGLE's low-flow sampling stabilization requirements for water level indicates that groundwater samples collected from Observation Well OW-16D2 are not representative of groundwater conditions and not suitable for comparison to the Part 201 Cleanup Criteria for compliance purposes.
- (v) The down-well camera survey of Observation Well OW-16D2 conducted on July 21, 2022 following the initial redevelopment effort showed significant buildup of sediments on the well screen and evidence of corrosion, providing visual confirmation that Observation Well OW-16D2 had become compromised. As previously indicated, Observation Well OW-16D2 was constructed with galvanized steel (casing and screen) and galvanized monitoring wells are not preferred because of their low resistance to chemical attack and corrosion (as observed in Observation Well OW-16D2), especially over the course of long-term monitoring programs. None of the other wells in ZF's monitoring network are constructed with galvanized steel materials.

As outlined above and in the Technical Summary Report, Observation Well OW-16D2 remains in a compromised condition, should not be sampled, and the data associated with this well should not be used for comparison to the Part 201 Cleanup Criteria for compliance purposes. Observation Well OW-16D2 should be promptly abandoned. This well has been replaced in consultation with EGLE by Observation Wells OW-16D2R1 and OW-16D2R2, which have consistently shown behavior indicative of properly constructed and functioning monitoring wells (i.e., minimal to no drawdown during low-flow sampling). The new wells will continue to be monitored in accordance with the Monitoring Plan and the Contingency Plan included in the Technical Summary Report. Therefore, ZF is requesting that the requirement to sample Observation Well OW-16D2 included in the AO be replaced with the sampling of Observation Wells OW-16D2R1 and OW-16D2R2 until the AO has been withdrawn and replaced or terminated. ZF appreciates EGLE's attention to this matter. Please include this letter and its attachments in the administrative record for the AO and the former Kelsey-Hayes Site.

If you have any questions, please contact me at the phone number listed in the header on the first page of this letter; Mr. Robert Bleazard – ZF Senior EHS Manager, Environmental Remediation at 480-722-4866; or Mr. John McInnis of Arcadis at 248-994-2285.

Sincerely,



Scott Detwiler  
Senior Regional EHS Manager  
ZF Environmental, Health and Safety

Enclosures

Table 1: Observation Wells OW-16D2, OW-16D2R1, and OW-16D2R2 Groundwater Analytical Results and Field Parameters

cc by email only:

Mr. Robert Bleazard, ZF  
Ms. Kelly Martorano, ZF  
Mr. John McInnis, Arcadis  
Mr. Troy Sclafani, Arcadis  
Mr. Grant Gilezan, Dykema  
Mr. Paul Stewart, Dykema