January 31, 2024

TRANSMITTED ELECTRONICALLY

Ms. Pamela L. Barnett, PG
Cleanup Manager
RACER Trust
P.O. Box 43859
Detroit, MI 48243

RE: RACER Trust Properties LLC - Elyria Facility
Assessment
Approval
Decision Document
RCRA C - Hazardous Waste
Lorain County
OHD004201091

Subject: Declaration and Decision Document of Corrective Action

Dear Ms. Barnett:

Attached is the final Declaration and Decision Document identifying the remedy for corrective action at the RACER Trust Properties LLC - Elyria Facility (RACER) located at 8315 Murray Ridge Road (former address of 1400 Lowell Street) Elyria, Lorain County, Ohio. Staff at the Ohio EPA, Division of Environmental Response and Revitalization (DERR) issued a Statement of Basis seeking public input on the proposed remedy on May 1, 2023. Ohio EPA did not receive any comments on the proposed remedy.

Since the proposed remedy appears to comply with applicable hazardous waste rules the Declaration and Decision Document represents the selected remedy for RACER's corrective action in accordance with the policies of Ohio EPA and the statues and regulations of the State of Ohio.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Section 3745.014 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission **within thirty (30) days** after notice of the director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Treasurer, State of Ohio" which the Commission, in its discretion, may reduce if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director **within three (3) days** of the filing with the Commission.

Ohio EPA requests that a copy of the appeal be served upon the Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Commission at the following address:

Environmental Review and Appeals Commission
30 East Broad Street, 4th Floor
Columbus, OH 43215

This letter is an official response from Ohio EPA that will be maintained as a public record. If you have any questions regarding this letter, please contact Marissa Tomin at (330) 963-1232 or by email at Marissa.Tomin@epa.ohio.gov.

Sincerely,

Natalie Oryshkewych

Natalie Oryshkewych
Manager
Division of Environmental Response and Revitalization

NO/cm

Attachments

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DECLARATION

SITE NAME AND LOCATION

RACER Trust Properties LLC - Elyria
8315 Murray Ridge Road
(Former address of 1400 Lowell Street)
Elyria, Lorain County, Ohio
OHD004201091

PURPOSE

This Decision Document presents the selected remedial action for the RACER Trust Properties LLC – Elyria Facility in Elyria, Lorain County, Ohio, chosen in accordance with the policies of the Ohio Environmental Protection Agency (Ohio EPA), statutes and regulations of the State of Ohio, and the Ohio Corrective Action Plan.

ASSESSMENT OF THE SITE

The RACER Site was once a portion of the General Motors (GM) Fisher Guide Automotive Parts Plant, which closed in 1988. The GM plant participated in Ohio EPA's Voluntary Action Program and received a covenant not to sue in 2021. The remaining portion of the former GM facility, owned by Revitalizing Auto Communities Environmental Response (RACER) Trust, has participated in corrective action activities on a voluntary basis, as documented in correspondence between Ohio EPA and REALM Landfill/GM Elyria dated August 24, 2006 (Ohio EPA, 2006).

DESCRIPTION OF THE SELECTED REMEDY

The selected remedies include:

1. Recording of an Amended Environmental Covenant restricting land use to industrial uses, restricting groundwater extraction and use, limiting building occupancy without a remedy or demonstration that facility complies with vapor intrusion standards, limiting excavation activities without a Risk Mitigation Plan, and prohibiting interference with the post-closure landfill unit without prior written approval from Ohio EPA.
2. the implementation of a groundwater monitoring plan,
3. continued implementation of the approved amended April 2021 post closure care plan for the hazardous waste landfill, which will have all provisions converted to Directors Final Findings and Orders to administer long-term obligations,

4. management in place of contaminated soils,
5. removal of polychlorinated biphenyl (PCB) contaminated soils (completed in April 2023),
6. inspection and removal of surficial asbestos containing material (ACM) under a Risk Mitigation Plan, and
7. placement of supplemental soil on the Historically Covered Settling Basin so that soil cover over waste residuals equals six inches total cover.

STATUTORY DETERMINATIONS

The selected remedial action is protective of human health and the environment, is in accordance with applicable State and federal laws, is responsive to public participation and input, and is cost-effective. The remedy utilizes permanent solutions to the maximum extent practicable to reduce toxicity, mobility, and volume of hazardous substances at the Site. The effectiveness of the remedy will be reviewed regularly.

9/26/2023

Director Anne M. Vogel Date

RCRA DECISION DOCUMENT

RACER Trust Properties LLC - Elyria

U.S. EPA ID# OHD004201091

8315 Murray Ridge Road

Elyria, Lorain County, Ohio 44035

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Abbreviations

ACM	Asbestos containing material
AOC	Area of Concern
CA	Corrective Action
CE	Construction/Excavation
CI	Commercial/Industrial
CMS	Corrective Measures Study
COCs	Contaminants of Concern
COPECs	Contaminants of Potential Ecological Concern
ERA	Ecological Risk Assessment
GM	General Motors
HHRA	Human Health Risk Assessment
MCL	Maximum Contaminant Level
NCP	National Contingency Plan
Ohio EPA	Ohio Environmental Protection Agency
OMZA	Outside Mixing Zone Average
PCBs	Polychlorinated biphenyls
PFAS	Polyfluorinated alkyl substances
RACER	Revitalizing Auto Communities Environmental Response
RCRA	Resource Conservation and Recovery Act
REALM	Remediation and Liability Management Company, Inc.
RFI	RCRA Facility Investigation
RO/RG	Remediation Objectives/Remediation Goals
RSLs	Regional Screening Levels
SOB	Statement of Basis
THQ	Target Hazard Quotient
TR	Target Risk
TSD	Treatment, storage, and disposal
U.S. EPA	United States Environmental Protection Agency
UCL	Upper Confidence Limit
VI	Vapor Intrusion
VOCs	Volatile organic compounds
WWTP	Wastewater treatment plant

