INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

December 30, 2020

VIA E-MAIL

Mr. Robert W. Hare
Cleanup Manager
RACER Trust
1505 Woodward Ave., Suite 200
P.O. Box 43859
Detroit, MI 48226

Dear Mr. Hare:

Re: Approval of Final Corrective Measures Proposal
RACER Trust
Site No. 13200
Dr. Martin Luther King Jr. Boulevard Site
Anderson, Indiana
IND980700801

IDEM reviewed the November 16, 2020, *Response to IDEM Comments* (VFC # 83072183) submitted by GHD Services Inc. (GHD) for RACER Trust's Dr. Martin Luther King Jr. Boulevard site. The document was submitted in response to IDEM's comments concerning the July 7, 2020, *Final Corrective Measures Proposal* (VFC # 83002010). The *Final Corrective Measures Proposal* is hereby approved with the following comments:

- GHD rejected IDEM's request to add high resolution site characterization (HRSC) procedures as a potential contingency measure in the corrective measures proposal (CMP). IDEM proposed adding this method to the contingency measures due to previous unsuccessful site investigations in determining the source of subsurface chlorinated compounds that are likely responsible for the on-going groundwater contamination. We believe adding the HRSC approach to the CMP's contingency measures does not lock RACER into using it, but establishes the expectation for a comprehensive approach to addressing potential future harm to human health and the environment. If GHD chooses not to incorporate HRSC in the CMP, and adverse conditions later arise, IDEM may require RACER to conduct further site investigation instituting procedures comparable to the HRSC approach.

- In response to IDEM's comment 4, the November 16th submittal states: "GHD and RACER Trust agree that the Tract B (South) ERC should include a soil

management restriction, but believe that the Soil Management Plan (SMP) is best prepared by those planning on completing any construction within the tract." GHD and RACER Trust have performed the investigation and remediation activities at the site. GHD and RACER Trust have all the files, know where all the contaminants are located, and are aware of the exposure scenarios that are being used to justify leaving those contaminants in place. Based on these facts, GHD and RACER Trust should prepare and submit a draft SMP for Tract B (South). IDEM recognizes that the SMP might need to be revised in the future, based on redevelopment plans; however, the redeveloper will be better informed of what is needed to redevelop the property if there is an IDEM-approved SMP already in place.

The final corrective measures may now be implemented at the site in accordance with the CMP project schedule. If you have questions, please contact Robert Marshall at (317) 232-4534 or rmarshal@idem.IN.gov.

Sincerely,

Donald W. Stilz, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

REM
cc: Robert Catallo, GHD
Shannon Richardson, GHD
Thierry Liberge, IDEM
Namrata Patel, IDEM
Patricia Troth, IDEM