From: Hadiaris, Amy (MPCA)
Sent: Thursday, May 03, 2018 11:12 AM
To: Chuck Pinter <Ford>
Cc: 'Oesterreich, Ryan' <Arcadis>
Subject: Approval of Arsenic RAP

The purpose of this email is to provide documentation of Minnesota Pollution Control Agency (MPCA) approval of a technical memorandum titled *Arsenic Addendum to the Consolidated Impact Areas Interim Response Action Plan* (Arsenic RAP). The Arsenic RAP, dated June 28, 2017, evolved out of previous discussions between Ford Motor Company, Arcadis U.S. Inc., and the MPCA regarding an appropriate risk-based cleanup goal for arsenic. The cleanup plan proposed in the Arsenic RAP is consistent with previous MPCA direction provided in email correspondence dated December 8, 2016 (excerpt below).

From: Hadiaris, Amy (MPCA)
To: "Oesterreich, Ryan"
Subject: arsenic follow-up
Date: Thursday, December 08, 2016 9:55:00 AM

Thanks, Ryan. Please plan to proceed in accordance with the following MPCA comments:

Arsenic:
Areas outlined in orange on the arsenic figure should be excavated for landfill disposal. This includes the additional areas listed below. Other sampling locations with arsenic exceeding the Industrial SRV have either already been excavated, or are planned to be excavated, in accordance with Response Action Plans already submitted to the MPCA.

- Former railroad tracks (arsenic concentrations ranging from 21 to 650 mg/kg). Practically speaking, I expect this excavation will likely merge with the pending Area A/B remedial excavation, since the railroad tracks (a likely source for this arsenic) extend to that area.
- Three small discrete areas where arsenic exceeded the MPCA Industrial SRV: A086 (31 mg/kg), B081 (21 mg/kg), and C120 (29 mg/kg).

Isolated sample locations in which arsenic exceeds the MPCA Residential SRV of 9 mg/kg do not need to be excavated. These “yellow dots” on the map are few and far between and are surrounded by a sea of green dots. The concentrations of arsenic at these 26 scattered locations ranges from 9.2 to 17 mg/kg. Whether these isolated occurrences are above or below a site-specific background concentration is a moot point; from a risk-based perspective, they are irrelevant.

Amy K. Hadiaris, P.G.
Voluntary Investigation and Cleanup Program
Remediation Division
Minnesota Pollution Control Agency
651.757.2402
amy.hadiaris@state.mn.us