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ZF Active Safety US Inc.

PROGRESS REPORT NO. 11

Former Kelsey-Hayes Company Site
Milford, Michigan

Administrative Order for Response Activity
EGLE Docket No. AO-RRD-22-001

March 15, 2023

**PROGRESS REPORT NO. 11
FORMER KELSEY-HAYES COMPANY
MILFORD, MICHIGAN
ADMINISTRATIVE ORDER FOR RESPONSE ACTIVITY
EGLE DOCKET NO. AO-RRD-22-001**

This progress report has been prepared and is being submitted pursuant to Section XII of the Administrative Order for Response Activity, Docket No. AO-RRD-22-001 (AO) issued by the Michigan Department of Environment, Great Lakes, and Energy (EGLE) to ZF Active Safety US Inc. (ZF or Respondent) on March 16, 2022 (effective date), with respect to the former Kelsey-Hayes Company site in Milford, Michigan. This progress report provides information regarding response activities and other matters related to the AO that occurred from February 15, 2023, through March 14, 2023.

Chronological Description of Activities Conducted During the Specified Reporting Period:

- No activities were conducted during the reporting period.

Results of Sampling and Tests and Other Data

- The laboratory analytical report for samples collected on February 7, 2023, from compromised observation well OW-16D2 and observation wells OW-16D2R1 and OW-16D2R2 was submitted to EGLE and the Village of Milford (VOM) on February 21, 2023, and is included in **Attachment 1**. Vinyl chloride was not detected at or above the reporting limit of 1.0 microgram per liter (µg/L) in any of the February 7, 2023 samples.
- The summary of laboratory analytical results of samples and field parameters collected from compromised observation well OW-16D2 and observation wells OW-16D2R1 and OW-16D2R2 was updated to include the laboratory analytical results from the February 7, 2023, sampling event and is included in **Attachment 2**.

Status of Access Issues

- There were no issues with access during the reporting period.

Scheduled for the Next Reporting Period

- Conduct sampling at compromised observation well OW-16D2 and observation wells OW-16D2R1 and OW-16D2R2 on March 21, 2023, with analysis of volatile organic compounds (VOCs) using United States Environmental Protection Agency (USEPA) Test Method 8260D by Eurofins Canton, Ohio (Eurofins) within 10 to 14 days of sample collection.

- If by April 5, 2023, ZF does not receive EGLE's approval to discontinue sampling at compromised observation well OW-16D2, then ZF will arrange to sample this well during April 2023, with analysis of VOCs using USEPA Test Method 8260D conducted by Eurofins within 10 to 14 days of sample collection.¹
- Conduct monthly sampling at observation wells OW-16D2R1 and OW-16D2R2, with analysis of VOCs using USEPA Test Method 8260D by Eurofins within 10 to 14 days.
- Continue to work with Ms. Yusko-Kotimko on ZF's Permit Application for Water Supply Systems pursuant to Act 399 for construction of the VOM treatment system improvements.

Other Relevant Information

- No other relevant information was identified during this reporting period.

Attachments

1. Laboratory Analytical Report (Observation Wells OW-16D2, OW-16D2R1, and OW-16D2R2)
2. Summary of Analytical Results of Samples and Field Parameters (Observation Wells OW-16D2, OW-16D2R1, and OW-16D2R2)

¹ Pursuant to Section XIII of the AO, ZF provided EGLE a formal written request on February 14, 2023, to discontinue sampling the compromised observation well OW-16D2 that does not meet EGLE's requirements for continued groundwater monitoring, along with the corresponding technical justification supporting the request. ZF is currently awaiting EGLE's approval of the request to discontinue sampling observation well OW-16D2 and continue sampling the properly functioning replacement observation wells OW-16D2R1 and OW-16D2R2 that were installed in consultation with EGLE according to approved well construction criteria.

ATTACHMENT 1

**Laboratory Analytical Report (Observation Wells OW-16D2, OW-16D2R1,
and OW-16D2R2)**



ANALYTICAL REPORT

PREPARED FOR

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JOB DESCRIPTION

TRW Milford

JOB NUMBER

240-180068-1

Eurofins Canton

Job Notes

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to the NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory. This report is confidential and is intended for the sole use of Eurofins Environment Testing North Central, LLC and its client. All questions regarding this report should be directed to the Eurofins Environment Testing North Central, LLC Project Manager who has signed this report.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing North Central, LLC Project Manager.

Authorization

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Definitions/Glossary

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!"#\$%&#'(()*+,-,*,+

Qualifiers

GC/MS VOA

Qualifier	Qualifier Description
I	\$2=07:31@#3J1#:2:/<31#K:@#:2:/<L1=#;!?"M3#2!3#=131731=N

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
O	A0@31=#M2=1?#3J1#P#P#7!/MQ2#3!#=1@0R2:31#3J:3#3J1#?1@M/3#0@#?1S!#?2#=#?<#K10RJ3#":@0@
TF	B1?7123#F17!81?<
.5A	!23:02@#5?11#A0UM0=
.5I	!./!2<#5!#Q02R#I203
.V5	!23:02@#V!#5?11#A0UM0=
%>F	%MS/07:31#>?!?#F:30!#W2!#Q:/0L1=#:"@!/M31#=#;1?1271X
%0/#5:7	%0/M30!2#5:73!?
%A	%131730!2#A0Q03#W%!#D%Y>X
%AZ#F6Z#F>Z#S	\$2=07:31@#:##%0/M30!2Z#F1*:2:/<@0@Z#F1*1[3?:730!2Z#!?#:#=030!2:/#\$2030:/#Q13:/@D:20!2#:2:/<@0@#!;#3J1#@:QS/1
%A.	%170@0!2#A181/#.!27123?:30!2#WF:=0!7J1Q0@3?<X
>%A	>@30Q:31=#%131730!2#A0Q03#W%0!02X
AY%	A0Q03#!;#%131730!2#W%!#D%Y>X
AY\	A0Q03#!;#M:2303:30!2#W%!#D%Y>X
H.A	>B6#?17!QQ12=1=#PH:[0QMQ#.!23:Q02:23#A181/P
H%6	H020QMQ#%13173:"/1#6730803<#WF:=0!7J1Q0@3?<X
H%.	H020QMQ#%13173:"/1#.!27123?:30!2#WF:=0!7J1Q0@3?<X
H%A	H13J!=#%131730!2#A0Q03
HA	H020QMQ#A181/#W%0!02X
HBV	H!@3#B?!"./!1#VMQ"1?
HVA	H13J!=#M:2303:30!2#A0Q03
V.	V!3#./7M/:31=
V%	V!3#%131731=#:3#3J1#?1S!#?302R#/0Q03#W!#H%A#!?#>%A#0;#@J!K2X
V>]	V1R:3081#D#6"@123
BY9	B!@03081#D#B?1@123
BVA	B?:7307:/#M:2303:30!2#A0Q03
BF>9	B?1@MQS3081
\.	\M:/03<#.!23?!
F>F	F1/:3081#>?!?#F:30!#WF:=0!7J1Q0@3?<X
FA	F1S!#?302R#A0Q03#!?#F1UM1@31=#A0Q03#WF:=0!7J1Q0@3?<X
FB%	F1/:3081#B1?7123#%0;1?1271Z#:#Q1:@M?1#!;#3J1#?1/:3081#=#;1?1271#"13K112#3K!#S!023@
E>5	E![0703<#>UM08:/123#5:73!#W%0!02X
E>\	E![0703<#>UM08:/123#M!30123#W%0!02X
EVE.	E!#VMQ1?!M@#E!#.IM23

>M?!,02@#.:23!2

