



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 16, 2022

VIA E-MAIL AND CERTIFIED MAIL – 7020 3160 0000 5835 1661
RETURN RECEIPT REQUESTED

Mr. Scott Detwiler
Regional Environmental Health and Safety Manager
ZF Active Safety US Inc.
12025 Tech Center Drive
Livonia, Michigan 48150-2122

Dear Mr. Detwiler:

SUBJECT: Administrative Order for Response Activity, Former Kelsey-Hayes Company;
101 Oak Street, Milford, Oakland County, Michigan; Facility ID No. 63000952

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) is issuing the enclosed Administrative Order for Response Activity (AO) to ZF Active Safety US Inc. (ZF), pursuant to Section 20119 of Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, for the Former Kelsey-Hayes Company, located at 101 Oak Street, Milford, Oakland County, Michigan (Property).

ZF is a person who is liable under Section 20126 of Part 201 for the release of hazardous substances at the Property. EGLE has determined that there is an imminent and substantial endangerment to public health, safety, welfare, or the environment because of these releases, and ZF must take immediate action to abate the danger or threat.

ZF and its predecessors owned and operated a manufacturing plant at the Property until 2001. Various reports compiled between February 1995 and November 1996 and reviewed by EGLE indicated the presence of hazardous substances migrating off the Property. In 1997 EGLE notified Kelsey-Hayes Company (now ZF) that the Property was a Facility as defined under Part 201 and that Kelsey-Hayes Company was an owner or operator responsible for an activity causing a release of a hazardous substance and, therefore, liable under Section 20126 of Part 201 for performance of response activities, including but not limited to determining the nature and extent of the release at the Property.

In June 2021 EGLE received groundwater sampling data that identified exceedances of vinyl chloride above Part 201 generic groundwater cleanup criteria for drinking water in ZF's monitoring well network less than 200 feet from the village of Milford's municipal drinking water wells. The presence of vinyl chloride in the monitoring well, identified as OW-16D2, indicates that ZF's contamination plume is beyond the capture of ZF's pump and treat system. The presence of vinyl chloride, a known carcinogen, represents an imminent and substantial endangerment to public health, safety, welfare, or the environment within the meaning of Section 20119 of Part 201.

Mr. Scott Detwiler

Page 2

March 16, 2022

EGLE expects ZF to immediately perform the response activities as required by the AO. Be advised that if ZF violates or fails to immediately and satisfactorily comply with this AO, ZF may be subject to civil fines of up to \$25,000 for each day of violation and may be liable for exemplary damages up to three times the amount of any costs incurred by the State of Michigan as a result of ZF's violation or failure to comply with this AO.

EGLE will undertake response activities at any time it is determined necessary to protect public health and reserves the right to perform any and all portions of the response activities required by the AO that ZF has failed or refused to perform properly or promptly. EGLE will seek cost recovery for any response activity costs incurred to address the imminent and substantial endangerment to public health, safety, and welfare and will seek civil fines pursuant to Part 201.

If you have any questions regarding this matter, please contact Mr. Mike Neller, Director, RRD, at 517-512-5859; NellerM@Michigan.gov; or EGLE, P.O. Box 30426, Lansing, Michigan 48909-7926.

Sincerely,



Liesl Eichler Clark

Director

517-284-6700

Enclosure

cc/enc: 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, Chief Deputy Director, EGLE
Mr. Mike Neller, EGLE
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
Mr. Kevin Wojciechowski, EGLE