



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

October 25, 2021

CERTIFIED MAIL 7020 2450 0000 0100 7280  
RETURN RECEIPT REQUESTED

ZF Active Safety US Inc.  
Attention: Scott Detwiler  
12025 Tech Center Drive  
Livonia, Michigan 48150-2122

Dear Scott Detwiler:

**SUBJECT:** Compliance Communication Regarding the Release at Kelsey Hayes - Milford, 101 Oak Street, Milford, Oakland County, Michigan  
EGLE Facility ID No. 63000952

As previously communicated to you in a letter dated, September 1, 2021, The Michigan Department of Environment, Great Lakes, and Energy (EGLE) has information indicating environmental contamination is present on the property located at 101 Oak Street, Milford, MI 48381 (Property). Subject to Michigan's environmental cleanup law, Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (Part 201) EGLE considers ZF Active Safety US Inc. (formerly Kelsey-Hayes Company) responsible for the contamination.

In June 2021, EGLE received groundwater sampling data that had exceedances of vinyl chloride above the Part 201 generic drinking water criteria in monitoring well (OW-16D2) that is located less than 200 feet from the Village of Milford drinking water wells. Vinyl chloride is a hazardous substance under Part 201. An area where hazardous substances exceed the criteria for unrestricted residential use is known as a Facility as defined in Part 201, which triggers obligations under the law. The concentration of vinyl chloride found at the Property makes it a Facility regulated by Part 201 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.

As a person liable under Section 20126 of Part 201, ZF Active Safety US Inc. has responsibility to comply with Section 20114 of Part 201, which lists the requirements of a liable party to address environmental contamination. These steps include, as applicable:

- Immediately taking measures to contain or remove the contamination source;
- Notifying EGLE and affected neighbors if contamination has migrated off the Property;
- Delineating the extent of the contamination; and
- Undertaking interim response activities to mitigate an imminent threat and ultimately, undertake response activities to achieve the cleanup criteria under this part.

Additional requirements under Section 20114 of Part 201 may apply to this situation.

ZF Active Safety US Inc.

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In addition to the request by EGLE in the September 1, 2021 letter, EGLE is requesting ZF Active Safety US Inc. to initiate the interim response measure *of installing treatment on the Village of Milford drinking water system*) to protect the public from the imminent and substantial endangerment caused by the chlorinated solvent plume emanating from former Kelsey Hayes Property. Please provide a letter of commitment to conduct the interim response actions and a schedule for implementation within 14 days of receipt of this letter to the following address:

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  
586-623-2948  
WojciechowskiK@Michigan.gov

The explanations of Part 201 in this letter should not be considered a complete listing of ZF Active Safety US Inc.'s legal obligations. The Part 201 statute and rules can be found in its entirety at the EGLE Web site: [www.Michigan.gov/deq](http://www.Michigan.gov/deq), by clicking on 'Land', 'Land Remediation & Redevelopment', then 'Site Investigation and Remediation'.

Questions regarding this letter, contact Kevin Wojciechowski, Project Manager, at 586-623-2948 or email at [WojciechowskiK@Michigan.gov](mailto:WojciechowskiK@Michigan.gov); or you may contact me at the telephone number listed below. EGLE looks forward to your cooperation in addressing the contamination at the Kelsey Hayes – Milford Facility.

Sincerely,



Paul Owens, District Supervisor  
Warren District Office  
Remediation and Redevelopment Division  
586-235-6990

cc: Christian Wuerth, Village of Milford  
Josh Mosher, EGLE  
Dan Yordanich, EGLE  
Mary Miller, EGLE  
Cheryl Wilson, EGLE  
Tiffany Yusko-Kotimko, EGLE  
Katie Noetzel, EGLE  
Kevin Wojciechowski, EGLE