



Minnesota Pollution Control Agency

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

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May 20, 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
MPCA PBP Site ID Number PB3682
PINs: 05-117-21-13-0015 & 05-117-21-13-0016
Approval of Site Decommissioning Response Action Plan

Dear Mr. Pinter:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) and Petroleum Brownfields (PB) Programs has reviewed the Site Decommissioning Response Action Plan (SDRAP) dated April 1, 2015, for the Ford Twin Cities Plant site located at the address referenced above (the Site). The SDRAP was prepared and submitted on your behalf by Arcadis U.S., Inc.

The Site-Wide Contingency Plan approved by the MPCA on August 14, 2013, has guided soil screening and testing during demolition activities at the Site. Through that process, numerous discrete areas of soil contamination have been identified during site decommissioning. The purpose of the SDRAP is to lay out a general framework to address localized areas of soil contamination discovered on the main plant parcel during the decommissioning phase.

As per Section 6.3 of the SDRAP, for every impacted area identified during decommissioning activities (e.g., removal of slabs, footings, foundations, utilities), a short SDRAP Addendum will be submitted for MPCA review and approval. The SDRAP Addendum will describe the type, location, and source (if known) of the contamination and propose a response action specific to that release. To streamline submittal and review, the MPCA has approved under separate cover a template for the SDRAP Addendum. A copy of the approved SDRAP Addendum template is included with this letter as Attachment B.

Localized excavations of impacted soil conducted under the SDRAP and Addendums are considered interim response actions. It is understood that a site-wide response action plan will be developed and submitted for MPCA review following completion of the comprehensive Site investigation.

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

1. For areas impacted by hydrocarbon solvents or other non-petroleum volatile organic compounds, please note that the MPCA's soil leaching values (not soil reference values) are the appropriate risk-based screening values by which to evaluate the need for or completeness of a response action.

Mr. Charles Pinter

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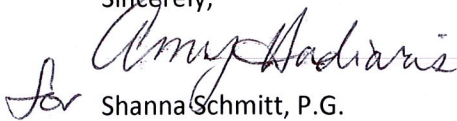
2. A minimum of four sidewall samples (one from each sidewall) should be collected from any remedial excavation.
3. Data collected during the site-wide investigation (e.g., drilling and other work plan activities) should not be included in the pending SDRAP Implementation Report, unless such data relate directly to an area that was remediated under the SDRAP. The MPCA prefers submittal of a separate comprehensive site-wide investigation report to document and evaluate the results of the drilling investigations.
4. The artificial boundaries of the "Focus Areas" were helpful when buildings and other structures were still present at the Site. However, now that site decommissioning is near completion, the MPCA staff prefers to leave behind the "Focus Area" terminology and instead have data presented on site-wide maps, supplemented by appropriately scaled figures (e.g., feature, group of features, or building-specific).

Please prepare and submit a SDRAP Implementation Report to the MPCA within six months following the completion of demolition activities. At a minimum, the SDRAP Implementation Report should include a description of the following, with supporting documentation, tables, and figures, as appropriate:

- Environmental oversight activities, including a comprehensive summary of field screening observations, measurements, and soil data generated during site decommissioning activities;
- General soil management strategy used during removal of footings, foundations, and other sub-grade features (e.g., stockpile management procedures, on-site reuse and placement criteria for excavated soil and crushed concrete, locations/depths where such materials were reused on-site, and total volumes of soil and crushed concrete that were reused on-site versus disposed off-site in a permitted landfill);
- Interim soil response actions that occurred under the SDRAP. Also include the previously-completed interim response action that was conducted during excavation of the temporary storm water pond;
- Dewatering activities;
- Imported soil (if any); and
- Grading activities completed up to that date.

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), Amy Hadiaris at 651-757-2402 (amy.hadiaris@state.mn.us) or Stacey Hendry-Van Patten at 651-757-2425 (staceyvanpatten@state.mn.us).

Sincerely,



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



Stacey Hendry-VanPatten
State Program Administrator
Petroleum Remediation & Redevelopment Section
Remediation Division

Attachment

cc: Ryan Oesterreich, ARCADIS
Merritt Clapp-Smith, City of St. Paul

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.

ATTACHMENT B
TEMPLATE FOR SDRAP ADDENDUM
FORD TWIN CITIES PLANT
VIC PROJECT NUMBER VP23530

Site Decommissioning Remedial Action Plan Addendum

Addendum Number: _____

Submittal Date: _____

1) Source and Location of Unexpected Environmental Condition (UEC)

Location of release:

XY Coordinates of release:

Attach figures with location

2) Description of UEC:

Summary of observations (e.g., elevated PID readings, visual staining, olfactory indications).

Attach photo log and field notes for additional information.

3) Analytical sampling:

Media sampled: Soil

Number and location of samples that were collected:

Parameters analyzed:

Attach table with analytical data if currently available; or indicate data pending

4) Proposed remedial action:

Attachments:

1. *Figure 1 – General Location of UEC*
2. *Figure 2 – UEC-specific Sample Location*
3. *Photo Log*
4. *Field Notes*
5. *Summary table of analytical data, with comparisons to appropriate risk based values*