



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Commissioner

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VIA e-mail: rhare@racertrust.org

November 14, 2011

Mr. Robert W. Hare, Cleanup Manager
RACER Trust
2930 Ecorse Road
Ypsilanti, MI 48198

Re: RACER Trust
Proposal for Sample Reduction
MLC# 1325, AGT Impoundment
2701 W. Raymond Street, Indianapolis

IDEM has reviewed your September 18, 2011 proposal (Virtual File Cabinet #63575046) to change the ground water sample frequency listed in the January 26, 2007 effective Post-Closure Permit. Specifically, RACER Trust would like to reduce ground water quality sampling frequency from semi-annually to annually at the AGT surface impoundment.

The first technical issue the proposal addresses is the breakthrough time through the slurry wall. The proposal provides documentation detailing the breakthrough time through the slurry wall assuming a natural gradient across the site. The breakthrough documentation adequately addresses the existing properties of the ground water flow that would act on a release from the regulated unit. However, a release is more likely to occur because of a physical breakdown of the slurry properties or variation in the construction of the slurry curtain. Therefore, it is necessary to address the calculation of potential ground water flow without engineering controls in place. Your proposal adequately shows the projected time of travel of ground water flow from the waste to the monitoring wells of less than 30 days. If a release occurs, it is apparent collecting an independent sample is feasible every 30 days. Thus, it is possible every 90 days to complete the statistical test with the proposed verification samples. Please note that if the hydraulic head difference cannot be maintained, the ground water quality sample frequency will need to be changed back to semi-annual from annual basis.

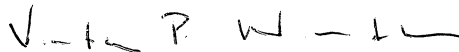
Lastly, the proposal includes an evaluation of the current distribution of the ground water quality, identifying cyclic trends. The discussion in the proposal adequately addresses the potential importance of a specific time of the year to collect the ground water quality samples. IDEM agrees with the conclusion that a significant loss of data will not occur by changing the time of year ground water quality sampling is collected.

Overall, the technical content in the proposal is acceptable. IDEM recommends you submit a Class 1 Modification with prior approval for the reduction of collecting ground water quality samples. The modification should:

- Indicate the authority of the modification [Appendix I to 40 CFR 270.42, Section O-Burden Reduction, Number 5-Changes to the detection and compliance monitoring program under 264.98(d)]
- Why the modification is needed;
- Describe the exact changes to be made to the permit conditions, attachments, and appendices;
- Provide for semi-annual evaluation and reporting of the hydraulic head measurements;
- Provide for taking the annual ground water quality samples during the semi-annual event immediately preceding a hydraulic monitoring event that fails the hydraulic head separation required in the permit; and
- Provide for changing frequency of ground water quality sampling events to semiannual if the hydraulic head difference across the slurry curtain cannot be maintained.

If you have any questions, please call Jennifer Reno at (317) 232-3264 or jreno@idem.in.gov.

Sincerely,



Victor P. Windle, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

cc: Mr. Harold Templin
Mr. Michael E. Sickels