



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Interim Director

RECEIVED  
APR 10 2014

April 7, 2014

RE: RACER TRUST PROPERTIES LLC-ELYRIA  
POST CLOSURE PERIOD EXTENSION  
CORRESPONDENCE  
RCRA C-HAZARDOUS WASTE  
LORAIN COUNTY  
OHD004201091

Ms. Pamela L. Barnett  
Assembly Region Cleanup Manager  
RACER Trust  
2930 Ecorse Road  
Ypsilanti, Michigan 48198

**Subject: Extension of Post-Closure Period for Former General Motors Fisher Guide Landfill**

Dear Ms. Barnett:

On February 3, 2014, the Ohio Environmental Protection Agency (Ohio EPA) sent RACER Trust a letter regarding extending the Post-Closure Care period for the General Motors Fisher Guide Elyria Landfill, located at 1400 Lowell Street, Elyria, Ohio. The current thirty (30) year Post-Closure Care period for the landfill is scheduled to expire on October 7, 2018. In your February 21, 2014 e-mail, RACER proposed to extend Post-Closure Care and monitoring of the GM Elyria landfill an additional twenty (20) years to the year 2038. It is anticipated that Post-Closure Care, to some extent, will be required for an extended period of time. Therefore, Ohio EPA recommends a thirty (30) year extension to the year 2048.

As Ohio EPA noted in our February 3, 2014 letter, this presents an opportunity for RACER to propose modifications to your approved Post-Closure Inspection and Maintenance Work Plan (August 2005) and Revised Post-Closure Groundwater Monitoring Plan (April 2007). Ohio EPA received a draft proposal for modifications. Ohio EPA also would be amenable to a proposed reduction on the frequency or the number of wells currently being monitored for the landfill. Discussion on modifications can commence now.

Ohio EPA's preferred administrative approach is to have the facility petition the Agency to extend the period under Ohio Administrative Code 3745-66-18 (G) (1) (a) (ii). This rule reads, in part:

"The post-closure plan and length of the post-closure care period may be modified any time prior to the end of the post-closure care period...The owner or operator... may petition the director to extend or reduce the post-

MS. PAMELA L. BARNETT  
GM ELYRIA LANDFILL  
APRIL 7, 2014  
PAGE 2

closure care period applicable to a hazardous waste management unit or facility based on cause, or alter the requirements of the post-closure care period based on cause. The petition must include evidence demonstrating that: The requested extension in the post-closure care period or alteration of post-closure care requirements is necessary to prevent threats to human health and the environment."

The petitioning process includes a public notice period.

Ohio EPA would like to proceed with the extension of the Post-Closure period expeditiously. Ohio EPA requests submittal of the petition to extend the Post-Closure Care to be submitted in the near future. If you have any questions, contact information is listed below.

Sincerely,



Bill Lutz  
District Representative  
Division of Environmental Response and Revitalization  
Telephone: (330) 963-1245  
[bill.lutz@epa.ohio.gov](mailto:bill.lutz@epa.ohio.gov)

BJL/nvr

ec: Ed Lim, Ohio EPA, CO, DERR  
Harry Courtright, Ohio EPA, NEDO, DERR  
Rod Beals, Ohio EPA, NEDO, DERR  
John Palmer, Ohio EPA, NEDO, DERR