



August 20, 2019

Reference No. 017302

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

Dear Mr. Marshall:

**Re: Response to IDEM Comments  
2018 Annual Monitoring Report RCRA Corrective Action  
2915 Dr. Martin Luther King Jr. Boulevard Facility  
Anderson, Indiana**

On behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust, GHD Services Inc. (GHD) prepared and submitted the 2018 Annual Monitoring Report RCRA Corrective Action (Report) to the Indiana Department of Environmental Management (IDEM) on January 31, 2019. On June 10, 2019, IDEM provided RACER Trust with comments on the Report, a copy of which is included as Attachment A.

On behalf of RACER Trust, GHD has prepared the following responses to IDEM's June 10, 2019 comments.

***Comment 1***

***The 2018 ground water sampling appears sufficient to be in compliance with the Site-Wide Groundwater Monitoring Plan dated October 28, 2010 (VFC # 59127512). GHD sampled ground water in April and October 2018, and surface water from the central irrigation pond on April 18, July 12, and October 19, 2018.***

***The facility currently performs ground water monitoring for volatile organic compounds (VOCs) and field measurements for natural attenuation parameters. In this letter, we propose to save money on the ground water sampling to extend the availability of the funds allocated to the Site.***

***RACER conducted semiannual ground water sampling for VOCs from April 2014 to October 2018, and in April 2019; however, GHD has not reported the 2019 results yet. Analytical results show that the VOC plumes are expanding at a low rate. Some VOCs in some ground water monitoring wells have statistically significant decreasing or increasing trends, and some may be stable. However, it appears that the migration rates of the plumes are sufficiently slow and may not pose an immediate risk to human health and the environment. In consequence, we are proposing the following:***

***In the report, GHD requested to discontinue collecting field parameters for monitored natural attenuation (MNA). We agree with this request. Similarly, we propose that GHD shift from semiannual ground water sampling to sampling every 18 months, with the possible exception of***



***specific ground water monitoring wells. For example, ground water monitoring MW 89-11, that RACER installed near a home, may require more frequent monitoring. If RACER and GHD agree to this proposed schedule, the next site wide ground water sampling event will take place in October 2020.***

***Response***

RACER Trust and GHD agree with IDEM to shift from semi-annual ground water sampling to sampling every 18 months.

As stated in the 2018 Annual Report, GHD recommends sampling monitoring wells MW16, MW 29, MW 46, MW 49, MW 59, and MW 84 in October 2019 to assess current groundwater quality and support the development of the Final Corrective Measures Proposal (CMP). Based on recent and historical sampling results, a revised long term groundwater monitoring program will be proposed as part of the draft Final CMP.

RACER Trust and GHD propose the following schedule:

- Site-Wide Water Level Measurements and Groundwater Sampling of Select Monitoring Wells - October 2019
- Submit 2019 Groundwater Monitoring Report – January 2020
- Site-Wide Groundwater Monitoring Event – October 2020
- Submit 2020 Annual Monitoring Report RCRA Corrective Action – January 2021

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

Sincerely,

GHD

A handwritten signature in blue ink that reads "Robert Catallo".

Robert Catallo, B.Sc.

RC/mma/57

Encl.

cc: Robert Hare (RACER Trust)

# Attachment A



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204  
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

June 10, 2019

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

Dear Mr. Hare:

Re: *2018 Annual Monitoring Report RCRA Corrective Action*

Dated January 31, 2019

VFC # 82686041

RACER Trust, MLK Boulevard (Motors  
Liquidation Co.)

Madison County

EPA ID # IND980700801

We received the *2018 Annual Monitoring Report RCRA Corrective Action* (report) dated January 31, 2019, from GHD Services, Inc. (GHD) on behalf of RACER Trust (RACER). The following comments are the result of our review.

The 2018 ground water sampling appears sufficient to be in compliance with the *Site-Wide Groundwater Monitoring Plan* dated October 28, 2010 (VFC # 59127512). GHD sampled ground water in April and October 2018, and surface water from the central irrigation pond on April 18, July 12, and October 19, 2018.

The facility currently performs ground water monitoring for volatile organic compounds (VOCs) and field measurements for natural attenuation parameters. In this letter, we propose to save money on the ground water sampling to extend the availability of the funds allocated to the site.

RACER conducted semiannual ground water sampling for VOCs from April 2014 to October 2018, and in April 2019; however, GHD has not reported the 2019 results yet. Analytical results show that the VOC plumes are expanding at a low rate. Some VOCs in some ground water monitoring wells have statistically significant decreasing or increasing trends, and some may be stable. However, it appears that the migration rates of the plumes are sufficiently slow and may not pose an immediate risk to human health and the environment. In consequence, we are proposing the following.

In the report, GHD requested to discontinue collecting field parameters for monitored natural attenuation (MNA). We agree with this request. Similarly, we propose that GHD shift from semiannual ground water sampling to sampling every 18 months, with the

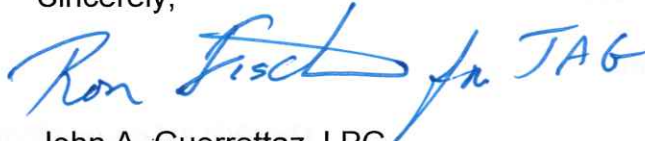


Mr. Robert Hare  
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possible exception of specific ground water monitoring wells. For example, ground water monitoring well MW 98-11, that RACER installed near a home, may require more frequent monitoring. If RACER and GHD agree to this proposed schedule, the next site wide ground water sampling event will take place in October 2020.

Thank you for your continuing cooperation. 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,



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

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