

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action Environmental Indicator (EI) RCRA Info code (CA750)

Migration of Contaminated Groundwater Under Control

Facility Name: RACER Trust – PCC Validation

Facility Address: 200 South Boulevard West, Pontiac, Michigan

Facility EPA ID #: MID 980 568 836

1. Has **all** available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 X If yes - check here and continue with #2 below.

 If no - re-evaluate existing data, or

 if data are not available, skip to #8 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRA Info national database ONLY as long as they remain true (i.e., RCRA INFO status codes must be changed when the regulatory authorities become aware of contrary information).

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2. Is **groundwater** known or reasonably suspected to be "**contaminated**"¹ above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

X If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

_____ If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

_____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

The occurrence of groundwater at the site and the screening criteria for identifying "contaminated" groundwater are discussed in Section 3.0 of the CA750 Report (CRA, 2013a), the Addendum to the CA750 Report (CRA, 2013b), and the 2015 Annual Groundwater Monitoring Report (CRA, 2015a). Comparison of the groundwater data with the screening criteria is summarized in Tables 2-5 of the CA 750 Report, Table 1 of the Addendum, and Table 1 of the 2015 Annual Groundwater Monitoring Report. As discussed in Section 3.1 of the CA 750 Report and Section 3.0 of the 2015 Annual Groundwater Monitoring Report, the screening criteria include the most applicable and restrictive MDEQ Part 201 Cleanup Criteria except Groundwater to Surface Water Interface (GSI) Criteria which was determined to be not to be relevant based upon investigation and professional judgment per NREPA Section 324.20120e(3)(a-h) [see also June 19, 2014 NREPA SECTION 324.20120e(3)(a-h) GSI EVALUATION (CRA, 2014a)] and Acute Inhalation Screening Level which was removed from Part 201 criteria in 2014.

In 2015 (CRA, 2015a), volatile organic compounds (VOCs) meeting the definition of "contaminated" were present at MW74-08 and MW91-12. 1,1,1-Trichloroethane, 1,1-Dichloroethene and Trichloroethene (TCE) were detected at MW74-08 above Part 201 Drinking Water Criteria (DWC). TCE was detected at MW91-12 above DWC. Carbon tetrachloride was present above DWC at MW85-12. TCE is also present above DWC at MW02-07 in the northwest corner of the site. Vinyl chloride met the definition of "contaminated" off-site in the northern portion of the site at MW92I-13 in previous sampling events, but is currently below screening criteria (CRA, 2015a). Additionally, the other off-site monitoring wells down gradient of MW2-07 and MW92I-13 do not have VOCs above DWC.

Metals met the definition of "contaminated" as identified below:

- Aluminum exceeded Michigan Part 201 Residential Health-Based DWC (0.3 mg/L) at MW21-07, MW11-07, MW19-07, MW32-07, MW33-07, MW34-07, MW35-07, MW68-08, MW74-08, MW82-12, MW85-12, MW87-12 and MW92S/I-13.

- In 2012, only MW82-12 exceeded U.S. EPA's 2015 Regional Screening Level (RSL) for Tapwater (20 mg/L); however from 2013 to 2015, there were no exceedences of the RSL here or at other wells.
- Aluminum exceeded site-specific background soil concentrations in only one location at 5 feet below ground surface and does not appear to be related to former facility operations.

- Arsenic exceeded DWC (0.01 mg/L) at MW35-07, MW63-08, MW64-08 and MW88-12.

- While there were some on-site detections of Arsenic exceeding the Residential and Non-Residential DWC (at a maximum of 0.049 mg/L), they appear to be discontinuous and no

