



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

July 10, 2023

VIA EMAIL AND CERTIFIED MAIL – 7021 2720 0000 5783 4231
RETURN RECEIPT REQUESTED

Scott Detwiler
Senior Regional Environmental Health and Safety Manager
ZF Active Safety US Inc.
11202 East Germann Rd.
Mesa, Arizona 85212

Dear Scott Detwiler:

SUBJECT: Acknowledgement of Compliance with Paragraph 5.3 of the Administrative Order for Response Activity, as Modified, for the Former Kelsey-Hayes Company; 101 Oak Street, Milford, Oakland County, Michigan; Site ID No. 63000952; EGLE Docket No. AO-RRD-22-001

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) has determined ZF Active Safety US Inc. (ZF), formerly Kelsey-Hayes Company, to be in compliance with Paragraph 5.3 of the Administrative Order for Response Activity AO-RRD-22-001(AO), as modified, as of the date of this letter.

On May 30, 2023, prior to making any attempts to remove monitoring well OW-16D2 from the ground, ZF's consultant (Arcadis) completed a down-well camera log of OW-16D2. The camera log confirmed that OW-16D2 was fouled, showing signs of degradation at the joints and poor communication with the aquifer in the screened portion.

On May 31, 2023, EGLE was made aware that after numerous attempts made by ZF to remove OW-16D2 from the ground in accordance with Paragraph 5.3 of the AO, as modified, OW-16D2 was unable to be successfully removed. For the removal, ZF hired subcontractor, Cascade Environmental (Cascade). Cascade followed the Work Plan submitted on May 8, 2023, to EGLE by Arcadis on behalf of ZF. The Work Plan was informally approved by EGLE. During the removal process there was a physical failure of the well casing below the surface of the ground. Cascade used extra steel piping to reconnect the casing. However, upon further attempts to remove OW-16D2 the casing disconnected and Cascade, Arcadis, and ZF determined that removal of OW-16D2 from the ground was not feasible. Since it was not feasible to fully remove OW-16D2 from the ground, Cascade abandoned OW-16D2 in place following the Work Plan and the American Society for Testing and Materials Standard D5299/D5299M-18 as required for under the AO, as modified.

Scott Detwiler

Page 2

July 10, 2023

EGLE concurs with ZF that the unique construction and subsequent physical degradation of OW-16D2 prevented ZF from successful recovery of OW-16D2. EGLE acknowledges, and is satisfied with, ZF's good faith effort to remove OW-16D2 and has determined ZF to be in compliance with Paragraph 5.3 of the AO.

If you have any questions, please contact Lyndsey Bleech, Compliance and Enforcement Section, Case Coordinator, 517-285-4527; BleechL@Michigan.gov; or EGLE P.O. Box 30473, Lansing, MI 48909-7973; or you may contact me.

Sincerely,

A handwritten signature in black ink that reads "Mike Neller". The signature is written in a cursive style with a horizontal line at the end.

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

cc: Christian Wuerth, Village of Milford
Danielle Allison-Yokom, DAG
Joshua Mosher, EGLE
Dan Yordanich, EGLE
Mary Miller, EGLE
Darren Bowling, EGLE
Paul Owens, EGLE
Cheryl Wilson, EGLE
Emily Bertolini, EGLE
Katie Noetzel, EGLE
Brandon Alger, EGLE
Lyndsey Bleech, EGLE