



Minnesota Pollution Control Agency

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August 14, 2013

Mr. Charles Pinter
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, St. Paul
MPCA VIC Project Number VP23530
MPCA PBP Site ID Number PB3682
PINs 05-117-21-13-0016 & 05-117-21-13-0015
Environmental Contingency Plan Approval

Dear Mr. Pinter:

The Minnesota Pollution Control Agency (MPCA) Petroleum Brownfields (PB) and Voluntary Investigation and Cleanup (VIC) Programs staff have reviewed the "Environmental Contingency Plan – Site-wide Contingency Plan" (ECP), dated July 17, 2013, for the Ford Twin Cities Plant site located at the address referenced above (the Site). The ECP was prepared and submitted on your behalf by Arcadis U.S., Inc. (Arcadis).

The ECP describes the soil screening and testing procedures that will be followed during demolition and earth-moving activities at the Site. In general, during soil excavation, the soils will be screened at least every 10 cubic yards with more frequent screening if indications of contamination are found.

The ECP is hereby approved subject to the following clarifications/modifications:

1. The MPCA-approved "Case-Specific Beneficial Use Determination" (CSBUD), as referenced on page 3 and elsewhere in the ECP, applies only to reuse of crushed concrete. Decisions about the on-site reuse or off-site disposal of soil should be determined using field screening and analytical testing results and should take into account the desired end-use of the Site. For non-petroleum contaminants, refer to the MPCA's Soil Reference Values (SRVs) for the desired property use (e.g. residential, recreational, or commercial/industrial, as applicable). Also, for soil impacted by volatile organic compounds (VOCs) originating from a non-petroleum source, soil targeted for on-site reuse should meet the MPCA's Screening Soil Leaching Values (SLVs) or MPCA-approved Site-Adjusted SLVs.
2. If excavated or exposed soils exhibit signs of contamination, then soil samples should be collected and analyzed for the compounds listed on Page 4 of the ECP, as applicable for the suspected type of release. Note that excavated or exposed soils with photoionization detector (PID) readings above background (as opposed to 10 parts per million) should be analyzed for VOCs.

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3. Since redevelopment activities will not occur at this Site for some time, typical soil reuse scenarios (e.g. placement under pavement, etc.) are not applicable at this time. Impacted soil shall not be stockpiled for future on-site reuse for longer than the demolition phase. Excavated soils can be replaced if they meet applicable criteria. For petroleum-impacted soil, refer to PRP Guidance Document 3-01 (Excavation of Petroleum Contaminated Soil and Tank Removal Sampling). For soil impacted by hazardous substances, refer to the MPCA's Soil Leaching Values (for VOCs) and applicable Soil Reference Values (for other contaminants).

An ECP implementation report describing the screening and sampling results, soil disposal, imported soils, dewatering activities, etc. shall be prepared and submitted to the MPCA within six months following the completion of demolition activities. If the implementation report cannot be submitted within that timeframe, please notify the MPCA VIC and PB staff of the status of the project.

Approval of this plan does not suggest that any of the costs incurred will be eligible for reimbursement from the Petro Board. Please be advised that the determination made in this letter is subject to 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 Stacey Hendry-Van Patten at 651-757-2425 or stacey.vanpatten@state.mn.us.

Sincerely,

for 

Shanna Schmitt, P.G.
Project Manager
Site Remediation and Redevelopment Section
Remediation Division



Stacey Hendry-Van Patten
Project Leader
Petroleum Remediation Section
Remediation Division

SS:SVP:jmp

Attachment

cc: Angharad Pagnon, ARCADIS U.S., Inc.
John Meyers, Ford Twin Cities Assembly Plant
Merritt Clapp-Smith, City of St. Paul

ATTACHMENT A
DISCLAIMERS
FORD TWIN CITIES PLANT
MPCA PROJECT NUMBER VP23530
MPCA PBP PROJECT NUMBER PB3682

1. Reservation of Authorities

The Minnesota Pollution Control Agency (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.