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facility boundary wells exceeded this criteria in 2013 (CRA, 2013b). • Arsenic exceeded site-specific background soil concentrations in only one location at 10 feet below ground surface and does not appear to be related to former facility operations. • Iron exceeded Residential and Non-Residential Health-Based DWC (2 mg/L and 5.6 mg/L, respectively) at MW10-07, MW33-07, MW48-07, MW64-08, MW81-12, MW88-12, and MW92S/I-13. • In 2012, only MW82-12 exceeded U.S. EPA's 2015 Regional Screening Level (RSL) for Tapwater (14 mg/L); however in 2013 there were no exceedences of the RSL here or at other wells. • Lead exceeded DWC (0.004 mg/L) at MW21-07 and MW33-07. • In 2015, Lead had one exceedence of the U.S. EPA lead action level (0.015 mg/L) at one down-gradient facility boundary well (MW33-07: 0.017 mg/L). All other on-site wells were below the lead action level. • Lead exceeded non-residential drinking water protection criteria in soil at only one location at 10 feet below ground surface. • Manganese exceeded Residential and Non-Residential Health-Based DWC (0.86 mg/L and 2.5 mg/L, respectively) at MW2-07, MW92S -13. • Manganese was identified at off-site northwest area wells MW81-12 and MW92S/I-12 at up to 4.6 mg/L. Manganese is delineated to the south and east. Figure 14 of the CA750 Report (CRA, 2013a) provides a site map with manganese contours delineating groundwater off-site to the extent possible. All on-site Manganese groundwater levels were less than the health based RDW except MW02-07 at NW corner of site at 2.15 mg/L. Manganese does not appear to be site related as all other on-site wells were less than the health based RDW and site soils were below site specific background values. • Vanadium exceeded Residential and Non-Residential Health-Based DWC (0.0045 mg/L and 0.062 mg/L, respectively) at MW33-07, MW35-07 and MW82-12. • In 2012, only MW82-12 exceeded U.S. EPA's 2015 Regional Screening Level (RSL) for Tapwater (0.086 mg/L); however from 2013 to 2015, there were no exceedences of the RSL here or at other wells. • Site soils did not exceed screening criteria for vanadium. Light nonaqueous-phase liquids (LNAPLs) consisting of weathered petroleum (e.g. diesel fuel, kerosene) is present in monitoring wells MW69-08, MW84-12, and MW86-12.
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Footnotes:

¹"Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

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3. Has the **migration** of contaminated groundwater **stabilized** (such that contaminated groundwater is expected to remain within “existing area of contaminated groundwater”² as defined by the monitoring locations designated at the time of this determination)?

 X If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the “existing area of groundwater contamination”².

 If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the “existing area of groundwater contamination”²) - skip to #8 and enter “NO” status code, after providing an explanation.

 If unknown - skip to #8 and enter “IN” status code.

Rationale and Reference(s):

A detailed discussion of the migration of contaminated groundwater and rationale as to why contaminated groundwater is expected to remain within the dimensions of the “existing area of groundwater contamination” is presented in Section 4.0 of the CA750 Report (CRA, 2013a), the Addendum to the CA750 Report (CRA, 2013b), the June 19, 2014 Response to Comments (CRA, 2014b), and the September 12, 2014 Southern Dissolved VOC Area Memorandum (CRA, 2014c). Updated geologic cross sections are presented in the 2015 Annual Groundwater Monitoring Report (CRA, 2015a).

Two areas of VOC impacted groundwater are located at the site, including the southern dissolved VOC area (located in the southern portion of the site, see CRA, 2015) and along the northwestern boundary.

Southern VOC Area

- MW94-15 was installed to define the lateral up-gradient (east) extent of impacted groundwater in the southern dissolved VOC area (located in the southern portion of the site, see CRA, 2015a). Based on the most current geologic cross-sections (see CRA, 2015a cross section A-A'), the impacted groundwater in the southern dissolved VOC area extends laterally up-gradient to MW94-15 and down-gradient to the edge of former Plant 3 where the groundwater unit is no longer present. It appears the saturated unit was removed in the down-gradient (west) direction during installation of the western portion of Former Plant 3 when the elevation of the base drops from 956 to 944 AMSL. Analytical results from groundwater collected from the down-gradient monitoring well TMW70-08, MW37-07, and MW82-12 were non-detect for VOCs. Up-gradient monitoring well MW94-15 did not produce enough groundwater to collect a sample. The area is delineated to the north by clean monitoring wells MW68-08 and MW87-12 and to the south by clean monitoring wells MW88-12 and MW90-12 which do not exceed criteria. Based on the data from current/historic surrounding wells and geology (see CRA, 2015a cross sections A-A' and B-B'), the lateral extent of VOC impacts in the southern dissolved VOC area are delineated on-site, limited in nature, staying within the existing area of groundwater contamination, and migration appears to be under control.
- MW74D-15 was installed to define the vertical extent of impacted groundwater. Based on the most current geologic cross-sections (see CRA, 2015a cross section A-A'), the impacted groundwater in the southern dissolved VOC area extends from a depth of 12 to 15 feet below ground surface (bgs) and is underlain by non-saturated, less permeable units. A three foot sand unit is encountered at approximately 25 feet bgs; however, it was not saturated. The lower

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saturated sand unit is encountered at approximately 40 feet bgs (lower aquifer). Analytical results from two rounds of groundwater sampling collected from the lower aquifer at MW74D-15 were non-detect for VOC. Based on the data collected from MW74D-15, current/historic data from surrounding wells and geology (see CRA, 2015 cross section A-A'), there does not appear to be vertical migration of impacts in the Southern dissolved VOC area.

