

Our ref: 11209506

April 21, 2021

Mr. Rob Marshall  
Indiana Department of Environmental Management  
Office of Land Quality, Permits Branch  
100 North Senate Avenue Room IGCN 1154  
Indianapolis, IN 46204

**Response to IDEM Comments - 2020 Annual Monitoring Report RCRA Corrective Action  
2915 Dr. Martin Luther King Jr. Boulevard Facility  
Anderson, Indiana**

Dear Mr. Marshall

On behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust, GHD Services Inc. (GHD) prepared and submitted the 2020 Annual Monitoring Report Corrective Action (Report) to the Indiana Department of Environmental Management (IDEM) on January 28, 2021. On March 31, 2021 IDEM provided RACER Trust with comments on the Report, a copy of which is included as **Attachment 1**.

On behalf of RACER Trust, GHD has prepared the following response to IDEM's comment on the proposed sampling of the unnamed non-potable water well located off-Site and north of monitoring well MW 88.

### **Comment 1**

**In the report, GHD proposed to sample in 2021 an unnamed non-potable water well located off-site and north of MW 88. The report did not provide adequate specifications for this water well. Within 30 days after receiving this letter, please provide the hydrogeologic unit in which the water well is screened, as well as its name, boring log, and location, in a separate document for IDEM review before sampling the water well. In addition, please propose a sampling schedule.**

### **Response**

The location of the water well (Reference Number 147395) is provided on **Figure 1** and the Indiana Department of Natural Resources' water well record is provided in **Attachment 2**. Based on the water well record, the water well is screened in the bedrock unit. With the increasing vinyl chloride trends observed at MW 88, GHD/ RACER Trust proposed confirming the status and sampling of the water well as a conservative measure. The proposed date for confirming the status and sampling the water well is April 2022, during the next scheduled monitoring event.

Should you have questions regarding the above, please do not hesitate to contact the undersigned.

Regards



**Robert Catallo**  
Engineer

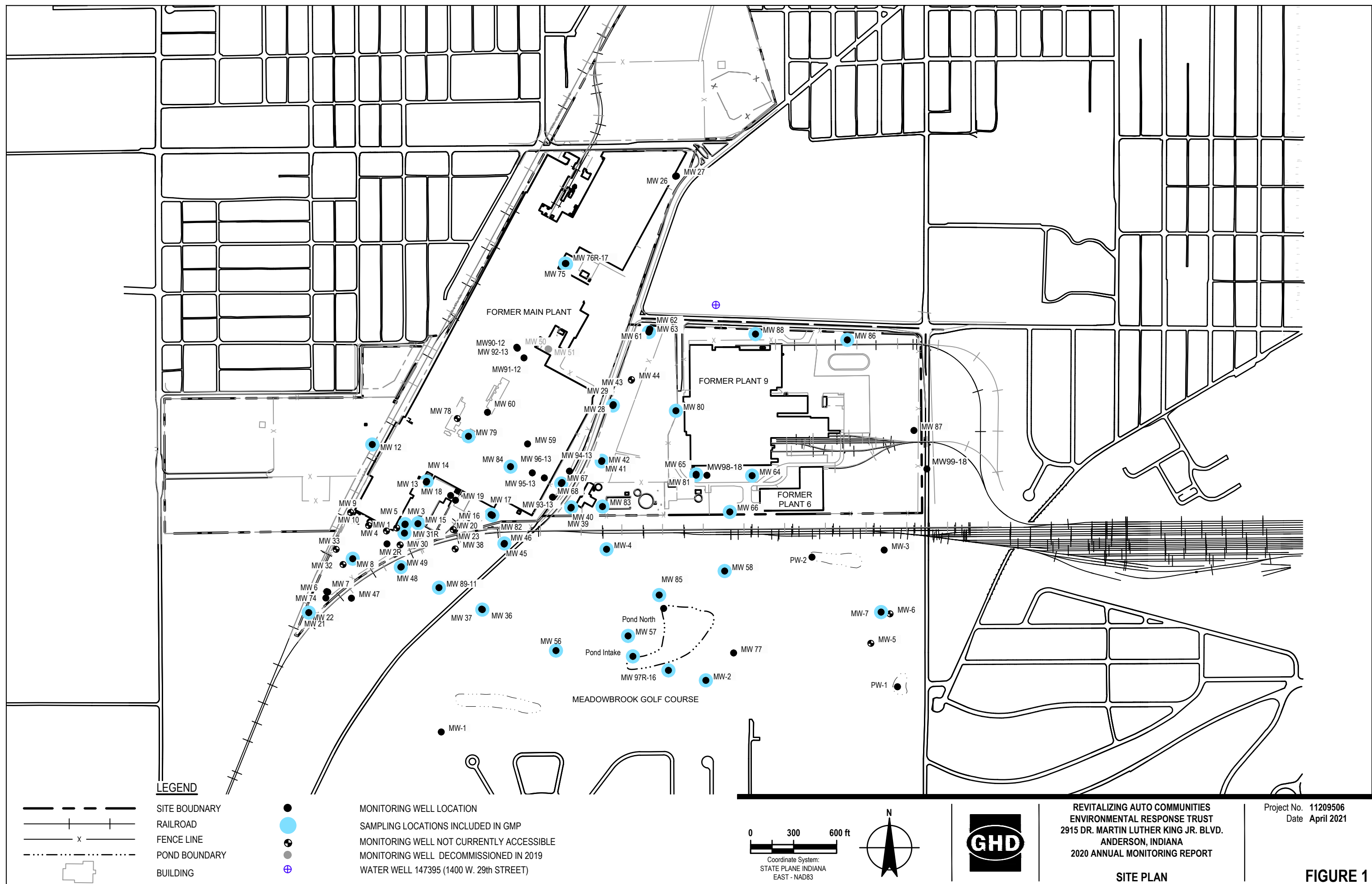
+1 905 346-3838  
robert.catallo@ghd.com

