

Our ref: 11209506

December 13, 2022

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

Work Plan – Decommissioning and Replacement of Monitoring Well MW 76R-17
2915 Dr. Martin Luther King Jr. Boulevard Facility, Anderson, Indiana

Dear Mr. Marshall

1. Introduction

On behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust, GHD Services Inc. (GHD) has prepared this Work Plan for the Decommissioning and Replacement of Monitoring Well MW 76R-17 (Work Plan) located in Tract B (North) on Sirmax North America Inc.'s (Sirmax') property located at 2915 Dr. Martin Luther King Junior Blvd., in Anderson, Indiana (Site). The purpose of the Work Plan is to describe the scope of work necessary to decommission and replace damaged monitoring well MW 76R-17.

2. Background

On March 29, 2022, GHD was on-Site to collect water levels from accessible monitoring wells, including monitoring well MW 76R-17. Based on GHD's observations, monitoring well MW 76R-17 located within the Site gravel access road appears to have been damaged by traffic and/or maintenance activities (i.e., snow removal). The monitoring well riser appears to have been broken at approximately 7 feet below ground surface (bgs) and bentonite has filled up the monitoring well. The monitoring well has been damaged beyond repair. A photographic log of the damaged monitoring well is provided in **Attachment 1**.

As discussed with the Indiana Department of Environmental Management (IDEM), monitoring well MW 76R-17 is to be decommissioned and replaced by a licensed driller. The following sections of this letter discuss the proposed field and reporting activities for completion of the Work Plan.

3. Monitoring Well Decommissioning

GHD will retain a licensed drilling contractor to complete monitoring well decommissioning activities for MW 76R-17 in accordance with the Drilling Procedures and Monitoring Well Construction Guidelines in the Indiana Administrative Code (312 IAC 13) which states that monitoring wells are to be terminated and restored in a manner that will protect ground water resources from contamination. Monitoring well MW 76R-17 is installed to 60 feet bgs and GHD recommends the monitoring well be decommissioned and replaced by over drilling. The stratigraphic log for MW 76R-17 is provided in **Attachment 2**.

4. Monitoring Well Installation

GHD is working with the current property owner (Sirmax), discussing the location of the replacement monitoring well. If it is decided that the monitoring well will be installed within the access road, to avoid potential future damage, a concrete slab/apron will be installed protecting the proposed replacement monitoring well and existing monitoring well MW 75. The other option being considered to avoid any potential future damage, is installing the replacement monitoring well for MW 76R-17 just off the access road (see **Figure 1**). The replacement monitoring well will be installed as per the details provided in the stratigraphic log for MW 76R-17 (**Attachment 2**).

The monitoring well will be developed at least 24 hours following installation. Development will consist of the removal of five to ten well volumes. The replacement monitoring well will be sampled during the October 2023 sampling event.

Soil cuttings and purge and decontamination water shall be containerized at the RACER Site in 55 gallon drums labelled with the date, the appropriate monitoring well identifier, and as "Awaiting Analytical" and staged at the Site. Upon receipt of analytical data, the waste will be appropriately profiled and disposed of off-Site by a licensed waste hauler.

5. Reporting

A summary of the field activities will be included in the 2023 Groundwater Monitoring Report.

6. Schedule

The following table outlines the anticipated completion dates for the activities described above:

Activity	Anticipated Completion
Monitoring Well Decommissioning and Installation	May 2023
Monitoring Well Development	May 2023
Groundwater Sampling	October 2023
Removal of Investigation Derived Waste	November 2023
Reporting	December 2023

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

Regards



Robert Catallo
Project Manager

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

Copy to: Robert Hare (RACER Trust)

Figures

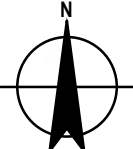


LEGEND

- SITE BOUNDARY
- RAILROAD
- POND BOUNDARY
- MONITORING WELL LOCATION

- POTENTIAL LOCATION OF REPLACEMENT MONITORING WELL
- DAMAGED MONITORING WELL

0 75 150 ft
Coordinate System:
STATE PLANE INDIANA
EAST - NAD83



REVITALIZING AUTO COMMUNITIES
ENVIRONMENTAL RESPONSE TRUST
2915 DR. MARTIN LUTHER KING JR. BLVD.
ANDERSON, INDIANA
WORK PLAN - DECOMMISSIONING AND
REPLACEMENT OF MONITORING WELL MW 76R-17
SITE PLAN

Project No. 11209506
Date December 2022

FIGURE 1

Attachments

Attachment 1



Photo 1: View of damaged monitoring well MW 76R-17



Photo 2: View of monitoring wells MW 76R-17 and MW 77 - facing south



Site Photographs

Attachment 2



STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

Page 1 of 3

PROJECT NAME: MLK BLVD

PROJECT NUMBER: 17302

CLIENT: RACER TRUST

LOCATION: FORMER ANDERSON GUIDE FACILITY

HOLE DESIGNATION: MW 76R-17

DATE COMPLETED: 5 October 2017

DRILLING METHOD: Geoprobe/HSA

FIELD PERSONNEL: T. Pranger

File: N:\CA\ST CATHARINES\LEGACY\LOG DATABASE\17302\17302\DATABASE\17302-T08-SC-2017.GPJ Library File: GHD_ENVIRO_V07.GLB Report: OVERBURDEN LOG Date: 13/12/22

