



Revitalizing Auto Communities
Environmental Response Trust

February 23, 2016

Mr. Bryan Duzak
Ohio Department of Commerce
Division of State Fire Marshal - BUSTR
8895 East Main Street
P.O. Box 687
Reynoldsburg, OH 43068-9009

RE: Interim Response Action (IRA) Notification, South Tank Farm, RACER Trust Moraine
Facilities, Moraine, OH
BUSTR Release # 57000002-N00002

Dear Mr. Duzak:

Revitalizing Auto Communities Environmental Response Trust (RACER Trust) is pleased to submit the attached *Interim Response Action Notification Form* for the above referenced site (**Figure 1**). The IRA strategy consists of limited excavation and off-site disposal of soils in the area immediately surrounding soil boring SSB-3 (soil analytical data shown on **Figure 2**). The total volume of excavated soil is not expected to exceed 93 cubic yards; therefore, no pre-approval from the Bureau of Underground Storage Tank Regulations (BUSTR) is required. The IRA Notification Form is enclosed. The limits of the excavation are shown on **Figure 3**.

Confirmatory soil sampling will be completed of the side walls and bottom of the excavation. The excavation will be less than 400 cubic yards, therefore a total of five samples will be collected (4 sidewall samples and 1 bottom sample). The samples will be biased towards areas with the highest contamination based on visual staining and/or screening results from a photoionization detector. All samples collected will be analyzed for TPH-diesel range organics (C₁₀-C₂₀) and TPH-oil range organics (C₂₀-C₃₄).

Once the IRA field activities have been completed, an IRA Completion Report will be completed and submitted to BUSTR. The IRA Completion Report will summarize the excavation activities and the confirmation sampling results. Assuming that the confirmation soil sample results are below the Tier 1 Action Levels, a No Further Action (NFA) Request will be requested for this release.

If you have any questions, please contact me at (937) 751-8635.

Sincerely,

A handwritten signature in black ink that reads "Pamela L. Barnett". The signature is written in a cursive, flowing style.

Pamela L. Barnett, PG
Assembly Region Cleanup Manager (DE, LA, MA, OH, PA, VA)
RACER Trust

cc: B. Gitzinger, Ohio EPA
Mirtha Capiro, U.S. EPA



INTERIM RESPONSE ACTION (IRA) NOTIFICATION FORM

(Due ten days prior to beginning the IRA)

OWNER/OPERATOR AND FACILITY DATA

FACILITY INFORMATION:

COMPANY: RACER Trust

ADDRESS: 3600 Dryden Road

CITY: Moraine, Ohio

COUNTY: Montgomery

ZIP CODE: 45439

LAT/LONG: Latitude 1483371.6285
Longitude 620717.283

FACILITY ID #: 57000002

OWNER/OPERATOR INFORMATION:

COMPANY: RACER Trust

ADDRESS: 500 Woodward Avenue,
Suite 2650

CITY, STATE: Detroit, MI

ZIP CODE: 48226

CONTACT PERSON: Pam Barnett

OWNER OPERATOR

Description of IRA:

Soil from SSB-3 contains total petroleum hydrocarbons (TPH) C10-C20 and C20-C34 at concentrations higher than Ohio Bureau of Underground Storage Tank Regulations (BUSTR) Tier 1 Action Levels in the former South Tank Farm of the above referenced site. This soil will be excavated, live loaded, and disposed of at an off-site landfill approved to receive such material. These activities will be conducted as an Interim Response Action (IRA) subject to this form. A Tier 1 Source Delineation has been completed, with the results being presented to BUSTR via Revised Tier I Investigation Form, dated July 6, 2015. BUSTR approved the Tier I Investigation via letter dated December 11, 2015.

The IRA will involve a shallow excavation (approximately 25 feet wide by 25 feet long by 4 feet deep) to address TPH C10-C20 and C20-C34 exceedances identified during the Tier I Investigation (Please note that the excavation will also consist of previously excavated soils shown by a red dashed line in Figure 2). Monitoring well SMW-3 will be abandoned during the excavation, as it is located in the center of the proposed excavation area. Groundwater at this location is expected to be approximately 18 ft below ground surface and will not be encountered during the excavation. Monitoring well SMW-3 will not be reinstalled following the excavation. Soil grab samples will be collected from the excavation sidewalls, and the bottom of the excavation. These samples will either be collected directly, or using the bucket of the excavator. The samples will be submitted for laboratory analyses of TPH (C10-C20) and TPH (C20-34) each per United States Environmental Protection Agency (U.S. EPA) Method 8015, to confirm that all soil exhibiting constituents of TPH higher than the Tier 1 Action Levels have been removed.

All soil samples will be shipped to a traditional laboratory and the open excavation will be fenced off while waiting for results to maintain site security. Once the confirmation sampling results are received, and are confirmed to show that the Tier 1 Action Levels have been met, the excavation will be backfilled to grade with coarse aggregate fill or equivalent (e.g., ASTM 21AA) purchased commercially off-site. Any concrete encountered during the excavation activities will also be disposed of off-site along with the soil subject to excavation.

Anticipated volume of soil to be removed:	Approximately 93 cubic yards
Estimated volume of free product and/or ground water to be recovered:	No free product or groundwater is anticipated to be encountered
The anticipated length of time of the IRA:	Approximately 1 to 3 weeks

ATTACHMENTS:

- A Site Map indicating the limits of the proposed excavation is attached. (No free product has been found.)
- A proposed Sampling and Analysis Plan is included on the cover letter.