DECISION DOCUMENT

RACER Trust Properties LLC – Elyria

Elyria, Ohio

U.S. EPA #OHD004201091

Prepared by:

The Ohio Environmental Protection Agency

August 2023

Announcement of Decision Document

Ohio EPA is issuing this Decision Document to identify the selected corrective measures for addressing contamination at the RACER - Elyria facility and provide the rationale for their selection. Ohio EPA is issuing this Decision Document in a manner consistent with the terms of the existing post-closure care requirements.

ERAC Appeal Period: As a final action of the Director of Ohio EPA, the Decision Document may be appealed to the Environmental Review Appeals Commission (ERAC) pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with ERAC (77 South High Street, 17th Floor, Columbus, OH 43215) within thirty (30) days after notice of the Director's action.

Additional Information: Additional information is available on Ohio EPA's website. The Decision Document and other relevant documents available electronically via Ohio EPA's eDocument portal at http://edocpub.epa.ohio.gov/publicportal/edochome.aspx. To use the search function on the eDocument portal, search under the document type of "Remediation Response" and then refine the search using the RACER Elyria facility's RCRA ID number (Secondary ID), which is OHD004201091. Links to relevant documents are also provided in the reference section of this document. For questions, please contact Marissa Tomin at *Marissa.Tomin@epa.ohio.gov* or 330-963-1232.

1.0 Introduction

Ohio Environmental Protection Agency (Ohio EPA) has prepared this Decision Document for the remediation of the Revitalizing Auto Communities Environmental Response Trust Properties LLC – Elyria (RACER Site), located at 8315 Murray Ridge Road, (formerly assigned the address of 1400 Lowell Street) Elyria, Ohio (Figure 1). This Decision Document identifies Ohio EPA's selected remedies and explains the reasons for the selection of the remedies.

Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) activities were required after the closure of the former General Motors (GM) Corporation's Fisher Guide automotive parts plant property in July 1988. In June 2011, 95.225 acres representing the eastern portion of the original GM plant property transferred from a subsidiary, the Remediation and Liability Management Company Inc. (REALM), to the RACER Trust.

RACER Trust completed a RCRA Facility Investigation (RFI) that concluded that current Site conditions posed unacceptable risks to human health and evaluation of corrective measure alternatives were necessary.

This Decision Document is based on the RFI and supplemental RFI reports completed by Conestoga-Rovers & Associates in 2016 and by Haley and Aldrich in 2021 on behalf of RACER Trust. The selected remedies include the excavation of PCB contaminated soils on a portion of the property, which was completed in April 2023; an amended environmental covenant (EC) restricting land use to industrial uses, prohibiting potable use of ground water, and requiring vapor intrusion evaluation and/or use of an engineering control prior to occupancy of future buildings; implementation of a ground water monitoring plan; a Risk Mitigation Plan; the placement of supplemental soil on the Historically Covered Settling Basin and rolling the post-closure care obligations of the existing hazardous waste landfill required under an Ohio EPA approved Post-Closure Care Plan, dated 2021, into site-wide corrective action. These selected corrective measures reduce future maintenance activities, and control, minimize, or eliminate exposure to contamination, to the extent necessary to protect human health and the environment.

Ohio EPA and RACER will enter into Director's Final Findings and Orders (DFFOs) to implement the selected remedies.

The requirements of the DFFOs will combine the existing post-closure care requirements for the onsite landfill into Corrective Action. The existing landfill Post-Closure Care Plan requires periodic inspection, ground water monitoring, and routine maintenance of the closed landfill.

Finally, financial assurance for the newly identified controls will be established and maintained as part of the DFFOs in accordance with the GM Bankruptcy Consent Order dated March 3, 2011.

2.0 Facility Background

2.1 Facility History

The 95.225 acres that make up the RACER Site were originally part of the former GM Fisher Guide Division plant located at 8315 Murray Ridge Road in the City of Elyria. The plant operated for about 35 years (Figure 2). Early activities at the former GM facility produced wheel covers, bumper guards, auto grills, hood hinges, die cast parts, foam instrument panels, and jet engine turbine blades. Beginning in 1984, manufactured products included seat cushions, metal seat frames and hinges, sunroof assemblies, and automotive trim. The plant used an electroplating process to manufacture many of the auto facility's products (Ecology and Environment, 1991). Wastewater generated from the facility's electroplating lines, which consisted of acid/alkali or metal bearing wastewater, chromic acid bearing wastewater, cyanide-based wastes and rinses, and cleaner pre-soaked based wastes, were treated at an onsite wastewater treatment plant (WWTP). The WWTP neutralized processed waste, which was then placed with treatment sludges into three surface impoundments on the Site now held by RACER Trust. Most of the electroplating operations at the facility were discontinued by July 31, 1984. After August 1986, the Fisher Guide Division of GM adopted processes that discontinued the placement of facility process sludges into the impoundments (Ecology and Environment, 1991; Fisher Guide, 1988). All production at the former GM facility ceased in July 1988 with the closure of the plant (Fisher Guide Division General Motors Corporation, 1988).

