



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
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100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

October 13, 2011

Mr. Robert W. Hare  
Cleanup Manager  
RACER Trust  
2930 Ecorse Road  
Ypsilanti, MI 48198

Dear Mr. Hare:

Re: *Groundwater Data Statistical Evaluation –  
First Half 2011*, Dated September 2, 2011  
VFC # 63499453, GM Former AGT Division  
Marion County EPA ID IND000021436

On September 8, 2011, IDEM received this document from ARCADIS on behalf of RACER Trust. We reviewed the report of the May 2011 sampling event and the statistical evaluation of the data from that sampling event.

We find the document does not comply with the Post-Closure Permit (Permit) dated January 26, 2007. The electronic data submittal for the May 2011 sampling event does not follow the format requirements of your Permit and it is apparent that some of the figures are missing out of the report.

The electronic data submitted September 6, 2011, in conjunction with the statistical evaluation report, does not follow the format specified in Tables 3 and 4 of Appendix H of your Permit. Table 3 states under the "Concentration" header, the entry on each line must be in numeric format. The headers and data listed beneath the headers, were not consistent with the headers listed in Table 4 of Appendix H of your Permit. Please provide the electronic data in the prescribed format.

Attachment 3 was not complete in providing the required box plots for all of the indicator parameters. Only arsenic (Figure 2-1) was represented in the report. Please provide additional box plots as specified in the text of Attachment 3 of the report.

Please submit revised electronic data following the prescribed format and Figures 2-2 through 2-9 as specified in Attachment 3 of the report within 30 days of receiving this letter.



Mr. Robert W. Hare  
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Thank you for your attention to this matter. If you have questions, please contact Mr. Harold Templin at htemplin@idem.IN.gov or (317) 232-8711.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Guerrettaz". The signature is fluid and cursive, with the first name "John" being more prominent and the last name "Guerrettaz" following in a similar style.

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

hrt

cc: Marion County Health Department  
Ms. Diana Osborne, OLQ  
Ms. Jennifer Reno, OLQ