RC/mma/3

Encl.

cc: Robert Hare (RACER Trust)

# Figures



# Attachments

# Attachment 1



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

March 31, 2021

### **VIA EMAIL**

Mr. Robert Hare  
Cleanup Manager  
RACER Trust  
500 Woodward Avenue, Suite 2650  
Detroit, MI 48226

Dear Mr. Hare:

Re: *2020 Annual Monitoring Report RCRA Corrective Action*

Dated January 28, 2021

VFC # 83102922

RACER Trust, MLK Boulevard (Motors  
Liquidation Co.)

Madison County

EPA ID # IND980700801

We received the *2020 Annual Monitoring Report RCRA Corrective Action* (report) dated January 28, 2021, from GHD Services, Inc. (GHD) on behalf of RACER Trust (RACER). The following comments are the result of our review of the groundwater analytical results.

GHD sampled groundwater in November 2020 following the *Site-Wide Groundwater Monitoring Plan* dated October 28, 2010 (VFC # 59127512). In the IDEM letter dated June 10, 2019 (VFC # 82790049), and the GHD response dated August 20, 2019 (VFC # 82828054), IDEM, RACER, and GHD agreed to modify sampling groundwater semiannually to sampling every 18 months. Therefore, the next sampling event will be in April 2022. The report refers to an annual sampling event. Please change the wording to reflect the modification in the sampling frequency in future communications.

Increases in constituents' concentrations affected twelve of the groundwater monitoring wells that the facility sampled: MW 31R screened in hydrogeologic unit 1; MW 16, MW 51, MW 68, and MW 79 screened in hydrogeologic unit 3s; MW 28, MW 57, MW 58, MW 79, MW 80, and MW 88 screened in hydrogeologic unit 3d; and MW 83 screened in bedrock.