From July 1987 through July 1988, before selling the former manufacturing plant parcel to Northern Ohio Limited Partnership, GM implemented closure activities. Sludges dewatered at the facility's WWTP's plate filter press were disposed of offsite at an appropriately licensed disposal facility (Weston Services Inc., 1988), and the WWTP was decontaminated (Ecology and Environment, 1991). The facility closure activities ensured that all the facility's hazardous

waste treatment, storage, and disposal (TSD) units were closed in accordance with plans and specifications approved by Ohio EPA and/or the U.S. EPA (Fisher Guide Division General Motors Corporation, 1988). In August 1987, Ohio EPA conditionally approved a hazardous waste closure plan for the closure of the three surface impoundments located south of the GM plant. The Closure Certification Report (Weston Services Inc., 1988) for the surface impoundments, landfill, and hazardous waste units were submitted to Ohio EPA on September 16, 1988, and approved on January 20, 1993. The landfill is inspected bi-monthly and maintained as required by the Amendment to the Post-Closure Plan for RACER Elyria dated February 22, 2021 (Haley & Aldrich, 2021b).

The 2016 RCRA Facility Investigation (RFI) Report presented nine areas of concern (AOCs) that had been identified in the Site Summary Report (Conestoga-Rovers & Associates, 2007). AOCs are summarized in Table 1 and shown in Figure 3. Sitewide ground water represents the ninth AOC, not depicted in the figure.

Table 1: Area of Concern (AOC) Summary

AOC	Name	Description
AOC-1	Open Burn Area	Area used for open burning and placement of facility trash from 1947 to 1974.
AOC-2	Northern Sludge Area	Area used for placement of approximately 25,000 cubic yards of WWTP sludges from 1956 to 1967. This area was historically covered after cessation of use.
AOC-3	Southern Sludge Area	Area used for placement of approximately 40,000 cubic yards of WWTP sludges from 1972 to 1977.
AOC-4	Northern Trenches Area	Names refer to investigative test trenches excavated in 1988: 1. Northern Trenches Area: Four trenches were excavated to the northeast of the Open Burn Area and north of the Former Fuel Oil Tank. Two trenches were found to have fill material. 2. Southern Trenches Area: Four trenches were excavated to the south of the former Fuel Oil Tank. Each trench had fill material.
AOC-5	Southern Trenches Area	

AOC-6	Northern Die Storage Pad Area	Two concrete pads formerly used to store manufacturing dies. Cleaning activities, reportedly using various solvents, occurred on the pads.
AOC-7	Southern Die Storage Pad Area	
AOC-8	Former Fuel Oil Tank Area	Former 2,310,000-gallon fuel oil tank and the earth dyke that surrounded the tank.
AOC-9	Sitewide Ground Water	

2.2 Environmental Setting

2.2.1 Topography

Lorain County is located on the eastern fringe of the till plain of the Great Central Lowlands. The topography in the vicinity of the Site is relatively flat to gently rolling (Conestoga-Rovers & Associates, 2016). The Site has both open spaces and woods and includes a maintained clearing around the Closed Landfill Area for access.

2.2.2 Climate

Lorain County experiences a continental climate with strong modifying influences due to the presence of Lake Erie. Summers are moderately warm and humid. Winters are cold and cloudy with the average temperatures falling below freezing in December, January, and February. Consistent with a continental climate, precipitation can vary widely; however, it is normally abundant and well distributed over the year. The most frequent precipitation is in May through September, and winter is the driest season (Conestoga-Rovers & Associates, 2016).

2.2.3 Soils

Lorain County was formed by the Late Wisconsin Glacier. Lorain County has two physiographic areas: the northern third of the county, where the RACER Site is located, is a lake plain, and the southern two-thirds is a till plain. The lake plain consists of relatively level expanses with occasional sand ridges, high areas underlain by sandstone or shale bedrock, and breaks along rivers and streams. The Lorain series consists of very deep, very poorly drained clay-rich soils. Elyria sits on these glaciated, lake deposits and beach ridges that formed in Wisconsin age fine

textured glaciolacustrine sediments. This soil formed in depressions on lake plains, terraces and till plains. Permeability is moderately slow in the surface soil and very slow in the subsoil and substratum (Lorain Soil and Water Conservation District, 2022; U.S. Department of Agriculture, 2022).

The following soil series are mapped on the Site:

- Bogart loam (2 to 6 percent slopes, moderately well drained, unknown hydric),
- Fitchville silt loam (0 to 2 percent slopes, somewhat poorly drained, partially hydric),
- Haskins loam (0 to 2 percent slopes, somewhat poorly drained, partially hydric),
- Haskins-Urban land complex (nearly level, somewhat poorly drained, partially hydric),
- Luray silty clay loam (very poorly drained, hydric),
- Mermill loam (very poorly drained, partially hydric), and
- Miner silty clay loam (very poorly drained, partially hydric).

The northern half of the Site is mapped as Haskins-Urban land complex. The majority of the southern half of the Site is mapped as Luray silty clay loam. Bogart loam, Haskins loam, Mermill loam, and Miner silty clay loam are mapped in the western portion of the southern half of the Site. With the exception of Luray silty clay loam, which is listed as hydric, and Bogart loam, which is listed as unknown hydric, the remainder of the soil series mapped on the Site are listed as partially hydric. Soils classified as partially hydric may contain inclusions of other soil series that are listed as hydric and are typically located within depressions (Conestoga-Rovers & Associates, 2016).