Northwestern Boundary

- The lateral extent of VOC contaminated groundwater is defined on-site along the northwestern property boundary at MW2-07 and TMW2I-12. In April 2015, MW2-07 exceeded DWC for TCE. Monitoring well TMW2I-12 exceeded DWC for TCE; however it was collected from a temporary well as a one-time event in 2012 and current results (2014-2015) from the off-site monitoring wells present more reliable data. Therefore, to delineate the TCE impacts, MW92S/I-13, MW93I-13, MW81-12, and MW80-12 were installed down-gradient of MW2-07 and TMW2I 12 along the ROW located on the north side of Franklin Street. Results from 2014-2015 at these monitoring wells indicated no VOCs were detected above laboratory reporting limits except VC; however, VC did not its exceed MDEQ Part 201 Drinking Water Criteria. Therefore, the extent of VOC impacts along the northwestern property boundary are delineated, limited in nature and migration appears to be under control.
- Based on the most current geologic cross-sections (see CRA, 2015a cross section B-B'), the impacted groundwater along the northwestern property boundary extends from a depth of 18 to 21 feet bgs and is underlain by non-saturated units until the lower aquifer is encountered at approximately 40 feet bgs. MW79-12 was installed approximately 90 feet up-gradient of MW2-07 and screened in the lower aquifer unit. Analytical results from groundwater collected at up-gradient monitoring well MW79-12 were non-detect. Down-gradient wells VOC results, as described above, are non-detect or below the drinking water criteria.

Based on the data collected from MW79-12 and down-gradient wells, current/historic data from surrounding wells and geology (see CRA, 2015 cross section B-B'), there do not appear to be vertical or lateral migration of impacts along the northern property boundary.

The on-site extent of LNAPL was defined through the usage of a Laser Induced Fluorescence (LIF) investigation in 2009. The facility ceased operations in 2005; thus, there is greater potential for footprint stability due to smearing of LNAPL within soil and weathering of LNAPL through dissolution, biodegradation and volatilization. In July 2014, bulkheading of sewers was completed resulting in no connected storm sewer through impacted areas above GSI or LNAPL that vent to a surface water body. The 2015 LNAPL thickness at MW69-08 and MW84-12 was less than 1 inch. The extent of LNAPL defined by the LIF investigation was further verified by the placement of sentinel wells outside of the LNAPL zone. The sentinel wells have remained free of LNAPL. Two soil borings were placed in the areas of greatest LNAPL thickness as identified by the LIF survey. These borings were subjected to ultraviolet light to fluoresce the highest saturations of LNAPL within the core. Subsamples from the high fluorescence locations were subject to water drive and pore fluid saturation tests to determine potential for NAPL mobility. The Water Drive and Pore Fluid Saturation test results indicate that the LNAPL is present at residual/immobile saturation levels with the exception of a portion of the impacted zone at MW84-12. At MW84-12, three subsamples representing the most impacted parts of the vertical LNAPL zone were tested, with only one exhibiting a saturation in the potentially mobile range. No LNAPL has been observed in wells placed outside of the LIF investigation boundaries. The extent of LNAPL is defined and its migration is under control.

Carbon tetrachloride was detected at MW85-12 which is located north of the LNAPL area. However, it is unlikely the detection of carbon tetrachloride is associated with the LNAPL area. Analytical results of soil and groundwater do not indicate carbon tetrachloride is present in soil at MW85-12 or within the

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LNAPL plume. Prior to the 2015 groundwater detection, carbon tetrachloride had not been detected above reporting limits in soil or groundwater at the site.

In July 2014, CRA performed a water well survey within a 2 mile radius of the site (CRA, 2014d). No downgradient drinking water wells were identified.

² "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

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4. Does "contaminated" groundwater **discharge** into **surface water** bodies?

- _____ If yes - continue after identifying potentially affected surface water bodies.
- X If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
- _____ If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s):

No surface water bodies exist at the site. The site is located within the Clinton River and Rouge River drainage basins. The Clinton River is located approximately 0.75 miles north of the site while the Rouge River is located approximately 3.5 miles southeast of the site. Several surface water bodies and intermittent drains are also located within a mile of the site, including Crystal Lake, which is approximately a half mile to the west of the site. These water bodies are part of the Clinton River watershed which ultimately migrates east over a minimum distance of 26 miles towards the St. Clair River, and becomes part of the Great Lakes water system.

Investigation was completed as part of the Phase III ESA to identify potential pathways for off-site migration of contamination to a surface water body. During a conference call on September 28, 2011, the EPA requested additional investigation of storm sewers as potential conduits for off-site migration and potential site exit points. During the 2012 Phase III ESA, storm sewer depths were measured and two monitoring wells (MW82-12 and MW83-12) were installed in or immediately adjacent to the bedding of the utility corridor. The two monitoring wells were installed along the western boundary of the site and represent potential site exit points. Groundwater samples were collected for analysis of PCBs, SVOCs and VOCs and no contaminants exceeded Part 201 criteria (except limited metals) at MW82-12 and MW83-12.

