INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

July 1, 2019

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

Dear Mr. Hare:

Re: Bedrock Groundwater Investigation Report
RACER Trust
Site No. 13200
Dr. Martin Luther King Jr. Boulevard Site
Anderson, Indiana
IND980700801

IDEM reviewed the March 19, 2019, *Bedrock Groundwater Investigation Report of Findings* (VFC # 82726171) submitted by GHD Services Inc. (GHD) for RACER Trust's Dr. Martin Luther King Jr. Boulevard site. The report provides a summary of the ground water sampling activities performed at the site to delineate the extent of bedrock ground water contamination. IDEM's comments are enclosed.

Please submit one hard copy and one electronic copy (in .pdf format) of a response to the enclosed comments, to this office, within 45 days of receipt of this letter.

If you have questions, please contact Robert Marshall at (317) 232-4534 or rmarshal@idem.IN.gov.

Sincerely,

Donald W. Stilz, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

REM
Enclosure
cc: Robert Catallo, GHD (w/ enclosure)
Shannon Richardson, GHD (w/ enclosure)
Thierry Liberge, IDEM (w/ enclosure)
Namrata Patel, IDEM (w/ enclosure)

Bedrock Groundwater Investigation Report of Findings
RACER Trust – Site No. 13200
Dr. Martin Luther King Jr. Boulevard Site
Anderson, Indiana
IND980700801

1. The sampling and analysis methodologies are acceptable; however, the field sheets for the collected ground water samples were not provided. Well stabilization parameters were provided in Table 2 of the report and it appears samples were collected after stabilization; however, IDEM staff cannot determine if there were any issues with drawdown, pump depths, etc. This information should be provided.

2. The ground water sample results indicated concentrations of cis-1,2-dichloroethylene (cis-1,2-DCE) in sample MW-81 (78 ppb), and vinyl chloride (VC) in samples MW-81 (27 ppb) and in MW-83 (12 ppb) were above the *Remediation Closure Guide* (RCG) ground water screening levels (GWSLs). All other target compound list (TCL) volatile organic compounds (VOCs) were either below the RCG GWSLs and/or non-detect in the collected ground water samples from wells MW-62, MW-74, MW-77, MW-81, MW-82, MW-98-18, and MW-99-18. The ground water sample results are summarized in Table 4 of the report. The horizontal and vertical extent of ground water contamination appears to be delineated, once appropriate field documentation is provided and reviewed.

3. According to the chain-of-custody form and laboratory analytical sample results, it appears a ground water sample GW-101018-AF-046 was collected and analyzed for TCL VOCs; however, the results for this sample were neither reported nor discussed in the document. Based on the laboratory analytical results, concentrations of cis-1,2-DCE (300 ppb) and VC (240 ppb) were above the RCG GWSLs. Of these, a concentration of VC remains above the RCG commercial vapor intrusion ground water screening level of 35 ppb. All other TCL VOCs were non-detect in the sample. GHD should clarify where this sample was collected from and why it was not reported nor discussed in the document.

4. The minimum data documentation requirements (MDDRs) provided for the collected ground water samples were adequate in supporting the sample results; however, full QA/QC, along with raw data, should be provided for the collected ground water samples for validation. The IDEM QA/QC documentation requirements can be found in Section 3.9.1 (Table 3-A) of the RCG and on the internet at: www.in.gov/idem/cleanups/files/remediation_closure_guide.pdf. The following was noted for the MDDRs provided.

    a. A ground water field duplicate sample was collected from MW-82 and analyzed for VOCs and the results were in good agreement.

    b. A matrix spike/matrix spike duplicate was performed on ground water sample