2.2.4 Site Geology, Ground Water, and Water Supply

The bedrock underlying Lorain County consists of relatively flat-lying sedimentary strata which include the upper Devonian and lower Mississippian Cleveland Shale, Bedford Shale, Berea Sandstone, and Cuyahoga Shale. Bedrock dips slightly to the county's south or southeast. The primary bedrock aquifer in Lorain County is the Berea Sandstone, which typically yields 3 to 10 gallons per minute (Barber, 1988).

There are three main stratigraphic units at the Site. From the surface downwards, the units consist of drift (clay till), Berea Sandstone, and Bedford Shale. The two water bearing zones are the till unit and the contact with the Berea Sandstone (referred to as the Till Contact unit) and the upper portion of the Berea Sandstone aquifer (referred to as the Bedrock unit). Near the

closed landfill, ground water flows generally to the northeast beneath the landfill and southern portion of the Site. In the northern portion of the Site, ground water flow is influenced by existing storm sewers. The storm sewers appear to prevent off-site migration of ground water and act similar to a gaining stream (Conestoga-Rovers & Associates, 2016).

The closest well is approximately 0.6 miles northwest and upgradient of the Site on the Northern Ohio Industrial Park property. A review of file records and a call with the facility confirmed that this well is not being used as a potable water supply. Areas within the City of Elyria, including the Site, have access to the public water supply.

There is no known ground water discharge to surface water in the immediate vicinity of the Site. Precipitation that falls near the landfill is diverted from the capped landfill via riprap swales to adjacent drainage ditches. Intermittent flow has been observed in the Site drainage ditches after precipitation events. The surface water flows off the Site via sewers and drainage ditches.

Occasionally, surface water has inundated low areas on the property. A Wetland Delineation Report completed in June 2014 identified thirteen wetland areas at the Site, 10 jurisdictional wetlands (41.09 acres) and 3 were isolated wetlands (2.32 acres) (Cardno ATC, 2014). The closest major water body is the West Branch of the Black Creek which is more than 0.8 mile to the east of the Site.

2.2.5 Current Conditions

The Site consists of an open grass area with irregular topography ringed by scattered wetlands and woods. The Site is bounded to the west by the former GM Inland Fisher Guide Division Plant, which is currently used for commercial/industrial purposes by Northern Ohio Associates Limited Partnership. Industrial and agricultural properties lie to the south, southwest, and east. A railway separates the Site from additional commercial and industrial properties north of the Site. A network of utilities is found below-ground in the center of the property. There are currently no buildings on the Site.

3.0 Interim Corrective Measure

During vegetation clearing in March 2019 to prepare for the asbestos survey, workers observed a ten by 15-feet debris pile. The debris included remnants of two or three drums along with other unknown materials. On September 19, 2019, RACER removed this material until encountering native soil and collected a composite soil sample for laboratory analysis. Results of the analysis demonstrated elevated concentrations of chromium. Additional analyses were conducted in February 2020. Based on the data collected to date, the material from the former debris pile has not impacted the soils greater than risk-based standards (Ohio EPA, 2020).

4.0 Summary of RCRA Facility Investigations

The CA process for facilities regulated under RCRA includes:

- *RCRA FACILITY ASSESSMENT (RFA)* - Updated or conducted by Ohio EPA. It answers the questions: Is there a current release and/or imminent threat?

- *INTERIM MEASURE(S)* - Undertaken by the facility, it addresses in the near term a release or potential release and/or an imminent threat or potential imminent threat.

- *RCRA FACILITY INVESTIGATION (RFI)* - Undertaken by the facility. It answers the questions: How significant is the release or potential release and/or imminent threat or potential imminent threat?

- *CORRECTIVE MEASURE(S) STUDY (CMS) AND DECISION* - Shared responsibility by both the facility and Ohio EPA. It determines how to best address the release or potential release and/or imminent threat or potential imminent threat.

- Statement of Basis - A Statement of Basis is a formal document written and issued by the regulating agency which proposes final remedies and seeks public comments.

- Decision Document- After considering all comments received during the Public Comment period for the Statement of Basis, if any, Ohio EPA issues a Decision Document. This document is the Decision Document for the RACER Site. A Decision Document is a formal document written and issued by the regulating agency which declares the final remedy and documents any public comments.

- *CORRECTIVE MEASURE(S) IMPLEMENTATION (CMI)* - Performed by the facility, it designs the solution and addresses the release or potential release and/or imminent threat or potential imminent threat.

Characterization of environmental conditions of the RACER Site began after the closure of the GM plant, beginning with a Preliminary Assessment in 1984 and Screening Site Inspection in 1991 (Ecology and Environment, 1991). Since acquiring the Site, RACER Trust has participated in corrective action activities on a voluntary basis, as documented in correspondence between Ohio EPA and REALM Landfill/GM Elyria dated August 24, 2006 (Ohio EPA, 2006). In 2016, a follow-up RFI identified areas where waste was disposed that needed further investigation and noted the following Contaminants of Concern (COCs): volatile organic compounds (VOCs), chlorinated solvents, metals (principally antimony, arsenic, hexavalent chromium, cobalt, copper, manganese, nickel, zinc) and polyaromatic hydrocarbons (mainly benzo(a)pyrene). A supplemental RFI took place in 2021 to further characterize areas of the Site where the following COCs were noted: 1,4-dioxane, per and polyfluorinated alkyl substances (PFAS), PCBs, and ACM. Between 1984 and 2022, REALM and RACER Trust undertook several environmental investigations to characterize the extent of contamination at the Site. These investigations are listed below:

- Preliminary Assessment, 1984
- Phase II-C Environmental Assessment,1988
- Screening Site Inspection, 1991
- Northern Burn, Southern Sludge, Northern Sludge area investigations, 2000
- Ground water investigations, 2000-2014
- 1,4-Dioxane investigation, 2009
- Initial RFI, 2011
- Additional Sampling and Analysis Plan investigation, 2013
- Volatile Organic Compounds evaluation of the Northern and Southern Die Storage Pad areas, 2016
- Pre-design investigation of northern portions, 2017-2022. The pre-design evaluation included multiple smaller investigations that occurred between 2017 – 2022. Investigations focused on a surface fill evaluation of black organic and blue sludge material and suspected ACM (2017), a debris pile found in 2019, an extensive ACM survey (2019), a supplemental VOC investigation (2017), PCB investigations (2017-2018, 2022), and a PFAS investigation (2020).

