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September 15, 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 Revised Comprehensive Phase II Site Investigation 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 revised Comprehensive Phase II Site Investigation 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.

Thank you for incorporating in the revised Report changes requested by MPCA staff in our letter dated February 19, 2016. The additional detail in the text and the revised figures and tables help make the large volume of data more accessible and easier to interpret. The Report is approved, subject to the following minor clarifications:

- 1. Errata: Section 6.2.2 (page 26) includes the statement "Slightly higher concentrations of chlorinated VOCs were present in the remaining 71 perched groundwater samples." This statement should reference <u>non</u>-chlorinated VOCs.
- 2. Two addendums to the Report will provide supplemental environmental information. A recently submitted Soil Addendum (August 2016) is currently under review. Submittal of a Groundwater Addendum is pending.

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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,

Shanna Schmitt, P.G.

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# 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.