GHD noted four recent statistically significant increasing trends: cis-1,2-dichloroethene (cis) at MW 58 and vinyl chloride (VC) at MW 68, MW 79, and MW 80. In addition, MW 16 has a large recent cis increase, and MW 28, MW 51, and MW 57 have a recent increase in cis. Furthermore, MW 16, MW 31R, MW 57, MW 83, and

MW 88 have a recent increase in VC. According to the report, trichloroethene (TCE) has neither statistically significant increasing or decreasing trends but remains at concentrations in the thousands of micrograms per liter in several groundwater monitoring wells. Generally, there is a potential for the presence of TCE dense non-aqueous liquid in the subsurface when dissolved TCE concentration in groundwater reaches the threshold of 1,000 µg/L. Therefore, on-going subsurface release of TCE is likely in several areas.

In the report, GHD proposed to sample in 2021 an unnamed non-potable water well located off-site and north of MW 88. The report did not provide adequate specifications for this water well. Within 30 days after receiving this letter, please provide the hydrogeologic unit in which the water well is screened, as well as its name, boring log, and location, in a separate document for IDEM review before sampling the water well. In addition, please propose a sampling schedule.

Thank you for your continuing efforts. If you have questions, please contact Mr. Thierry Liberge of my staff at [tliberge@idem.IN.gov](mailto:tliberge@idem.IN.gov) or call (317) 232-8712.

Sincerely,

A handwritten signature in dark ink, appearing to read "John A. Guerrettaz". The signature is fluid and cursive, with a large, stylized "G" at the end.

John A. Guerrettaz, LPG  
Chief, Geology Section  
Permits Branch  
Office of Land Quality

cc: Mr. Robert Catallo, GHD  
Ms. Shannon Richardson, GHD  
Madison County Health Department  
Mr. Robert Marshall, Hazardous Waste Permits Section, OLQ, IDEM



# Attachment 2

## Record of Water Well

## Indiana Department of Natural Resources

<b>Reference Number</b> <b>147395</b>	<b>Driving directions to well</b> 29TH ST. ANDERSON, IND.			<b>Date completed</b> Sep 01, 1958
<b>Owner-Contractor</b> Owner Driller	<b>Name</b> LIFE LINE MUFFLER CO.,INC HOBBS AND LLOYD	<b>Address</b>	<b>Telephone</b>	
<b>Construction Details</b> Well  Casing Screen	<b>Use:</b> <b>Depth:</b> 100.0 <b>Length:</b> 83.0 <b>Length:</b>	<b>Drilling method:</b> <b>Pump setting depth:</b> <b>Material:</b> <b>Material:</b>	<b>Pump type:</b> <b>Water quality:</b> <b>Diameter:</b> 4.0 <b>Diameter:</b> Slot size:	
<b>Well Capacity Test</b>	<b>Type of test:</b> <b>Drawdown:</b> ft.	<b>Test rate:</b> gpm for hrs. <b>Static water level:</b> 20.0 ft.	<b>BailTest rate:</b> gpm for hrs. <b>Bailer Drawdown</b> ft.	
<b>Grouting Information</b>	<b>Material:</b> <b>Installation Method:</b>	<b>Depth:</b> from to <b>Number of bags used:</b>		
<b>Well Abandonment</b>	<b>Sealing material:</b> <b>Installation Method:</b>	<b>Depth:</b> from to <b>Number of bags used:</b>		
<b>Administrative</b>	<b>County:</b> MADISON <b>Section:</b> SE of the NW of the NE of Section 23 <b>Grant Number:</b> <b>Field located by:</b> <b>Courthouse location by:</b> <b>Location accepted w/o verification by:</b> <b>Subdivision name:</b> <b>Ft W of EL:</b> <b>Ground elevation:</b> 865.0 <b>UTM Easting:</b>		<b>Township:</b> 19N <b>Range:</b> 7E <b>Topo map:</b> ANDERSON SOUTH  <b>on:</b> <b>on:</b> <b>on:</b> <b>Lot number:</b> <b>Ft E of WL:</b> <b>Bedrock elevation:</b> 780.0 <b>Aquifer elevation:</b> <b>UTM Northing:</b>	

Well Log	Top	Bottom	Formation
	0.0	83.0	BLANK
	83.0	100.0	ROCK
Comments			