Storm sewer lines in the area of LNAPL and southern dissolved VOC areas were cut and bulkheaded in July 2014 (CRA, 2014e). Upon completion of the bulk-heading, there remains no active storm sewer present within the LNAPL area or the southern dissolved VOC area that could allow contaminated groundwater to discharge to a surface water body. Groundwater to Surface Water Interface (GSI) Criteria was determined to be not to be relevant based upon investigation and professional judgment per NREPA Section 324.20120e(3)(a-h) [see also June 19, 2014 NREPA SECTION 324.20120e(3)(a-h) GSI EVALUATION (CRA, 2014d)].

Based on the surface water bodies located over 1,000 feet from the downgradient extent of contaminated groundwater to the north and northwest of the site, the point source sewer investigation and bulkheading, discharge of contaminated on-site or off-site groundwater to surface water bodies is not occurring. Based on the absence of groundwater discharges to surface water, Questions 5 and 6 are not applicable.

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5. Is the **discharge** of “contaminated” groundwater into surface water likely to be “**insignificant**” (i.e., the maximum concentration³ of each contaminant discharging into surface water is less than 10 times their appropriate groundwater “level,” and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

_____ If yes - skip to #7 (and enter “YE” status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ of key contaminants discharged above their groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

_____ If no - (the discharge of “contaminated” groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration³ of each contaminant discharged above its groundwater “level,” the value of the appropriate “level(s),” and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations³ greater than 100 times their appropriate groundwater “levels,” the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

_____ If unknown - enter “IN” status code in #8.

Rationale and Reference(s):

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³ As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the **discharge** of “contaminated” groundwater into surface water be shown to be “**currently acceptable**” (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented⁴)?

_____ If yes - continue after either:

- 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site’s surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR
- 2) providing or referencing an interim-assessment,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim-assessment (where appropriate to help

_____ If no - (the discharge of “contaminated” groundwater can not be shown to be “**currently acceptable**”) - skip to #8 and enter “NO” status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

_____ If unknown - skip to 8 and enter “IN” status code.

Rationale and Reference(s):

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⁴ Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

⁵ The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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7. Will groundwater **monitoring** / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the “existing area of contaminated groundwater?”

 X If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the “existing area of groundwater contamination.”

 If no - enter “NO” status code in #8.

 If unknown - enter “IN” status code in #8.

Rationale and Reference(s):

RACER will monitor groundwater wells for VOCs to ensure migration remains under control under a pending modification to the November 21, 2013 Sampling and Analysis Plan. Additionally, the site currently has groundwater use restrictions and an additional groundwater use restriction ordinance will be proposed to the City of Pontiac for properties surrounding the site on the south, west, north, and northwest sides of the property.

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8. Check the appropriate RCRA INFO status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

X YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the RACER Trust – PCC Validation facility, EPA ID # MID 980 568 836, located at 200 South Boulevard West, Pontiac, Michigan. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

____ NO - Unacceptable migration of contaminated groundwater is observed or expected.

____ IN - More information is needed to make a determination.

Completed by:



Date

3/1/16

Peter Ramanauskas

Environmental Scientist

Supervisor:



Date

3/3/16

Mike Beedle

CAS1 Section Chief

EPA Region 5

Locations where References may be found:

USEPA Region 5 has the following documents, which support the determination.

- 2006 and 2009 Phase I ESAs (CRA, 2006a, CRA, 2006b, and CRA, 2009a)
- Phase II Environmental site Assessment Work Plan (CRA, 2007)
- Memorandum – Quantitative Risk Assessment Results (ENVIRON, 2008)
- Phase II Environmental site Assessment (North Parcel) (CRA 2009b)
- Phase II Environmental site Assessment (South Parcel), (CRA 2009c)
- Memorandum – LNAPL Recovery Memo (CRA 2010)
- Draft Current Conditions Report (CRA 2011)
- Supplemental Current Conditions Report, (CRA 2012a)
- Sampling and Analysis Plan and Fundamental Quality Assurance Project Plan, (CRA 2012b)
- RCRA EI CA725 Report (CRA 2013a)
- Addendum to the RCRA EI CA750 Report (CRA, 2013b)

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- RCRA EI CA750 Report (CRA 2013c)
- RCRA Corrective Measures Proposal (CRA, 2013d)
- 2014 Annual Groundwater Monitoring Report (CRA, 2014a)
- 2014 Storm Sewer Bulkhead Completion Memorandum (CRA, 2014b)
- 2015 Annual Groundwater Monitoring Report (CRA, 2015)

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