

Dan Krivit

Dear MPCA Staff:

Please download, review, and acknowledge that my attached letter has been successfully uploaded and entered into the official record. Please send an email response.

Thank you, in advance, for your careful consideration of my comments.

Sincerely,

Dan Krivit

Dan Krivit
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February 3, 2026

Amy Hadiaris
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155

RE: Comments on the Ford / Arcadis Feasibility Study for Ford Area C

Dear Ms. Hadiaris:

I respectfully request that MPCA evaluate onsite waste processing options to reduce the need for hauling and off-site disposal. Once this additional evaluation is complete and publicly released, I request that MPCA select Alternative 6 (full cleanup).

I am a long-time resident of St. Paul. Now, I am a nearby neighbor who regularly uses the paths and Mississippi River along Ford Area C. I am an environmental scientist that specialized in solid waste management throughout my 44-year professional career.

I am asking that MPCA and Ford evaluate on-site recycling of the inert construction & demolition (C&D) debris and bioremediation of the industrial waste. This variation of Alternative 6 was not discussed, as far as I know, and should have been evaluated as part of Ford's feasibility study. MPCA has referred to the truck traffic as one of the short-term environmental impacts of Alternative 6 without any discussion of mitigative measures such as on-site recycling and bioremediation. Analysis and public discussion of such mitigative measures is a reasonable and actionable recommendation.

I understand that such a variation for Alternative 6 will also be more expensive than Alternative 4, but the costs and environmental trade-offs of an on-site processing option should have been considered and shared with the public **before** MPCA staff selected a proposed cleanup plan. The facts are that there was not significant public discussion of on-site recycling and bioremediation. This should be corrected before MPCA makes a final cleanup selection.

Several studies have estimated the cost savings of on-site recycling of C&D debris compared to hauling and paying landfill tipping fees. These savings could be in the range of \$8 to \$12 per ton.¹ Using an average of \$10 per ton, this equates to an estimate of about \$3 million in savings compared to off-site landfilling.²

Bioremediation is often more cost-effective than traditional excavation and landfilling of contaminated soils.³ The Ford / Arcadis study cost estimates assumes that the industrial waste materials would be required to be disposed of in a Toxic Substances Control Act (TSCA) disposal facility. Under this assumption, average TSCA-regulated waste disposal often costs in the range of \$200 to over \$500 per ton (including transportation), heavily dependent on the concentration of contaminants, waste form (solid vs. liquid), and transportation logistics.⁴ The average cost of bioremediation for petroleum-contaminated soils, treatment costs are often reported from \$32 to \$73 per U.S. ton with the wide variation due to specifics of treatment technique, contaminant type, and site conditions.⁵ Assuming the highest of these reported costs for bioremediation (\$73 per ton) and the lowest range of reported costs for TSCA-regulated waste (\$200 per ton), this equates to a conservative calculation of about \$127 per ton savings for purposes of this preliminary discussion. Under these assumptions, the total savings due to on-site bioremediation of the industrial waste would be about \$15 million.⁶

This preliminary, rough cost analysis indicates a total of about \$18 million in savings due to on-site recycling of the C&D debris plus bioremediation of the industrial waste. I respectfully request these estimates and assumptions be refined as part of a revised feasibility study.

Apparently, MPCA has *already selected* Alternative 4 according to MPCA staff statements at public meetings and its release of the study: “*The MPCA proposed plan for Area C is Alternative 4.*”⁷ But this process appears to contradict the public notice cover letter released as part of that same email packet which states: “***MPCA Decision: The MPCA seeks public input on the cleanup alternatives described in the Feasibility Study. After the end of the public comment period [emphasis added], the MPCA will choose a cleanup plan for Area C, to be implemented by Ford Motor Company.***”⁸ This apparent contradiction in sequencing of MPCA’s decision relative to the public comments should be corrected by a public release of a revised draft proposed cleanup plan ***after full consideration of all public comments***. Please explain what is the urgency of a MPCA decision. This process is gone on for many years already; a relatively little additional time and community engagement would be of great value to all parties. This additional process step could enhance the credibility and trust in MPCA’s final cleanup selection. Further analysis of on-site recycling and bioremediation is feasible, prudent, and actionable given this and other such public comments offering reasonable variations on Alternative 6.

Please email me a response.

Sincerely,

Dan Krivit

References and Endnotes:

¹ Okon Recycling, *The Importance of On-Site Recycling in Construction*, August 14, 2025. (<https://www.okonrecycling.com/construction-and-demolition-waste/mixed-construction-waste/on-site-recycling-construction/>)

² The Ford / Arcadis “Focused Feasibility Study for Ford Area C” (dated June 2022 and revised October 2025) states on Table 9 that there is about 660,000 cubic yards of C&D wastes estimated by Arcadis for “transport and off-site disposal”. Using a generous/conservative assumption of 1,000 pounds per cubic yard, this equates to 330,000 tons of C&D waste. These estimates and assumptions should be refined as part of a revised feasibility study.

³ Sustainability Directory (20.10.25), *How Does the Cost-Effectiveness of Bioremediation Compare to Traditional Excavation and Disposal?* (<https://sustainability-directory.com/question/how-does-bioremediation-compare-to-traditional-methods-cost-wise/>)

⁴ HWH Environmental, *Hazardous Waste Management by the Numbers: Financial Implications of Hazardous Waste Management*, Web site accessed on Feb 3, 2026. ([https://www.hwhenvironmental.com/financial-implications-hazardous-waste-management/#:~:text=Hazardous%20waste%20disposal%20typically%20costs,factor%20into%20a%20project's%20cost.](https://www.hwhenvironmental.com/financial-implications-hazardous-waste-management/#:~:text=Hazardous%20waste%20disposal%20typically%20costs,factor%20into%20a%20project's%20cost.;)); and

Angi, *Hazardous Waste Disposal Cost [2026 Data]*, Updated Dec 15, 2025. (<https://www.angi.com/articles/hazardous-waste-disposal-cost.htm>)

⁵ Chemtech International, *Understanding Bioremediation Costs: Planning a Bioremediation Process*, (August 3, 2022. (<https://chemtech-us.com/understanding-bioremediation-costs-planning-a-bioremediation-process/#:~:text=Overall%20Bioremediation%20Cost%20Ranges,keep%20track%20of%20bioremediation%20costs>)

⁶ The Ford / Arcadis Focused Feasibility Study states on Table 9 that there is about 75,000 cubic yards of industrial wastes estimated by Arcadis for “transport and off-site disposal”. Using a generous/conservative assumption of 3,200 pounds per cubic yard, this equates to 120,000 tons of industrial waste. These estimates and assumptions should be refined as part of a revised feasibility study.

⁷ MPCA staff email dated Wed Nov 5, 2025; “MPCA Public Notice – Ford Twin Cities Plant ‘Area C’, Focused Feasibility Study...”

⁸ MPCA Public Notice: “Request for comments on draft Area C Feasibility Report,”, November 5, 2025.