



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | www.pca.state.mn.us | Equal Opportunity Employer

February 7, 2013

Mr. Charles Pinter, Senior Environmental Engineer
Ford Motor Company
Environmental Quality Office
Fairlane Plaza North
290 Town Center Drive, Suite 800
Dearborn, Michigan 48126

RE: Ford Twin Cities Plant, 966 South Mississippi River Boulevard, Saint Paul
MPCA VIC Project Number VP23530
Response to Statistical Analysis Request for North Parking Lot Area

Dear Mr. Pinter:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program has reviewed the "Statistical Analysis Request for North Parking Area" letter (Statistical Request), dated July 31, 2012, for the Ford Twin Cities Plant site, located at the address referenced above (the Site). The Statistical Request was prepared and submitted on your behalf by ARCADIS U.S., Inc. (Arcadis).

The Statistical Request presents two questions in relation to the North Parking Area, approximately 29 acres, which is shown in the figure in Attachment B:

1. What is the average number of soil borings necessary to be eligible for a No Further Action (NFA) Determination in the North Parking Area for the current land use of industrial/commercial?
2. What is the average number of soil borings necessary to be eligible for a NFA Determination in the North Parking Area for a future land use of residential?

No Action Determinations and No Further Action Determinations are issued when the extent and magnitude of contamination has been identified and a judgment is made that the contamination does not pose a risk to receptors, based upon a specific land use. The number of soil borings/samples necessary to characterize soil within the North Parking Area is independent of the type of land use. The type of land use comes into play when determining if response actions are needed prior to issuing a requested No Action/No Further Action Determination.

The number of soil borings discussed during the June 20, 2012, meeting and in the Statistical Request represents the initial investigation of the North Parking Area. This does not take into consideration delineation of hot spots or other follow-up sampling deemed necessary after a review of data collected during the initial mobilization. Feedback and direction from VIC staff on the scope of environmental investigations is provided through review, comment, and approval of work plans and reports submitted for review.

Mr. Charles Pinter, Senior Environmental Engineer

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Please note the disclaimers found in Attachment A. If you have any questions on the above, please contact Shanna Schmitt at 651-757-2697/shanna.schmitt@state.mn.us or Amy Hadiaris at 651-757-2402/amy.hadiaris@state.mn.us.

Sincerely,

A handwritten signature in cursive script that reads "Shanna Schmitt". The signature is written in black ink and is positioned above the typed name.

Shanna Schmitt, P.G.

Project Manager/Hydrogeologist

Site Remediation and Redevelopment Section

Remediation Division

SS:jmp

Attachments

cc: Angharad Pagnon, ARCADIS U.S., Inc.

Merritt Clapp-Smith, City of St. Paul

ATTACHMENT A
DISCLAIMERS
FORD TWIN CITIES PLANT
MPCA VIC PROJECT NUMBER VP23530

1. Reservation of Authorities

The MPCA Commissioner reserves the authority to take any appropriate actions with respect to any release, threatened release, or other conditions at the Site. The MPCA Commissioner also reserves the authority to take such actions if the voluntary party does not proceed in the manner described in this letter or if actions taken or omitted by the voluntary party with respect to the Site contribute to any release or threatened release, or create an imminent and substantial danger to public health and welfare.

2. No MPCA Assumption of Liability

The MPCA, its Commissioner and staff do not assume any liability for any release, threatened release or other conditions at the Site or for any actions taken or omitted by the voluntary party with regard to the release, threatened release, or other conditions at the Site, whether the actions taken or omitted are in accordance with this letter or otherwise.

3. Letter Based on Current Information

All statements, conclusions and representations in this letter are based upon information known to the MPCA Commissioner and staff at the time this letter was issued. The MPCA Commissioner and staff reserve the authority to modify or rescind any such statement, conclusion or representation and to take any appropriate action under his authority if the MPCA Commissioner or staff acquires information after issuance of this letter that provides a basis for such modification or action.

4. Disclaimer Regarding Use or Development of the Property

The MPCA, its Commissioner and staff do not warrant that the Site is suitable or appropriate for any particular use.

5. Disclaimer Regarding Investigative or Response Action at the Property

Nothing in this letter is intended to authorize any response action under Minn. Stat. § 115B.17, subd. 12.

ATTACHMENT B
MAP OF NORTH PARKING AREA
FORD TWIN CITIES PLANT
MPCA VIC PROJECT NUMBER VP23530

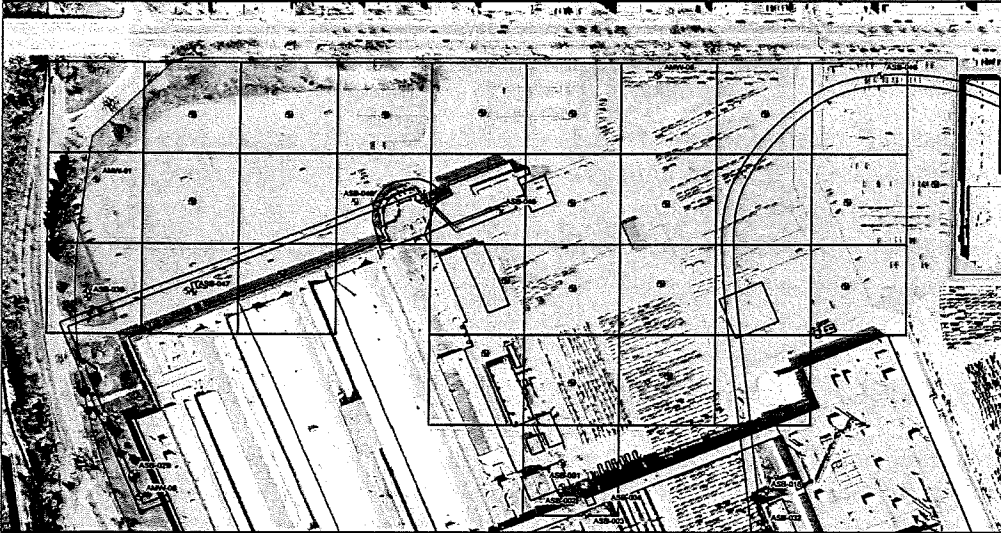


Figure from the July 31, 2012 "Statistical Analysis Request for North Parking Area" letter, prepared by Arcadis U.S., Inc.