



Ms. Paula Bansch
Hazardous Waste Permits
Office of Land Quality
Indiana Department of Environmental Management
100 North Senate
Indianapolis, IN 46204-2241

Subject:
Class 1 Permit Modification Request
RACER Trust, Indianapolis, Indiana, USEPA ID INR000021436

Dear Ms. Paula Bansch:

In accordance with 40 CFR 270.42(a), this letter serves as a request for a Class 1 Permit Modification on behalf of Revitalizing Auto Communities Environmental Response (RACER) Trust for the GM Former Allison Gas Turbine (AGT) Division surface impoundment that was closed as a land disposal facility (Facility) located in Indianapolis, Indiana (EPA ID INR000021436). The Post Closure Permit Renewal for the Facility was issued by the Indiana Department of Environmental Management (IDEM) on January 26, 2007.

This Class 1 Permit Modification was completed to update the Appendix E-Contingency Plan with the new address information for ARCADIS. Additionally, the local hospital moved locations and the updated local hospital is Wishard Hospital. Phone information for the hospital, local fire department and police are updated. A track changes electronic copy is provided on electronic CD including reference of all the above mentioned changes.

ARCADIS U.S., Inc.
132 E. Washington
Street
Suite 600
Indianapolis
Indiana 46204
Tel 317 231 6500
Fax 317 231 6514
www.arcadis-us.com

ENVIRONMENT

Date:
January 30, 2013

Contact:
Heather Gastineau-
Lyons
Phone:
317-236-5214

Email:
heather.gastineau-lyons@arcadis-us.com

Our ref:
IN000297.2012.0003

IDEM
Ms. Paula Bansch
January 30, 2013

In accordance with 40 CFR 270.42(a), ARCADIS, on behalf of RACER Trust, will make the required notification to interested parties within 90 calendar days of the date of this letter.

If you have any questions regarding these comments, please contact us at 317-231-6500 or Robert Hare at 419-277-0815.

Sincerely,

ARCADIS U.S., Inc.



Heather Gastineau-Lyons, L.P.G.
Project Geologist



Sarah Fisher
Project Manager

Enclosures:

Appendix E: Contingency Plan (paper, electronic MS Word, including track changes document)

Copies:

Robert Hare, Cleanup Manager (CD)

Certification

Certification: I certify, under penalty of law, that this document and attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

INR000021436
U.S. EPA I.D. Number

Closed Hazardous Waste Surface Impoundment, RACER Trust
Site Name



Robert W. Hare, P.E., CHMM
RACER Trust
Cleanup Manager (IL, IN, KS, MO, NJ, WI)

1-17-2013

Date

Post-Closure Permit Application

Appendix E: Contingency Plan

USEPA INR000021436

Updated: January 30, 2013



Post-Closure Permit
Application

Appendix E: Contingency
Plan

USEPA INR000021436

Prepared for:
Revitalizing Auto Communities
Environmental Response Trust

Prepared by:
ARCADIS
132 E. Washington Street
Suite 600
Indianapolis
Indiana 46204
Tel 317 231 6500
Fax 317 231 6514

Our Ref.:
IN000297.2012

Date:
January 11, 2006
Updated: January 30, 2013

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Drawing 1: Site Map



Purpose

The purpose of this contingency plan is to comply with the submitted Post-Closure Permit Application Attachment C-3, to address requirements in section 40 CFR 264, Subpart C. The facility is designed, constructed, maintained and operated to minimize the possibility of any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment.

Facility Identification and General Information

Name: RACER Trust
Address: 2701 West Raymond Street
Indianapolis, Indiana

Owner/ Operator:
Revitalizing Auto Communities Environmental Response (RACER) Trust
2930 Ecorse Road
Ypsilanti, MI 48198
Attn: Robert Hare

Emergency Coordinators:

Robert W. Hare, P.E., CHMM
2930 Ecorse Road
Ypsilanti, MI 48198
First Phone Number: (313) 486-2908
Second Phone Number: (419) 277-0815

Sarah Fisher
ARCADIS
132 East Washington Street, Suite, 600
Indianapolis, Indiana 46204
First Phone Number: (317) 231-6500
Second Phone Number: 317-691-4011

Heather Gastineau-Lyons
ARCADIS
132 East Washington Street, Suite, 600
Indianapolis, Indiana 46204
First Phone Number: (317) 231-6500
Second Phone Number: (317) 514-0078



Type of Facility:

The closed surface impoundment (Site) is an unmanned 10.269 acre grass-covered field. The Site is surrounded by a 6 foot tall chain-linked fence with access gates in the northeast, northwest, and southwest corners of the fence which are kept locked at all times except during maintenance and monitoring activities.

Facility Site Map is on next page (Drawing 1).

Description of Generator Activities

No hazardous waste is generated from the various processes at the Site.