4.1 Ecological Risk Assessment

A site visit and scoping Level I Ecological Risk Assessment (ERA) was conducted by Conestoga-Rovers & Associates (2016) which indicated:

- The presence of sensitive ecological receptors (wetlands and associated biota and flora),
- The presence of contaminants of potential ecological concern (COPECs) in soil and potential releases to sediment,
- The close proximity of the Southern and Northern Sludge Areas to wetlands which constituted circumstantial evidence that exposure pathways are complete, and
- There is uncertainty regarding whether there were complete exposure pathways to the sensitive ecological receptors on the Site.
- The Level I ERA provided a qualitative assessment that demonstrated no further action was warranted based on the lack of impact to wetlands at the Site and limited resources to carry out a Level II ERA or conduct remediation at areas where there is evidence of releases.

4.2 Human Health Risk Assessment

Risks associated with exposure to COCs were evaluated for exposure pathways determined to be complete. The following complete exposure pathways were identified and evaluated:

- Soil direct contact (ingestion, dermal contact, and inhalation of volatiles and particulates) for commercial/industrial (CI) workers, construction excavation (CE)/utility workers, and adolescent trespassers.
- Surface water direct contact by CI and CE workers.

The following pathways are considered complete and pose unacceptable risks which will be addressed through the corrective measures:

- Soil direct contact (ingestion, dermal contact, and inhalation of particulates) to residential on-Site receptors.
- Soil direct contact (ingestion, dermal contact, and inhalation of particulates) to CE workers.
- Ground water ingestion for Site CI and CE workers.
- Inhalation of toxic VOCs by way of vapor intrusion (VI) from contaminated soil and ground water to future CI and CE workers.

- Direct contact (ingestion, dermal contact, and inhalation of fibers) with ACM to future CI and CE workers.

The following pathways are considered incomplete either due to current site conditions (lack of occupiable structures) or by elimination following a nature and extent determination:

- Inhalation of toxic volatiles by contaminated soil and ground water through the VI pathway to current CI and CE workers.
- Ground water ingestion by off-Site residential and CI receptors.
- Surface water and sediment direct contact by human receptors.

4.3 Corrective Measures Objectives

Based on the conclusions of the human health risk assessment (HHRA) and the other identified conditions, the following remediation objectives (RO) were identified for the RCRA Corrective Action:

1. Prevent residential and commercial use of the Site.
2. Prevent construction of habitable structures without appropriate vapor intrusion (VI) evaluations.
3. Prevent unacceptable exposure to ground water.
4. Prevent potential CI worker exposures to subsurface soil greater than acceptable risk thresholds in the Southern Trenches Area (AOC-3), and Southern Die Storage Pad Area (AOC-7) and prevent potential CE worker exposures to subsurface soil greater than acceptable risk thresholds in all AOCs except for Open Burn Area (AOC-1).
5. Maintain the closed Landfill area consistent with the requirements outlined in the approved amended Post Closure Care Plan (Haley & Aldrich, 2021b).
6. Prevent potential exposures to surface soil with concentrations greater than acceptable risk thresholds in Northern Sludge Area (AOC-2), Southern Trenches Area (AOC-5), Northern Die Storage Pad Area (AOC-6), and Southern Die Storage Pad Area (AOC-7).

In addition, the following additional remediation goals (RG) beyond the RCRA Corrective Action are identified at the Site:

1. Prevent exposure to friable asbestos.
2. Maintain cover over the Historically Covered Settling Basin to prevent exposure to contaminants and waste.

The responses to meet these objectives for the Site are summarized below, along with an indication of how the objectives will be addressed:

Table 2: Corrective Measure and non-RFI Responses

RO	Corrective Measure or Remedial Response	Addressed by
1	Restrict future land use to industrial uses only.	Baseline Institutional Controls (Environmental Covenant)
2	Require a VI evaluation prior to construction of future buildings on Site.	
3	Prohibit ground water extraction except for investigation, monitoring, or remediation of ground water and prohibit potable use of ground water	
3	Monitor AOC-9 (Sitewide ground water; concurrent with landfill monitoring).	Ground Water Monitoring Plan[1]
4	Manage exposure to soil deeper than 2 feet bgs.	Risk Mitigation Plan[1]
5	Continue operation and maintenance for the closed RCRA landfill.	Post-Closure Care Document [1]
6	Manage potential exposures to concentrations of cyanide, thallium, antimony, nickel, and trichloroethylene in surface soil at AOC-2 (Northern Sludge Area), AOC-6 (Northern Die Storage Pad Area), and AOC-7 (Southern Die Storage Pad Area) greater than risk thresholds.	Manage in place as part of a Risk Mitigation Plan.[2]
7	Address elevated concentrations of PCBs in soil at AOC-5 (Southern Trenches Area).	Excavate PCBs in soil in the Southern Trenches area (AOC-5)[2]

[1] Administratively implemented under Directors Final Findings and Orders following issuance of Decision Document

[2] Administratively implemented under Directors Final Findings and Orders following issuance of Decision Document

RO	Corrective Measure or Remedial Response	Addressed by
RG	**Response**	**Addressed by**
1	Manage ACM	Remove surficial ACM, as needed, during the annual inspection. Periodically monitor area for exposed ACM and manage subsurface work in this area through the Risk Mitigation Plan.[2]
2	Address areas of Historically Covered Settling Basin (in and near AOC-2) where cover material is less than 6 inches thick.	Placement of supplemental soil where existing cover thickness is less than six inches thick over settling residuals to equal at least six inches total cover.

