November 18, 2014

Mr. Peter Ramanauskas
U.S. Environmental Protection Agency Region 5
77 W. Jackson Blvd.
LU-9J
Chicago, IL 60604

RE: Proposed Addendum #2 to the Evaluation of Groundwater/Leachate Collection and Discharge System Work Plan
RACER Trust Property – Toledo, Ohio

Dear Mr. Ramanauskas:

This letter presents Addendum #2 to the Evaluation of Groundwater/Leachate Collection and Discharge System Work Plan (Work Plan) to be conducted at the RACER Trust Property (Site) in Toledo, OH. This Addendum covers modifications to monitoring well installation, groundwater analyses, and surface water analyses.

MONITORING WELL INSTALLATION

Based upon a teleconference meeting, which took place on August 20, 2014 between U.S. EPA, RACER, and CRA, it was determined that additional groundwater monitoring locations should be installed. This determination was based on the results gathered under Addendum #1 in which drive-point piezometers were installed in the bottom of the western ditch of the Former Disposal Area (FDA).

Four 1" diameter drive-point piezometers were installed in December 2013 in the western ditch of the FDA to monitor groundwater quality upgradient and downgradient of MW146-12. However, several attempts in 2014 to collect groundwater samples from the drive-point piezometers were unsuccessful. Therefore, it was determined to abandon the drive-point piezometers and install three new monitoring wells to the west of the FDA. Figure 1 shows the approximate locations of the new groundwater monitoring wells.

MW146-12 has detected PCBs and Vinyl Chloride above the screening criteria in each of the sampling events. Therefore, the new groundwater monitoring wells will be installed west of the western ditch of the FDA upgradient and downgradient of MW146-12 to determine if there is impact outside the boundaries of the FDA.

Installation of the monitoring wells will be done in accordance with the approved Work Plan.

GROUNDWATER SAMPLING AND ANALYSES

RACER proposes to simplify the groundwater parameters for the existing groundwater wells in order to save sampling time and laboratory costs. Table 3.1 of the Work Plan lists the analytical parameters to be run for all groundwater samples collected under the Work Plan. To date, only PCBs and VOCs have been detected above the screening criteria. Therefore, RACER wishes to only sample the existing wells for total and dissolved PCBs and total VOCs.

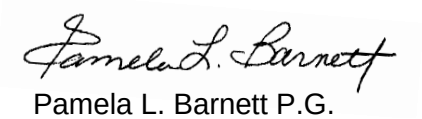
The three new monitoring wells will be sampled for all the parameters listed in Table 3.1 and the existing monitoring wells will sampled for total and dissolved PCBs and total VOCs only. All wells will be samples on a semi-annual basis. This should provide enough data to determine whether or not to continue sampling any wells for the full set of parameters listed in Table 3.1.

SURFACE WATER SAMPLING AND ANALYSES

During each of the semi-annual groundwater sampling events surface water samples will be collected from Silver Creek. Three surface water samples will be collected and analyzed for the full set of parameters listed in Table 3.1. Figure 1 shows the approximate locations of where the surface water samples will be collected. The surface water analyses will be used to determine if the FDA or FSP are impacting Silver Creek.

Should you have any questions on the above, please do not hesitate to contact me.

Yours truly,



Pamela L. Barnett P.G.
Assemble Region Cleanup Manager (DE, LA, MA, OH, PA, VA)
RACER Trust

