



Minnesota Pollution Control Agency

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March 4, 2016

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 & 05-117-21-13-0015
Approval of SDRAP Addendums

Dear Mr. Pinter:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program and the Petroleum Brownfields Program (PBP) has completed review of the 60 Site Decommissioning Response Action Plan (SDRAP) Addendums for the Ford Twin Cities Plant site, located at the address referenced above (the Site). The SDRAP Addendums were prepared and submitted on behalf of Ford Motor Company (Ford) by Arcadis U.S., Inc. (Arcadis) between April 16 and October 26, 2015. MPCA staff previously approved numerous SDRAP Addendums via email correspondence, and implementation of those soil response actions has already begun. Nevertheless, for administrative ease, this letter provides formal documentation of MPCA's approval for the entire set of SDRAP Addendums, subject to any conditions noted below.

By way of background, a Site Wide Contingency Plan approved by the MPCA on August 14, 2013 describes the soil screening and testing procedures to be implemented during demolition activities at the Site, as soil in previously inaccessible areas became exposed during removal of building slabs, foundations, buried utilities, and other subgrade features. Full-time environmental oversight by Arcadis during demolition activities identified 60 areas where elevated organic vapors, staining, and/or odor suggested the presence of soil contamination. Soil samples for laboratory analysis were collected from each suspect area and analyzed for some combination of the following contaminants, depending on the field screening results at each specific area: diesel range organics (DRO), gasoline range organics (GRO), volatile organic compounds (VOCs), semi-VOCs, metals, polychlorinated biphenyls (PCBs), and cyanide.

A Site Decommissioning Response Action Plan approved by the MPCA on May 20, 2015, provides a general framework for addressing localized areas of soil contamination discovered on the main plant parcel during demolition activities. An SDRAP Addendum was prepared for each of the 60 impacted areas which describes the location, type, and source (if known) of contamination discovered during demolition. The SDRAP Addendums propose excavation and landfill disposal of soil that has either field signs of contamination (e.g. elevated organic vapors > 10 parts per million or odor/staining) or contaminant concentrations greater than the MPCA's risk-based screening values for residential use.

Mr. Charles Pinter

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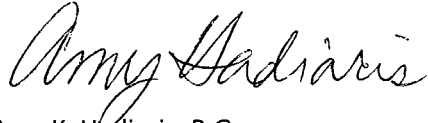
March 4, 2016

Implementation of the SDRAP Addendums comprises only the first phase of soil cleanup on the main parcel of the Site. Still pending is an Interim Response Action Plan (RAP) to address areas of soil contamination discovered during drilling and trenching activities, and a Site-Wide RAP which will propose any additional soil cleanup necessary to support the final chosen land use.

The SDRAP Addendums are approved, subject to the conditions listed on Attachment B.

Please note that this letter is subject to the disclaimers in Attachment A. Feel free to contact MPCA staff if you have any questions about this letter.

Sincerely,



Amy K. Hadjaris, P.G.
Voluntary Investigation and Cleanup Program
Remediation Division



Stacey Van Patten
Petroleum Brownfields Program
Remediation Division

cc: Ryan Oesterreich, Arcadis (ec)
Merritt Clapp-Smith, City of St. Paul PED (ec)

ATTACHMENT A
DISCLAIMERS
Twin Cities Assembly Plant
MPCA VIC Project Number VP23530
MPCA PBP Site ID Number PB3682

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.

6. This approval does not supplant any applicable state or local stormwater permits, ordinances, or other regulatory documents.

The following 13 SDRAP Addendums are approved with modifications:

SDRAP Addendum #	Location/Feature	Modification
11	MAB – railroad spur	Include SVOCs in confirmation sampling
14	MAB – roll test pit	Include SVOCs in confirmation sampling
15	MAB – worker pit #4	Collect confirmation samples as needed based on stockpile characterization results
16	MAB – inner foundation footing	Include SVOCs in confirmation sampling
20	MAB – inner foundation footing	Analyze confirmation samples for DRO/GRO
25	MAB – unidentified pit	Include VOCs in confirmation sampling
26	MAB – sewer line (paint area)	Hg-impacted soil needs special disposal, may need to go out-of-state.
27	MAB – sewer line (nickel-plating)	Include nickel in confirmation sampling
30	MAB – sewer line	Analyze confirmation samples for VOCs
44	MAB – fire loop	Analyze confirmation samples for DRO, GRO, VOCs
45	MAB – sludge pit	Include VOCs and metals in confirmation sampling
52	MAB – steam tunnel at RR spur	Include GRO, VOCs, SVOCs in confirmation sampling
56	MAB – grid screening/fire line	Include VOCs in confirmation sampling

The following 19 SDRAP Addendums propose addressing the identified area of contamination as part of a pending larger-scale response action, due to the area being laterally extensive or in close proximity to other releases, and thereby benefiting from an area-wide approach. MPCA staff will review proposed response actions for these areas when a larger-scale RAP is submitted for the Site.

SDRAP Addendum #	Location/Feature
9	Paint Building – footings at south end
13	Main Assembly Building – oil tunnel
17	Main Assembly Building – inner foundation footing
18	Main Assembly Building – inner foundation footing
28	Main Assembly Building – abandoned LCL dock
33	Main Assembly Building – outer foundation wall
34	Main Assembly Building – outer foundation wall
35	Main Assembly Building – inner foundation wall
36	Main Assembly Building – lift station containment pit
38	Main Assembly Building – outer foundation wall
40	Main Assembly Building – inner foundation wall
41	Main Assembly Building – inner foundation wall
42	Main Assembly Building – tank farm/battery house
46	Main Assembly Building – railroad bumper
47	Main Assembly Building – fire loop
48	Main Assembly Building – concrete pit
49	Training Center – foundation walls & footings
55	Main Assembly Building – sand elevator shaft
57	Main Assembly Building – sub-slab grid screening

ATTACHMENT B
MPCA REVIEW OF SDRAP ADDENDUMS
Twin Cities Assembly Plant
MPCA VIC Project Number VP23530
MPCA PBP Site ID Number PB3682

The following 28 SDRAP Addendums are approved as submitted:

SDRAP Addendum #	Location/Feature
1	Main Assembly Building (MAB) –Worker Pit #1
2	MAB – railroad spur
3	MAB –railroad spur
4	MAB –railroad spur
5	Paint Building – hydraulic lift
6	MAB – elevator pit at south wall of glass basement
7	MAB – railroad spur at south wall of glass basement
8	Packer Building – oil/water separator
10	MAB – railroad spur
12	MAB – railroad spur
19	MAB – inner foundation footing
21	MAB – inner foundation wall
22	MAB – inner foundation footing
23	MAB – cable vault
24	MAB – tritone sludge pit
29	MAB – sewer line
31	MAB – hydraulic lift
32	MAB – storm sewer
37	MAB – outer foundation wall
39	MAB – storm sewer
43	MAB – fire loop
50	MAB – foundation wall of pump room
51	MAB – foundation wall of pump room
53	MAB – steam tunnel at hopper house
54	MAB – hopper house
58	MAB – deionized water pit
59	MAB – plaster pit
60	MAB – pillar pivoting buck pits