5.0 Evaluation and Summary of Selected Remedy

Ohio EPA's selected remedies for the RACER Site are a combination of an interim corrective measure, soil removal, ground water monitoring, and institutional controls.

5.1 Corrective Measures Evaluation Criteria and Summary of Remedy

The selected remedy was evaluated considering the RCRA threshold criteria, which include:

1. Protection of human health and the environment – does the proposed remedy protect humans and the natural environment?
2. Attainment of clean up objectives – can the proposed remedy effectively meet clean up goals and objectives stated above?
3. Controlling the source(s) – does the proposed remedy stop further environmental degradation by controlling or eliminating further releases that may pose a threat to human health and the environment?
4. Comply with applicable standards for management of waste – has the property owner discussed how the specific waste management activities will be conducted in compliance with all applicable state or federal regulations?

The remedy was then compared to the RCRA balancing criteria which include the following:

1. Long-term Effectiveness – Is there a demonstration of reliability of the remedy that will result in a reasonable useful life of the remedy?
2. Reduction in the Toxicity, Mobility or Volume of Wastes – Will the remedy employ techniques capable of eliminating or substantially reducing the inherent potential for the wastes in waste management units (and/or contaminated media at the facility) to cause future environmental releases or other risks to human health and the environment?
3. Short-term Effectiveness – Will remedial activities pose high risks to workers or to the environment that require special protective measures?
4. Implementability– Does the remedy consider factors such as time, technologies, necessary administrative steps, and disposal?
5. Costs – What does the remedy cost compared to other options/technologies? Consider costs such as those for: engineering, site preparation, construction, materials, labor, sampling/analysis, waste management/disposal, permitting, health and safety measures, training, operation, and maintenance.

Community acceptance was also a balancing criterion considered after the public comment period. Based on the conclusions drawn from the RFI and evaluation of the proposed alternative remedies, Ohio EPA selected the corrective action remedy for the Site as summarized below:

1. Implement baseline institutional controls pertaining to land use and use of ground water. Such controls will include restrictions that will maintain industrial use of the Site and will prohibit any future use of ground water at the Site for any purpose, beyond dewatering for construction/infrastructure, sampling, or other remediation activity, and will ensure that future on-Site ground water and land uses remain consistent with the conclusions of the HHRA and CMS. An environmental covenant dated May 7, 2020, currently restricts land use to Commercial/Industrial uses. Because the environmental covenant was issued for the purpose of obtaining a covenant not to sue for the adjacent former GM property and predated the HHRA updated in 2022, the environmental covenant for the Site will need to be revised to limit activities to industrial use only.
2. Implement a Ground Water Monitoring Plan.
3. Continue Post-Closure Care of the existing closed RCRA landfill under an Ohio EPA approved Post-Closure Care Plan which will have all provisions converted to Directors Final Findings and Orders to administer long-term obligations.

4. Manage in place elevated sample concentrations of cyanide, thallium, antimony, nickel, or trichloroethene in AOC-2, AOC-6, and AOC-7. Rely on the findings of the target organ segregation evaluation and a Risk Mitigation Plan to effectively manage these areas.
5. Excavate PCBs in soil in the Southern Trenches area (AOC-5). Excavate soil with concentrations of PCBs equal to or greater than 9.7 milligrams per kilogram (mg/kg) at AOC-5 (Southern Trenches Area) and backfill to existing grade (completed in April 2023).

The following additional remedial actions for other areas at the Site have been selected:

1. ACM - Remove surficial ACM, as needed, during the annual inspection as described in the approved Risk Mitigation Plan. Periodically monitor area for exposed ACM and manage subsurface work in this area through the Risk Mitigation Plan.
2. Historically Covered Settling Basin (AOC-2, also identified as the Northern Sludge Area) - Placement of supplemental soil where existing cover thickness is less than six inches thick over settling residuals to equal at least six inches total cover. Work will be completed using an approved work plan.

5.2 Institutional Controls, Site Management, And Risk Mitigation

Institutional controls are non-engineered instruments such as administrative and legal controls that help minimize the potential for human exposure to contamination and protect the integrity of the remedy (United States Environmental Protection Agency, *Superfund: Institutional Controls, 2022)*. On May 7, 2020, an environmental covenant was recorded with Lorain County establishing restrictions on future use of ground water and land uses at the Site to ensure protection of human health and the environment. At that time, the environmental covenant served the purpose of assisting the property to the west (the former GM plant) with obtaining a covenant not to sue through the Voluntary Action Program from Ohio EPA. The area subject to the environmental covenant is the perimeter boundary of the Site, shown in Figure 5. The environmental covenant restricts the Site to commercial or industrial land use only. The extraction of ground water at or underlying the Site for any purpose other than for investigation, monitoring or remediation is prohibited. Furthermore, installation of potable wells is not allowed, and Ohio EPA must be notified of any excavation activities occurring below the upper two (2) feet of the ground surface. Any structures must comply with applicable standards for the VI to indoor air exposure pathway. The environmental covenant will be revised upon completion of remedial activities at the RACER Site to restrict use to industrial land use based on the CMS and this Decision Document.

