



# Minnesota Pollution Control Agency

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May 19, 2015

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

RE: Ford Twin Cities Plant, 966 South Mississippi River Boulevard, St. Paul  
MPCA VIC Project Number VP23530  
Approval of Area C Investigation Work Plan

Dear Mr. Pinter:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program has reviewed the Area C Investigation Work Plan (Work Plan) for the Ford Twin Cities Plant site located at the address referenced above (the Site). The Work Plan is specific to the former industrial waste disposal area located on the river parcel, west of Mississippi River Boulevard. The Work Plan, dated March 17, 2015, was prepared and submitted on your behalf by Arcadis U.S., Inc.

The Work Plan proposes seven borings to be drilled through the concrete pavement, fill soils, and demolition debris that overlie the industrial waste, with the goal of collecting waste characterization samples and delineating the horizontal and vertical limits of the industrial waste. Other borings will be drilled around the perimeter of Area C for the installation of additional monitoring wells. The proposed investigation activities also include the collection of surficial soil samples from Area C side slopes and excavation of test trenches in the southern side slope. Ford Motor Company plans to implement the Work Plan in June 2015, or as soon as the required local permits have been obtained.

Given the setting and nature of the investigation, it is understood that field decisions will be necessary with respect to the placement of certain soil borings, the selection of soil sample intervals, and the possible addition of one or more borings and/or monitoring wells. Staff in the VIC Program plans to be on-site for much of the field work and will participate in field decisions relating to these matters.

The Work Plan is hereby approved, subject to the following conditions/clarifications:


1. The Work Plan (page 7) states that up to five samples will be collected per boring, but the final number of samples will be determined based on field observations. As previously discussed, VIC staff expects that several soil samples will be collected from each boring advanced within the footprint of Area C, in order to obtain data that is representative of various intervals of fill soils and waste material. With respect to the former, there is value in documenting, through analytical testing, the lack of contamination in the fill soils, in order to support and confirm field observations that may lead to that conclusion.

2. The pending investigation report must evaluate the potential interaction of groundwater and surface water with the industrial waste at the base of Area C during flood events and seasonally high water levels. Evaluating these scenarios requires knowledge of the base elevation and footprint of the industrial waste; surface water elevations over time, as measured by the Army Corp of Engineers' tailwater river gauge at Lock & Dam #1; and fluctuations in the local water table associated with changing river stages, as measured by the network of monitoring wells at Area C. To this effect, please include in the pending investigation report the surface water elevation data from the 2014 and other historical flood events, and groundwater elevation data from the Area C monitoring network, including the weekly static water level measurements that were collected during and following the 2014 flood event. The 2014 surface water and groundwater elevation data should be evaluated relative to each other, to correlate observed fluctuations in the water table with the changing stage of the river. The collective body of surface water and groundwater data should be evaluated relative to the base and upper elevations of industrial waste at Area C.
3. The pending investigation report should include detailed information and data pertaining to the four barrels that were discovered and removed from the side slopes of Area C. This information was previously submitted to the MPCA, but it should also be included in the larger investigation report to better inform any conclusions contained within.

A complete and detailed site conceptual model is necessary in order to evaluate potential risk exposure scenarios with respect to human health and the environment. Data collected during this investigation will build upon the historical information that was summarized in the 2014 "Area C – Comprehensive Site History and Investigation Report." The figures, tables, and cross-sections of the pending investigation report should include the historical sampling locations and data in addition to the new information. If, after review of the pending investigation report, VIC staff determines that additional field work is needed to address data gaps or answer unresolved questions, a supplemental scope of work will be necessary.

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](mailto:shanna.schmitt@state.mn.us)) or Amy Hadiaris at 651-757-2402 ([amy.hadiaris@state.mn.us](mailto:amy.hadiaris@state.mn.us)).

Sincerely,

*for* 

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



Amy Hadiaris, P.G.  
Hydrogeologist  
Site Remediation & Redevelopment Section  
Remediation Division

AH:mcb

Attachment

cc: Ryan Oesterreich, ARCADIS  
Merritt Clapp-Smith, City of St. Paul  
Whitney Clark, Friends of the Mississippi River  
John Anfinson, National Park Service

ATTACHMENT A  
DISCLAIMERS  
FORD TWIN CITIES PLANT  
VIC PROJECT NUMBER VP23530

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. § SB.17, subd. 12.