Emergency Coordinators

Principle (24-Hour Emergency Contact): Robert W. Hare, P.E., CHMM
First Phone Number: (313) 486-2908
Second Phone Number: (419) 277-0815

Alternate 1 Sarah Fisher, ARCADIS
First Phone Number: 317-231-6500
Second Phone Number: 317-691-4011

Alternate 2 Heather Gastineau-Lyons, ARCADIS
First Phone Number: 317-231-6500
Second Phone Number: 317-514-0078

The emergency coordinator or alternate are responsible for coordinating all emergency response measures for the facility required under this plan. They are thoroughly familiar with:

- The facility's contingency plan
- All operations and activities at the facility.
- The location and characterization of waste handled.
- The location of all records within the facility.
- The physical layout of the facility.



Implementation of the Contingency Plan

The Contingency Plan will be implemented if an incident might threaten human health or the environment. The emergency coordinator has full authority to make this decision.

The contingency plan must be implemented whenever an incident might involve hazardous waste anywhere at the Site. Depending on the degree of seriousness the following potential emergencies might call for the implementation of the contingency plan:

Spills- A release of any on-Site generated waste resulting from broken piping which cannot be contained on-Site resulting in off-Site soil contamination and/or ground or surface water pollution.

Emergency Response Procedures for Spills

Immediately Upon Discovery of an Emergency

An employee discovering a spill involving hazardous waste will call:

Emergency Procedure

Rolls Royce Plant 5 Security (adjacent facility) 230-5555

Emergency Coordinators:

Principle: Robert W. Hare, P.E., CHMM
2930 Ecorse Road
Ypsilanti, MI 48198
First Phone Number: (313) 486-2908
Second Phone Number: (419) 277-0815



Alternate: Sarah Fisher
ARCADIS
132 East Washington Street, Suite, 600
Indianapolis, Indiana 46204
First Phone Number: (317) 231-6500
Second Phone Number: (317) 691-4011

Alternate: Heather Gastineau-Lyons
ARCADIS
132 East Washington Street, Suite, 600
Indianapolis, Indiana 46204
First Phone Number: (317) 231-6500
Second Phone Number: (317) 514-0078

The emergency coordinator or alternate will respond immediately to the call and assess the situation. The emergency response contractors are:

ARCADIS
132 East Washington Street, Suite, 600
Indianapolis, Indiana 46204
(317) 231-6500

The emergency coordinator will assess the situation by identifying the character, exact source, amount and extent of released material. He or she will also make an assessment of possible threats to human health and the environment.

If an incident could threaten the environment or human health outside the RACER Trust property, the emergency coordinator will contact the following:

In the unlikely event that an incident occurs that adversely impacts the Site, the following local resources are available and should be contacted immediately if required to address an emergency situation:

Local Fire Department:	317-247-8501
Indianapolis Fire Department:	317-327-6041
Wishard Hospital:	317-639-6671
Local Police:	317-327-6400
Indianapolis Police:	911
Marion County LEPC:	317-252-3230



If the incident is a reportable incident, the emergency coordinator will call and report the incident to the **National Response Center** at:

800-424-8802

The report will include the following:

- Name and telephone number of the reporter.
- Name and address of the facility.
- Time and type of incident.
- Identification and quantity of materials involved.
- The possible hazards to the environment and human health outside the facility.

In addition, if the incident is a reportable incident, the emergency coordinator will contact **Indiana Department of Environmental Management (IDEM), Office of Emergency Response** at:

888-233-7745

During the Emergency Control Phase:

The emergency coordinator will take all necessary measures to contain the hazard within the facility property and to prevent its spread to other nearby properties, with the assistance of emergency contractors and local emergency personnel. The emergency coordinator or designee will monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate. Emergency personnel will be provided details concerning the on-Site types of emergency equipment to be used and the need for personal protective equipment.

Immediately After the Emergency

The emergency coordinator must provide for the storage and disposal of recovered waste, contaminated soil or surface water, or any other material. The material must be handled as a hazardous waste unless it is a characteristic hazardous waste only, which is analyzed and determined not to be hazardous.

All emergency equipment must be cleaned and made fit for its intended use before operations are resumed.



The emergency coordinator will investigate the cause of the emergency and will take steps to prevent recurrence of such or similar incidents.

The emergency coordinator will make sure that cleanup and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that the EPA and local authorities have been notified prior to permitting the resumption of the operation affected by the emergency.

Emergency Equipment

Fire extinguishers are present in the two buildings located on Site. Additionally, personnel entering the Site will have a first-aid kit available.

Coordination Agreements and Telephone Numbers

ARCADIS
132 East Washington Street, Suite, 600
Indianapolis, Indiana 46204
(317) 231-6500

The above recipient has been sent a copy of the contingency plan and has agreed to provide emergency services to RACER Trust in the event there is an emergency.

Evacuation Plan

Contract employees will be evacuated if the emergency coordinator decides that their personal safety is in danger.

If evacuation is necessary, the contract employee will exit through the northeast gate. Drawing 1 contains the evacuation plan for the Site.

Required Reports

Within fifteen (15) days of any incident requiring the implementation of the contingency plan, the emergency coordinator will file a report with the EPA Regional Administrator and the Assistant Commissioner of the Office of Solid Waste and Hazardous Waste Management (OSHWM). The report will include the following:

- Name, address and telephone number of the owner/operator.
- Name, address and telephone number of the facility.