PRIOR APPROVAL MUST BE OBTAINED IF ANY OF THE FOLLOWING APPLY:

- The combined total volume of soil to be excavated for all tier evaluations will be greater than eight hundred cubic yards;
- The anticipated time to initiate and complete the interim response action is greater than three months; or
- More than one interim response action is to be conducted.

Yes No Prior approval from BUSTR is required

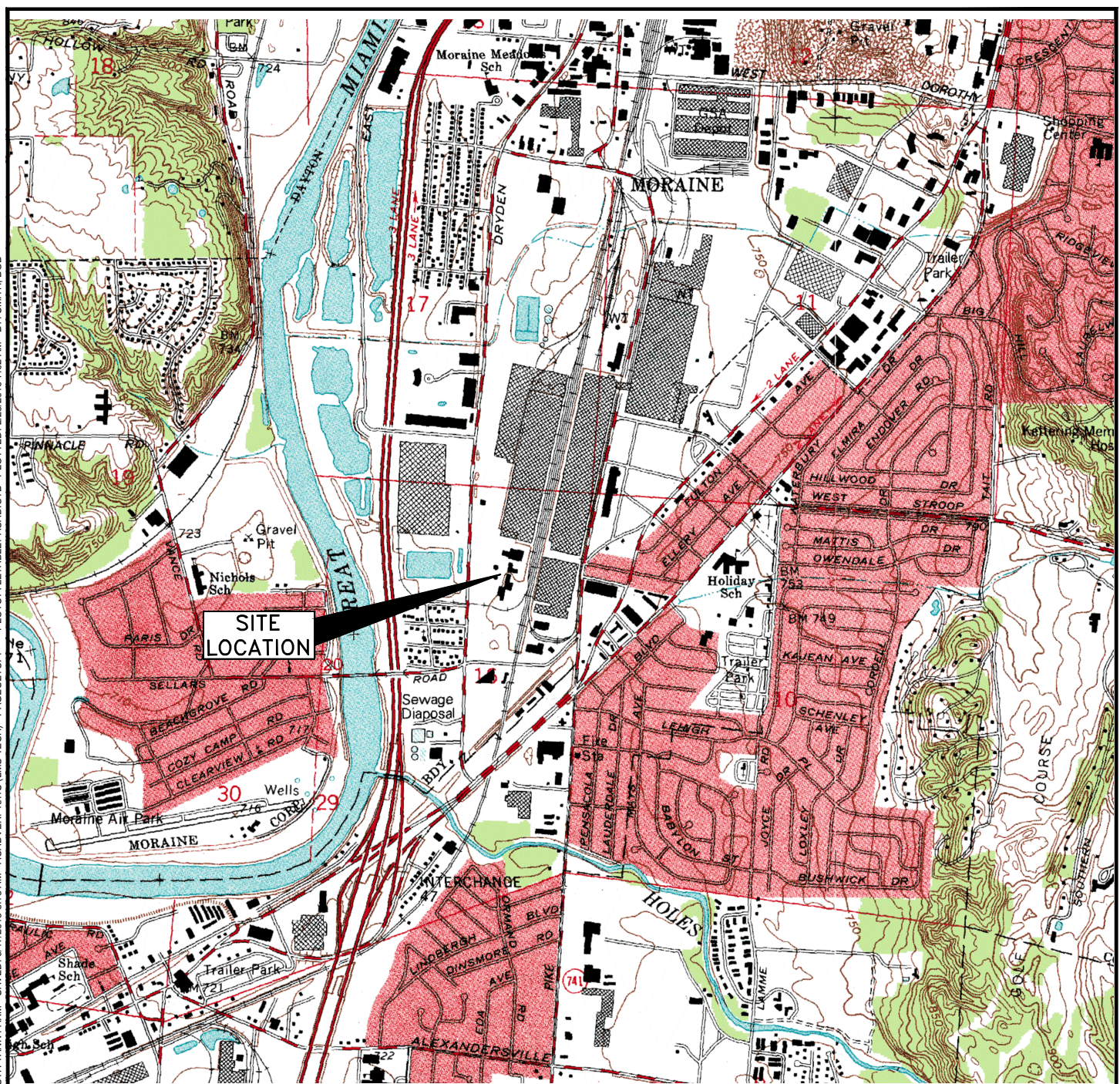
OWNER / OPERATOR SIGNATURE: *Pamela L. Barnett*

PRINT NAME: Pam Barnett **DATE:** 2/23/2016

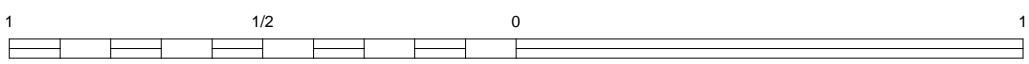
FORM PREPARED BY:

NAME: Robert Wolford
 COMPANY: ARCADIS U.S., Inc
 ADDRESS: 100 E. Campus View Blvd., Suite 200,
Columbus, OH 43235
 PHONE #: 614-985-9103
 EMAIL: Robert.Wolford@arcadis-us.com

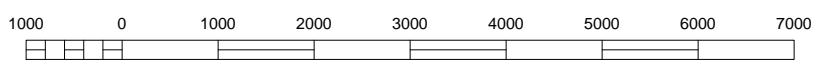
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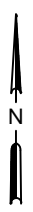
SCALE 1:24 000



SCALE IN MILE



SCALE IN FEET: 1" = 2000'



OHIO QUADRANGLE LOCATION

REFERENCE: USGS 7.5 MINUTE QUADRANGLE; DAYTON SOUTH, OHIO 1966, PHOTO REVISED 1991.

RACER TRUST
 MORaine, OHIO
 OH000294.2015

**SITE LOCATION MAP
 (FORMER SOUTH TANK FARM)**



FIGURE

1

