



Minnesota Pollution Control Agency

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

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February 8, 2013

Mr. Charles Pinter, Senior Environmental Engineer
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, Saint Paul
MPCA VIC Project Number VP23530
2012 UST System Sampling Report Review

Dear Mr. Pinter:

The Minnesota Pollution Control Agency (MPCA) staff in the Voluntary Investigation and Cleanup (VIC) Program has reviewed the "Summary of Underground Storage Tank (UST) Sump Sampling Events Memorandum" (Report), dated December 5, 2012, for the Ford Twin Cities Plant site, located at the address referenced above (the Site). The Report was prepared and submitted on your behalf by ARCADIS U.S., Inc. (ARCADIS).

The Report presents the results of the annual sampling of a sump (Feature 46) within a former waste solvent UST basin (Feature 36) located south of the Paint Building. From approximately 1987 to 1992 the USTs were used to store spent solvents generated during auto body painting operations. Because of the shallow bedrock in this area (the Decorah Shale is six to eight feet below grade), the bottom of the former tank basin is completed several feet into the bedrock.

A release from the UST system was discovered in 1992 and the tanks were subsequently removed during an interim response action conducted under the oversight of the MPCA's Superfund Program. The former UST system was removed from the State Superfund List in 1993, although pumping of the sump and periodic monitoring of the sump discharge was an ongoing requirement. In 2007, MPCA oversight of the annual monitoring of the sump was moved to the VIC Program.

Prior to plant closure in December 2011, perched groundwater that accumulated in the former tank basin was directed to the sump via a drain tile system and then pumped to Ford's wastewater treatment plant. The concentrations of volatile organic compounds (VOCs) in the sump have decreased considerably over the past few years. During the 2012 sump sampling event, all detected VOCs were at concentrations less than the Health Risk Limits established by the Minnesota Department of Health.

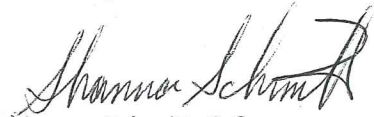
The Report is approved. Although the sump pumping is discontinued, the collection of accumulated water in the sump will need to be monitored and evacuated if necessary. Please submit a plan for discontinuing the sump pumping and initializing regular monitoring of the drain tile system and sump until its demolished and regular monitoring of the three monitoring wells MW-4, MW-5, and MW-6.

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Please note that the Report references a March 23, 1993, document as a Final Record of Decision letter; the document is actually entitled Minnesota Decision Document (MDD).

Please note the disclaimers found in Attachment A. If you have any questions on the above, please contact Shanna Schmitt at 651-757-269 / shanna.schmitt@state.mn.us or Amy Hadiaris at 651-757-2402 /or amy.hadiaris@state.mn.us.

Sincerely,



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

SS:AH:jmp

Attachment

cc: Angharad Pagnon, ARCADIS U.S., Inc.
Merritt Clapp-Smith, City of St. Paul

ATTACHMENT A
DISCLAIMERS
FORD TWIN CITIES PLANT
MPCA VIC PROJECT NUMBER VP23530

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.