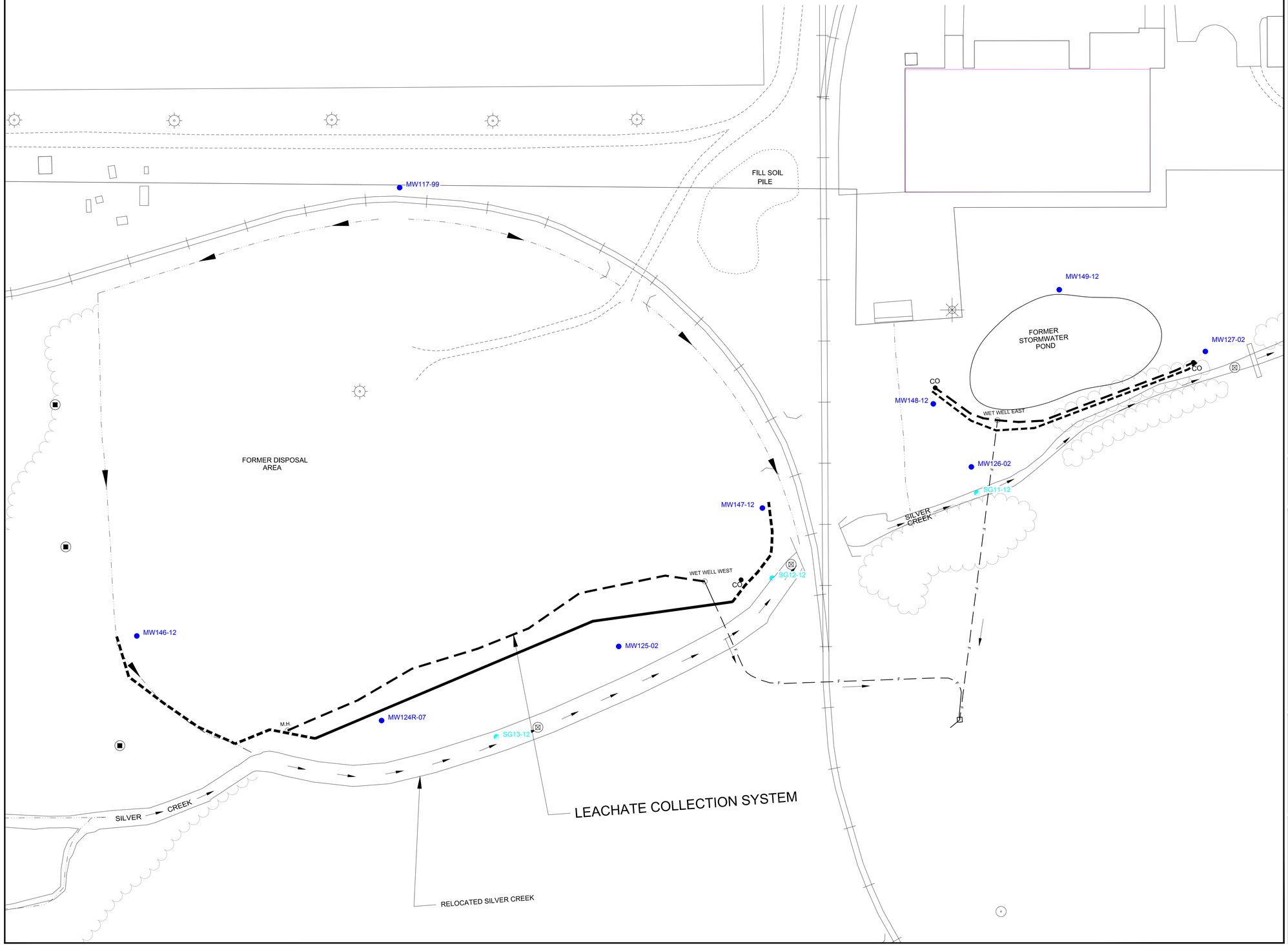
TABLES

TABLE 3.1

ANALYTICAL PARAMETERS
RACER SITE 1099, TOLEDO 103C LANDFILL
TOLEDO, OHIO

Dissolved Metals	*General Chemistry*	*Volatile Organic Compounds*		*Semi-Volatile Organic Compounds*		*PCBs*
Aluminum	Alkalinity, Total (as CaCO3)	1,1,1,2-Tetrachloroethane	Bromodichloromethane	1,2,4-Trichlorobenzene	Benzo(a)anthracene	Aroclor-1016 (PCB-1016)
Antimony	Ammonia	1,1,1-Trichloroethane	Bromoform	1,2-Dichlorobenzene	Benzo(a)pyrene	Aroclor-1221 (PCB-1221)
Arsenic	Biochemical Oxygen Demand (BOD)	1,1,2,2-Tetrachloroethane	Bromomethane (Methyl Bromide)	1,2-Diphenylhydrazine	Benzo(b)fluoranthene	Aroclor-1232 (PCB-1232)
Barium	Chemical Oxygen Demand (COD)	1,1,2-Trichloroethane	Carbon disulfide	1,3-Dichlorobenzene	Benzo(g,h,i)perylene	Aroclor-1242 (PCB-1242)
Beryllium	Chloride	1,1-Dichloroethane	Carbon tetrachloride	1,4-Dichlorobenzene	Benzo(k)fluoranthene	Aroclor-1248 (PCB-1248)
Cadmium	Cyanide (total)	1,1-Dichloroethene	Chlorobenzene	1-Methylnaphthalene	bis(2-Chloroethoxy)methane	Aroclor-1254 (PCB-1254)
Calcium	Dissolved Organic Carbon (DOC)	1,1-Dichloropropene	Chlorobromomethane	2,2'-oxybis(2-Chloropropane)	bis(2-Chloroethyl)ether	Aroclor-1260 (PCB-1260)
Chromium	Fluoride	1,2,3-Trichlorobenzene	Chloroethane	2,3-Dichlorophenol	bis(2-Ethylhexyl)phthalate	
Cobalt	Hardness	1,2,3-Trichloropropane	Chloroform (Trichloromethane)	2,4,5-Trichlorophenol	Butyl benzylphthalate	
Copper	Nitrate (as N)	1,2,4-Trichlorobenzene	Chloromethane (Methyl Chloride)	2,4,6-Trichlorophenol	Carbazole	
Iron	Nitrite (as N)	1,2,4-Trimethylbenzene	cis-1,2-Dichloroethene	2,4-Dichlorophenol	Chlordane	
Lead	Oil and Grease	1,2-Dibromo-3-chloropropane (DBCP)	cis-1,3-Dichloropropene	2,4-Dimethylphenol	Chrysene	***Total Petroleum Hydrocarbons***
Magnesium	Orthophosphate	1,2-Dibromoethane (Ethylene Dibromide)	Cymene (p-Isopropyltoluene)	2,4-Dinitrophenol	Dibenz(a,h)anthracene	
Manganese	pH (water)	1,2-Dichlorobenzene	Dibromochloromethane	2,4-Dinitrotoluene	Dibenzofuran	Volatile Petroleum Hydrocarbons
Mercury	Phenolics (Total)	1,2-Dichloroethane	Dibromomethane	2,6-Dinitrotoluene	Diethyl phthalate	Extractable Petroleum Hydrocarbons
Nickel	Phosphorus	1,2-Dichloroethene (total)	Dichlorodifluoromethane (CFC-12)	2-Chloronaphthalene	Dimethyl phthalate	
Potassium	Sulfate	1,2-Dichloropropane	Ethylbenzene	2-Chlorophenol	Di-n-butylphthalate	
