



Minnesota Pollution Control Agency

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September 20, 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 Project Numbers VP23530 and PB3682
MPCA Billing ID: AI 685
PINs: 05-117-21-13-0015 & 05-117-21-13-0015
Approval of Site Decommissioning Remedial Action Implementation Report

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 Site Decommissioning Remedial Action Implementation Report (Report) for the Ford Twin Cities Plant, located at the address referenced above (the Site). The Report, dated March 31, 2016, was prepared and submitted on behalf of Ford Motor Company (Ford) by Arcadis U.S., Inc. The Report describes the field screening, soil sampling, and stockpile management procedures that were implemented during removal of building slabs, foundations, buried utilities, and other subgrade structures. Soil sample results are summarized in Table 5 (for excavated soil that was reused on site) and Table 6 (for soil that was sent off-site for landfill disposal).

For those areas where soil impacts were observed, this Report provides documentation of soil remediation only for those areas in which soil cleanup goals were achieved during soil excavation associated with removal of subsurface features. For those areas where soil impacts remained after removal of subsurface features, a series of Site Decommissioning Response Action Plan (SDRAP) Addendums were prepared and submitted for MPCA approval. Soil cleanup activities associated with the SDRAP Addendums will be documented in a pending implementation report.

The Report is approved, subject to the following clarifying comments:

1. As described in Section 4.1.3.1 (top of page 15) and shown in Table 5 (*Summary of Analytical Results for Soil Retained on Site for Reuse*, page 4), post-construction soil samples collected from the Northeast Temporary Sediment Retention Pond indicate that contaminated soil remains in place in the sidewalls of the pond. This soil will be removed during future implementation of a response action plan (RAP) for Fill Areas A and B. It is the understanding of MPCA staff that Ford intends to rely on an alternative means of managing stormwater runoff during implementation of the RAP for Fill Areas A and B. This will allow the northeast retention pond to be deconstructed, as needed, in order to remove contaminated soil around the pond.

2. Two soil samples described in Table 6 (*Summary of Analytical Results for Soil Sent off Site for Disposal*) had high concentrations of chlorinated solvents, as described below. The following text provides a few more details about the soil associated with those samples, based on information obtained from Arcadis staff and as documented in field notes.
 - a. Soil sample **MAB_WP1_BASE_12** (page 47 of Table 6) contained tetrachloroethene (PCE) at a concentration of 200 parts per million (ppm). This was a soil confirmation sample collected from the base of an excavation associated with removal of Worker Pit #1, located near the west wall of the main assembly building. Additional soil excavation to remove this residual contamination was proposed in SDRAP Addendum #1. Results will be reported in the pending SDRAP Addendum Implementation Report.
 - b. Soil sample **SP092-01** (page 62 of Table 6) contained trichloroethene (TCE) at a concentration of 3100 ppm. A misaligned table header ("Base Sample") mistakenly implies that SP092-01 was collected from the base of an excavation. Arcadis' field notes confirm that this soil sample was collected from a stockpile generated during excavation of sanitary and storm sewer lines near the west wall of the main assembly building. During excavation of the utility lines, field screening of soil detected a strong solvent odor and elevated PID readings (>2,000 ppm). Impacted soil excavated during removal of the utility lines was put in Stockpile 92. The stockpile was sampled for waste characterization purposes (SP092-01) and disposed of off-site. Field screening of soil at the base of the utility trench excavation detected an elevated PID reading at two locations (maximum PID was 11.4 ppm). Soil sample **MAB_E35_Trench-Base** (page 62 of Table 6) was collected from the base of the utility trench excavation. A low concentration of TCE (0.14 ppm) was detected in MAB_E35_Trench-Base. Because of the still-elevated PID reading at the base of the excavation, additional response actions were proposed in SDRAP Addendum #30. (The field screening and sampling referenced above is described in the field notes of SDRAP Addendum #30). While SDRAP Addendum #30 did not propose collection of additional soil confirmation samples, MPCA conditional approval of SDRAP Addendum #30, dated March 4, 2016, required collection of confirmation samples for VOC analysis. Results will be reported in the pending SDRAP Addendum Implementation Report.
3. Waste characterization results for sample D55_01 (page 1 of Table 6), collected from a drum discovered during excavation of the northeast sediment retention pond, indicates the drum contents (solid material) was hazardous with respect to lead and barium. In an email to MPCA staff dated September 8, 2016, Arcadis provided field notes and documentation showing that the 55-gallon drum was shipped off-Site as hazardous waste to a permitted hazardous waste landfill.
4. Although not labeled as such in Table 6, soil samples SP011_A1 and SP011_A2 (pages 10 and 11 of Table 6), are post-stabilization samples for stockpile SP011. Arcadis provided field notes and documentation to clarify this point in an email to MPCA staff dated September 8, 2016. Based on sample results, stabilization was successful and stockpile 11 was disposed of in a Subtitle D landfill as non-hazardous waste.

5.

Please note that this letter is subject to the disclaimers in Attachment A. If you have any questions about this letter, please feel free to contact any of the MPCA staff listed below.

Sincerely,



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cc: Ryan Oesterreich, Arcadis
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Attachment

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.