

Bruce Hoppe

To whom it may concern:

I am a previous longtime resident of the Highland Park neighborhood with a fair knowledge base on the Ford site. I do assert that Ford and MPCA have incorrectly assumed a static groundwater condition under this waste site.

Hydrodynamics: The floodplain burial of industrial wastes exposes the materials to frequent flooding from River water and groundwater hydrodynamics as the waste area is periodically flooded and drained. I believe that the regulatory standards supported by Ford and adopted by MPCA are not appropriate. Further, the residential housing now being built up above this waste site changes the decision drivers to stop "kicking the can down the road" and mandate a full cleanup and rehabilitation of this once pristine riverscape back to useable parkland - similar to nearby Hidden Falls Park.

It is clear that the environmental risks have never been fully assessed (or reported)-

- Inorganics: Heavy metals and toxins (Even Thallium and Cyanide were reported as potential risks from the dump but sampling was inclusive)
- Organic chemicals are said to be within the dump footprint: PAH's, PCB, VOC (DRO, GRO)

The proposed site cleanup should not have to fall completely on Ford since access to the waste has been made difficult due to City / County/ US Army Corps construction debris deposited on top of Ford's waste pile - there should be some cleanup cost-sharing approach that could be agreed to.

Finally, I attached some useful public records that should be made available as part of public comments. They do a good job technically describing the risks and site details. Thank you, Bruce Hoppe