A Ground Water Monitoring Plan will follow the approved Ground Water Monitoring Plan contained in the Corrective Measures Study (2022) which includes collecting water level measurements once annually in the spring when vegetation is sparce and provides a summary and conclusions of the ground water monitoring event after the gauging is completed. In addition, ground water monitoring associated with post-closure activities for the landfill will be completed every even year.

The requirements of the amended Post-Closure Care Plan (Haley & Aldrich, Inc., 2021b) approved in April 2021 describing the operation, maintenance, and ground water monitoring requirements for continued care of the landfill will be maintained in the DFFOs.

A Risk Mitigation Plan will be implemented to describe the procedures required to ensure CE worker safety during soil disturbance activities including annual and periodic inspections.

Additional controls beyond the Baseline Institutional Controls are discussed in the following sections. The selected remedies protect human health and the environment and attain cleanup objectives based on the conclusions of the target organ evaluation in the CMS.

5.3 Evaluation of Selected Remedy

Ohio EPA used the criteria described in Section 5.1 to identify the selected remedies. Threshold and balancing criteria were considered to ensure protectiveness to human and ecological receptors in the RFI areas of AOC-2, AOC-6, and AOC-7 – Northern Sludge Area, Northern Die Storage Pad Area, and Southern Die Storage Pad Area; and in AOC-5-Southern Trenches PCBs. The following text outlines Ohio EPA's rationale for the selected remedies.

5.3.1 Sitewide institutional controls, monitoring, and exposure prevention

Placing a sitewide environmental covenant restricting use to industrial activities only and preventing the extraction of ground water for potable uses meets the first evaluation criteria of protection of human health and the environment. Specific details of the institutional control requirements are provided in Section 5.2.

1. Protection of Human Health and the Environment

The remedy is considered protective of human health and the environment when implemented along with institutional controls. Furthermore, the findings of the HHRA and the target organ

evaluation noted that risk from exposure to COCs in soil is less than the risk and hazard thresholds for industrial use. Therefore, managing waste residuals in place, with the implementation of institutional or administrative controls restricting future direct contact by residential receptors and commercial workers and limiting potential unacceptable exposures to industrial and CE receptors, will be protective of human health and the environment.

2. Attainment of Media Cleanup Objectives

The remedy will not remove contaminated media but will rely on the findings of a target organ segregation evaluation that demonstrates protectiveness of human health and the environment.

3. Controlling the Sources of Releases

Residual sources are controlled through the selected manage in place remedy. Baseline institutional controls, including the Risk Mitigation Plan will also be protective of CE workers. As discussed in the RFI documents, the sources of releases to soil and ground water at the Site are believed to be historical and to have been controlled. Therefore, further source control beyond the institutional controls, Risk Mitigation Plan, and management in place is not necessary.

4. Applicable Standards for Management of Waste

The selected remedy will comply with regulatory waste management standards set forth in the Ohio Revised Code Chapter 3734 and Ohio Administrative Code Chapters 3745-50 through 57, 65 through 69, 205, 256, 266, 270, 273 and 279, and RCRA. Compliance with standards for management of wastes is met by compliance with all applicable federal, state, and local regulations during corrective measures implementation to ensure that the waste is managed in a protective manner.

5. Long Term Reliability and Effectiveness

The selected remedy provides corrective actions that, coupled with baseline institutional controls, are expected to be effective and dependable. The completed hot spot removal resulted in the excavation and off-site disposal of the material, providing more certainty in the

long-term reliability and effectiveness at the Site. Hot spot removals, along with the baseline institutional controls at the Site, effectively manage constituents in place, as demonstrated by the target organ evaluation found in the CMS.

6. Reduction of Toxicity, Mobility or Volume of Wastes

The HHRA and target organ evaluation have demonstrated protectiveness of the selected remedy for human health and the environment.

7. Short-Term Effectiveness

Because there are no current unacceptable exposures, the manage-in-place remedy is considered immediately effective.

8. Implementation

The selected remedy will be implemented with moderate engineering and administrative procedures. Because baseline institutional controls are required, the administrative requirements of implementing the remedy are considered inconsequential.

9. Costs

The costs of the selected remedy will not have significant impacts beyond those already required under the baseline institutional controls. The manage-in-place remedy was selected in part due to relatively modest long-term funding costs related to maintenance of the closed landfill.

5.3.2 AOC-5 Southern Trenches Area PCBs

In April 2023, a total of 1,212.24 tons of PCB impacted soils with concentrations equal to or greater than 9.7 mg/kg were excavated to a minimum of two feet below ground surface. The soil was sent off-site for disposal at Republic's Lorain County Landfill facility. After excavation, a geotextile demarcation fabric and 1,188 tons of clean general fill was placed within the limits of excavation. Removal of soil with PCB concentrations was immediately effective upon implementation and eliminated threats to human health and the environment for industrial

land uses. Removal of contaminated soil, implementation of baseline institutional controls and following a risk management plan protects human health and the environment.

1. Protection of Human Health and the Environment

Calculated risk from exposure to COCs in soil at AOC-5 were greater than the Ohio EPA's cancer risk threshold due to elevated PCBs. The removal of concentrations of PCBs in soil greater than 9.7 mg/kg reduced the cumulative cancer and non-cancer risks to less than target acceptable thresholds and therefore is protective of human health.