- Date, time and type of incident.
- Name and quantity of material involved.
- An assessment of actual or potential hazards to human health and the environment.
- Estimated quantity and disposition of recovered material that resulted from the incident.

The emergency coordinator will note in the operating record the time, date and details of any incident that requires implementation of the contingency plan.

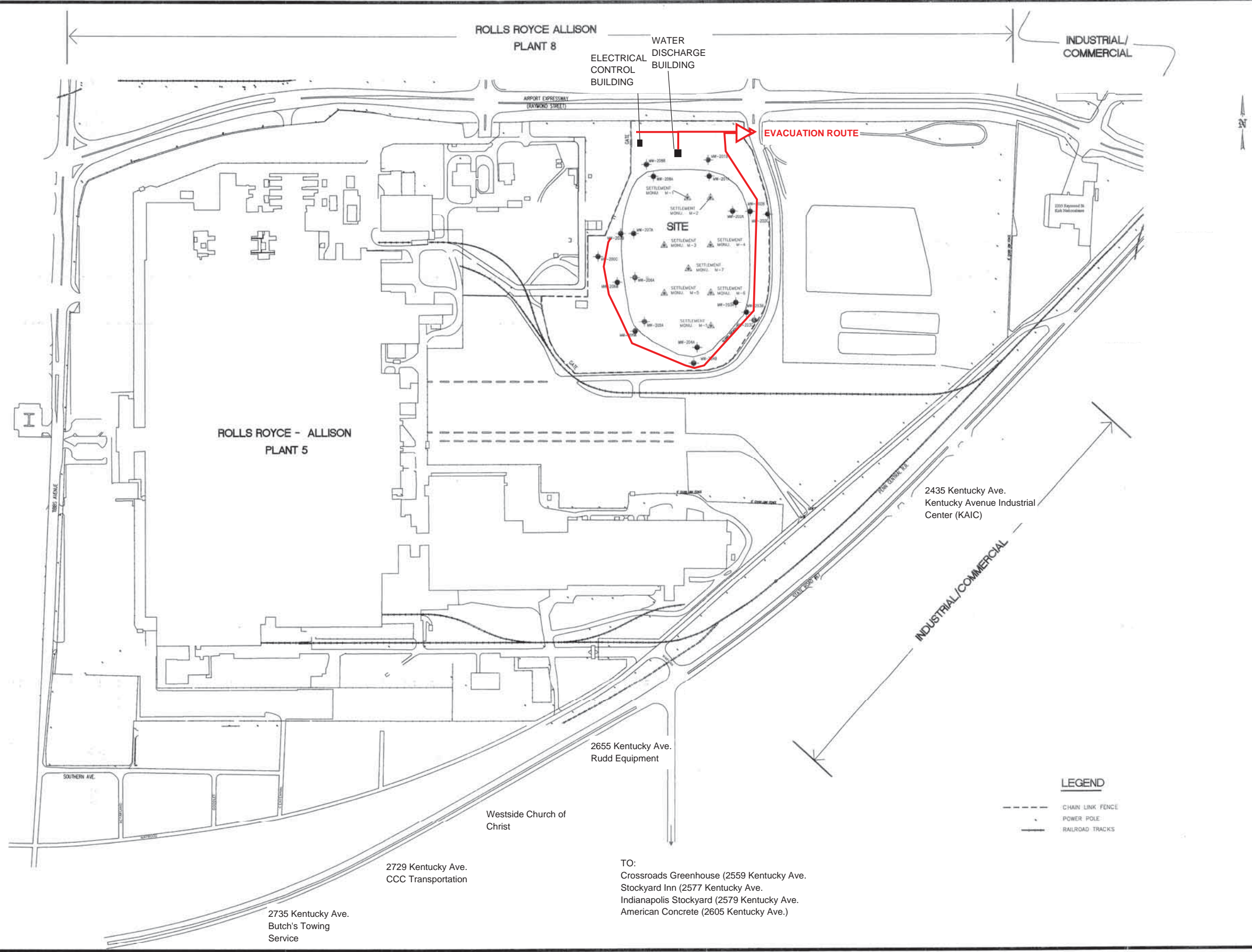
Amendment of Contingency Plan

RACER Trust, or its representatives, will review and amend this contingency plan whenever the following situations apply:

- Applicable regulations are revised.
- The plan fails in emergency.
- The facility changes in its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for releases.
- The list of emergency coordinators changes.
- The list of emergency equipment changes.

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GENERAL MOTORS CORPORATION 2701 W. RAYMOND STREET INDIANAPOLIS, INDIANA		SITE MAP CLOSED HAZARDOUS WASTE SURFACE IMPOUNDMENT	
PROJECT NO. 60512.20	FIGURE 1		
REV. NO.	SCALE: 1" = 200'	PROJ. MGR. DESIGNED BY: REUSED BY:	DESCRIPTION DRAWN BY: APPROVED BY: DATE:
	0 100' 200'		
		MB	12-10-99
		GZA GeoEnvironmental, Inc.	
		BY	DATE