Selenium	Sulfide	1,3,5-Trimethylbenzene	Hexachlorobutadiene	2-Methylnaphthalene	Di-n-octyl phthalate	
Silver	Sulfite	1,3-Dichlorobenzene	Isopropylbenzene	2-Methylphenol	Fluoranthene	
Sodium	Total Dissolved Solids (TDS)	1,3-Dichloropropane	Methylene chloride	2-Nitroaniline	Fluorene	
Thallium	Total Kjeldahl Nitrogen (TKN)	1,4-Dichlorobenzene	Naphthalene	2-Nitrophenol	Hexachlorobenzene	
Vanadium	Total Organic Carbon (TOC)	2,2-Dichloropropane	n-Butylbenzene	3&4-Methylphenol	Hexachlorobutadiene	
Zinc	Total Suspended Solids (TSS)	2,4-Dichlorophenol	n-Propylbenzene	3,3'-Dichlorobenzidine	Hexachlorocyclopentadiene	
		2-Butanone (Methyl Ethyl Ketone)	Styrene	3-Nitroaniline	Hexachloroethane	
		2-Chloroethyl vinyl ether	tert-Butylbenzene	4,6-Dinitro-2-methylphenol	Indeno(1,2,3-cd)pyrene	
		2-Chlorotoluene	Tetrachloroethene	4-Bromophenyl phenyl ether	Isophorone	
		2-Hexanone	Toluene	4-Chloro-3-methylphenol	Naphthalene	
		2-Phenylbutane (sec-Butylbenzene)	trans-1,2-Dichloroethene	4-Chloroaniline	Nitrobenzene	
		4-Chlorotoluene	trans-1,3-Dichloropropene	4-Chlorophenyl phenyl ether	N-Nitrosodimethylamine	
		4-Methyl-2-Pentanone (Methyl Isobutyl Ketone)	Trichloroethene	4-Methylphenol	N-Nitrosodi-n-propylamine	
		Acetone	Trichlorofluoromethane (CFC-11)	4-Nitroaniline	N-Nitrosodiphenylamine	
		Acrolein	Vinyl acetate	4-Nitrophenol	Pentachlorophenol	
		Acrylonitrile	Vinyl chloride	Acenaphthene	Phenanthrene	
		Benzene	Xylene (total)	Acenaphthylene	Phenol	
		Bromobenzene		Anthracene	Pyrene	
				Benzidine		

FIGURES



No	Revision	Date	Initial

N

0 20 40ft

LEGEND

- PROPOSED MONITORING WELL LOCATION
- PROPOSED SURFACE WATER SAMPLE LOCATION
- MW127-02 MONITORING WELL LOCATIONS
- TREE LINE
- SILVER CREEK
- SG11-12 STAFF GAUGE LOCATIONS (NOT USED IN CONTOUR)
- LEACHATE COLLECTION SYSTEM
- M.H. MANHOLE
- CO CLEANOUT
- WET WELL WET WELL
- SHEET PILE WALL
- F FORCEMAIN

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

Approved

DRAWING STATUS

Status	Date	Initial

PROPOSED MONITORING WELL AND SURFACE WATER SAMPLE LOCATIONS

TOLEDO, OHIO

RACER PROPERTY

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:

Project Manager:	Reviewed By:	Date:	
A. L.	A. L.	NOVEMBER 2014	
Scale: 1:40'	Project No.: 012609-T01	Report No.: PRES014	Drawing No.: 1

012609-T01(PRES014)GN-DE001 NOV 10/2014