2. Attainment of Media Cleanup Objectives

The removal alternative achieved cleanup objectives associated with the PCBs within AOC-5.

3. Controlling the Sources of Releases

As discussed in the RFI documents, the sources of releases to soil and groundwater at the Site are believed to be historical and to be under control. The removal activities excavated PCB concentrations greater than 9.7 mg/kg in soil in AOC-5. Any residual sources of PCBs remaining after excavation (less than 9.7 mg/kg) will be controlled through the implementation of the baseline institutional controls.

4. Applicable Standards for Management of Waste

The remedy complied with regulatory waste management standards set forth in the Ohio Revised Code Chapter 3734 and Ohio Administrative Code Chapters 3745-50 through 57, 65 through 69, 205, 256, 266, 270, 273 and 279, and RCRA. Compliance with standards for management of wastes were met by compliance with all applicable federal, state, and local regulations during corrective measures implementation to ensure that the waste was managed in a protective manner. Based on PCB concentrations found, the material was not considered subject to the Toxic Substances Control Act.

5. Long Term Reliability and Effectiveness

The selected remedy, in tandem with baseline institutional controls, provided corrective actions that are expected to be permanent for the Site. Therefore, removal of PCB concentrations above 9.7 mg/kg in soil was an effective and reliable alternative.

6. Reduction of Toxicity, Mobility or Volume of Wastes

The selected remedy reduced volume of waste onsite, and if waste was treated prior to off-site disposal, this step may reduce toxicity, mobility, or both.

7. Short-Term Effectiveness

The remedy required minor planning and administrative steps to implement and was effective immediately upon implementation.

8. Implementation

The selected remedy's potential to impact the surrounding community with frequent truck and construction traffic during the excavation and off-site disposal of waste was addressed by implementing moderate engineering and administrative procedures to lessen the impact.

9. Costs

The cost of removing PCBs was approximately $300,000. However, this expenditure led to the resulting benefits of short- and long-term effectiveness; the ability to control source releases; and reduced toxicity, mobility, and volume of wastes.

5.3.3 Management of Asbestos Containing Material (ACM)

The asbestos containing material (ACM) present on Site was previously determined to be a non-RFI area in the approved CMS (2022). Though no complete exposure route to ACM currently exists, ACM at or near the surface will be managed in a manner such that it does not become friable and subsequently a hazard. The ACM management is included in this Decision Document as an AOC to be managed by RACER. The asbestos was not evaluated against the Remedy Selection Evaluation Criteria, and the RMP is considered sufficient to protect human health and the environment for this remedy. Ohio EPA has concluded that surface abatement

and implementing a long-term monitoring plan to periodically inspect impacted areas will protect human health and the environment. Surficial asbestos investigations conducted in 2019 demonstrated that maintenance activities, such as mowing, did not generate asbestos fibers that could pose a potential threat to human health (Haley & Aldrich, Inc., 2021a, Appendix I). Surficial abatement/monitoring is easy to implement and more cost-effective considering the limited funds of RACER Trust and the need for long-term maintenance of the closed landfill. A Risk Mitigation Plan will be required for any CE activities in this area, and restoration of cover after such activities is necessary to prevent potential exposure to sub-surface contaminants. The Risk Mitigation Plan will also include an annual inspection for the presence of ACM.

5.3.4 Historically Covered Settling Basin

The historically covered settling basin is included in this Decision Document as an AOC to be managed by RACER. Therefore, the historically covered settling basin was not evaluated against the Remedy Selection Evaluation Criteria the RMP is considered sufficient to protect human health and the environment for this remedy. Ohio EPA's selected remedy, supplementing the two areas identified in the Historically Covered Settling Basin with a minimum of six inches of cover over sludge material, will protect human health and the environment. Work will be completed using an approved work plan. A Risk Mitigation Plan will be required for any CE activities in this area, and restoration of cover after such activities is necessary to prevent potential exposure to sub-surface contaminants.

6.0 Responsiveness Summary

Ohio EPA solicited written comments on the Statement of Basis and proposed remedies during a public comment period from May 1, 2023, to June 15, 2023. Ohio EPA did not receive any comments during the public comment period.

7.0 Conclusion

In conclusion, as they meet the threshold criteria for remedy acceptability, Ohio EPA has selected the remedies discussed in Section 5.1: Corrective Measures Evaluation Criteria and

Summary of Remedy. The actions that RACER is required to take relative to each remedy component are as follows:

- Placing a sitewide amended environmental covenant restricting use to industrial activities only and preventing the extraction of ground water for potable uses, limiting building occupancy without a remedy or demonstration that facility complies with vapor intrusion standards, limiting excavation activities without a Risk Mitigation Plan, and prohibiting interference with the post-closure landfill unit without prior written approval from Ohio EPA.
- The excavation of PCB contaminated soils (completed in April 2023),
- The removal of asbestos containing material (ACM) under an approved Risk Mitigation Plan,
- The placement of supplemental soil on the Historically Covered Settling Basin through an approved work plan,
- A ground water monitoring plan, and
- Continued post-closure care of the existing hazardous waste landfill under DFFOs.

Compliance with the selected remedies and implementing DFFOs will ensure protection of human health and the environment.

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Figure 1: Project Locus

Figure 2: Former General Motors Fisher Guide Division: *View of the RACER Trust Elyria Property facing west toward the former GM plant facility (photo courtesy of RACER Trust)*

Figure 3: Site Plan

Figure 4: Areas Considered in Alternatives

Figure 5: Boundary of Environmental Covenant