



Minnesota Pollution Control Agency

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May 28, 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, St. Paul
MPCA VIC Project Number VP23530
MPCA PBP Site ID Number PB3682
PIN 05-117-21-13-0016 & 05-117-21-13-0015
Underground Storage Tank Removal Environmental Contingency Plan Approval

Dear Mr. Pinter:

The Minnesota Pollution Control Agency (MPCA) Petroleum Brownfields (PB) and Voluntary Investigation and Cleanup (VIC) Programs staff have reviewed the "Environmental Contingency Plan-Underground Storage Tank Removal" (UST ECP), dated March 9, 2013, for the Ford Twin Cities Plant site located at the address referenced above (the Site). The UST ECP was prepared and submitted on your behalf by Arcadis U.S., Inc. (Arcadis).

The UST ECP describes the screening and testing procedures that will be followed during removal of underground storage tanks (USTs) at the Site, including two spent solvent storage tanks (Feature 35) and several known or potential petroleum USTs.

The UST ECP is hereby approved subject to the following clarifications/modifications:

1. Please refer to MPCA Tank Compliance Rules and Regulations regarding regulated petroleum related USTs. If petroleum contamination is known or detected, please refer to MPCA Petroleum Remediation Program (PRP) guidance regarding sampling requirements.
2. As a correction to the waste solvent tank history described on page two, please note that removal of the four (not three) former solvent tanks and subsequent remediation and monitoring activities were conducted under the oversight of MPCA's Superfund/RCRA program (not PRP). The solvents stored in the former and current solvent USTs are not petroleum as defined by Minn. Statute 115C.
3. The UST ECP proposes to use a photoionization detector (PID) equipped with an 11.7 electron volt (eV) lamp. The PID should be calibrated twice daily (morning and early afternoon) to ensure it is operating properly.
4. For soils within the solvent UST area, if PID readings are elevated above background concentration (as opposed to 10 ppm), the soil shall be considered potentially-impacted and should be sampled for VOCs.

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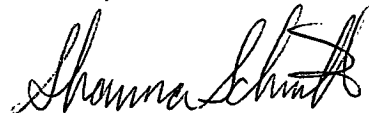
5. Since redevelopment activities will not occur at this Site for some time, typical soil reuse scenarios (e.g. placement under pavement, etc.) are not applicable at this time. Impacted soil shall not be stockpiled for future on-site reuse. Soil excavated from a tank basin can be replaced in the tank basin if it meets applicable criteria. For petroleum-impacted soil, refer to PRP Guidance Document 3-01 (Excavation of Petroleum Contaminated Soil and Tank Removal Sampling). For solvent-impacted soil, refer to the MPCA's Soil Leaching Values (for VOCs) and Soil Reference Values (for metals).

The MPCA VIC and PB Programs require an Environmental Contingency Plan for the entire Site prior to demolition or removal of building slabs and additional sub-grade features or structures. It is unclear whether this UST ECP is meant to include removal of Feature 46 (the sump associated with the former solvent UST basin) and Feature 37 (underground piping related to the solvent USTs). Please let VIC staff know whether these features are within the current scope of work, or if they will be addressed under the pending site-wide ECP. VIC staff would like to be notified about the schedule for demolition and removal of Features 46 and 37.

An implementation report describing the condition of the solvent USTs, screening and sampling results, soil disposal, imported soils, dewatering activities, etc. shall be prepared and submitted to the MPCA within six months following removal of the solvent USTs. If the implementation report cannot be submitted within that timeframe, please notify the MPCA VIC staff of the status of the project. Reporting of the petroleum tank removals should follow PRP guidance.

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 and is contingent on compliance with the terms and conditions set forth herein. If you have any questions on the above, please contact Shanna Schmitt at 651-757-2697 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.

John Meyers, Ford Twin Cities Assembly Plant (email only)

Merritt Clapp-Smith, City of St. Paul (email only)

ATTACHMENT A
DISCLAIMERS
FORD TWIN CITIES PLANT
MPCA PROJECT NUMBER VP23530
MPCA PBP PROJECT NUMBER PB3682

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. § 115B.17, subd. 12.