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV.	MONITORING WELL	SAMPLE				
				NUMBER	INTERVAL	REC (%)		
	GROUND SURFACE TOP OF RISER	882.65 882.54						
	SAND AND GRAVEL							
2	SILT LOAM, very dark gray, dry, soft, slightly calcareous, contains organic material throughout, gradual contact @ 2.0ft	881.65 880.65						
	SILTY CLAY LOAM, grayish brown, dry, slightly hard, slightly calcareous, iron staining throughout	879.65						
4	SILTY CLAY LOAM, mixed grayish brown and dark grayish brown, moist, slightly firm, slightly calcareous, contains loam laminations - slight petroleum odor and staining from 5.00 to 5.90ft BGS							
6	LOAM, slightly pebbly, grayish brown, dry to moist, slightly hard to slightly friable, calcareous	876.75						
8	LOAM, pebbly, yellowish brown, dry, hard, slightly calcareous, contains occasional silt filled fractures	875.65						
		873.65						
10	LOAM, pebbly, grayish brown, dry, hard, slightly calcareous, contains occasional stones, silt skins, iron staining and trace dendrites							
		871.65						
12	LOAM, pebbly, gray, dry, hard, calcareous, massive, contains occasional stones							
14								
16								
18	- contains silty loam laminations and occasional silt skins at 17.00ft BGS							
20								
22	SILTY CLAY LOAM, slightly pebbly, gray, dry, hard to slightly hard, calcareous, massive, contains occasional stones - slightly moist to dry at 23.00ft BGS	861.65						
24								

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE



STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

Page 2 of 3

PROJECT NAME: MLK BLVD

PROJECT NUMBER: 17302

CLIENT: RACER TRUST

LOCATION: FORMER ANDERSON GUIDE FACILITY

HOLE DESIGNATION: MW 76R-17

DATE COMPLETED: 5 October 2017

DRILLING METHOD: Geoprobe/HSA

FIELD PERSONNEL: T. Pranger

File: N:\CA\ST CATHARINES\LEGACY\LOG DATABASE\6-CHARS\17000\017302\DATABASE\017302-T08-SC-2017.GPJ Library File: GHD_ENVIRO_V07.GLB Report: OVERBURDEN LOG Date: 13/12/22

DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV.	MONITORING WELL	SAMPLE				
				NUMBER	INTERVAL	REC (%)		
26	- contains occasional granules, slightly hard at 25.00ft BGS							
28	- contains silt and very fine sand laminations, becoming moist from 27.50 to 29.00ft BGS							
30	SILT LOAM, gray, moist to wet, friable, calcareous, very fine wet sand laminations throughout	853.65						
32	LOAM, grayish brown, moist, firm, calcareous, massive, contains occasional granules	851.65						
34	LOAM, pebbly, grayish brown, moist-dry, firm-hard, calcareous, massive, abrupt contact @ 44.0'	849.65						
36								
38								
40								
42								
44	LOAMY SAND, dark gray, saturated, abrupt contact @ 44.5'	838.65						
		838.15						
	SAND, coarse, pebbly	837.65						
46	SAND, medium-coarse, trace pebbles, very dark grayish brown, saturated, poorly washed and sorted							
48								
	SAND, coarse, pebbly, very dark grayish brown, saturated, poorly washed and sorted	833.65						

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE



STRATIGRAPHIC AND INSTRUMENTATION LOG (OVERBURDEN)

Page 3 of 3

PROJECT NAME: MLK BLVD

PROJECT NUMBER: 17302

CLIENT: RACER TRUST

LOCATION: FORMER ANDERSON GUIDE FACILITY

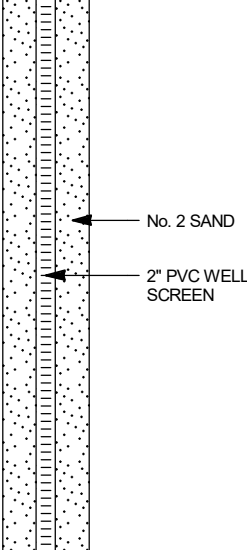
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DEPTH ft BGS	STRATIGRAPHIC DESCRIPTION & REMARKS	ELEV.	MONITORING WELL	SAMPLE				
				NUMBER	INTERVAL	REC (%)		
52								
54								
56								
58								
60	CLAY LOAM, dark gray, moist-wet, slightly hard, few pebbles - NOTE: Stratigraphy noted above from SB271/MW75/76 Installed by Earth Exploration PRJ#62806, 10/19/2004 at 60.00ft BGS END OF BOREHOLE @ 60.00ft BGS	823.85 822.65						
62								
64								
66								
68								
70								
72								
74								

WELL DETAILS

Screened interval:

832.65 to 822.65

50.00 to 60.00ft BGS

Length: 10ft

Diameter: 2in

Slot Size: 10

Material: PVC

Seal:

881.65 to 834.65

1.00 to 48.00ft BGS

Sand Pack:

834.65 to 822.65

48.00 to 60.00ft BGS

Material: No. 2 SAND

NOTES: MEASURING POINT ELEVATIONS MAY CHANGE; REFER TO CURRENT ELEVATION TABLE