



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

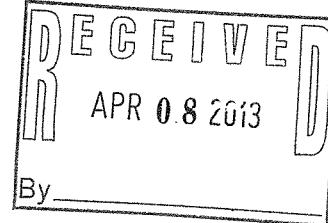
Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

April 5, 2013

Mr. Robert W. Hare, P.E., CHMM
2930 Escorse Road
Ypsilanti, MI 48198

Dear Mr. Hare:



Re: Class 1 Permit Modification
Racer Trust (Former AGT Site)
Indianapolis, Indiana
INR000021436

IDEM received your January 30, 2013 Class 1 Permit Modification request (VFC #67326857). The modification addressed updates to the Contingency Plan.

The revised pages of your modified hazardous waste permit are enclosed. These modified permit conditions replace the relevant permit conditions in the permit issued January 26, 2007. The following section of the permit has been modified:

Appendix E, Contingency Plan.

Within 90 days after the change is put into effect, you must send a notice of the modification to all persons on your facility mailing list and to local government units (40 CFR 270.42(a)). Please also send a copy of the notification to Glynda Oakes at goakes@idem.IN.gov.

Your facility mailing list has recently been updated. Many "interested parties" now accept e-mailed notices, allowing you to reduce postage costs. To receive your updated mailing list, please contact Glynda Oakes at goakes@idem.IN.gov, or (317) 233-1052.

If you have questions, please call Paula Bansch at (317)232-3243.

Sincerely,

Victor P. Windle, Chief
Hazardous Waste Permit Section
Permits Branch
Office of Land Quality

Enclosure

cc: Ms. Sarah Fisher, ARCADIS (with enclosure) ✓
Ms. Heather Gastineau-Lyons, ARCADIS (with enclosure)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
HAZARDOUS WASTE POST-CLOSURE PERMIT

Name of Permittee: RACER Trust

Facility Location: 2701 West Raymond Street, Indianapolis, IN

EPA Identification Number: INR000021436

Issuance Date: January 26, 2007

Expiration Date: February 16, 2017

Date Modified	Modification Type	Description of Modification
March 2012	Class 1 Prior Approval	Transfer of Ownership
March 2012	Class 1 Prior Approval	Groundwater Monitoring Schedule
April 2013	Class 1	Contingency Plan

Authorized Activities

Pursuant to Indiana Environmental Statutes (IC 13) and the rules promulgated thereunder and codified in Title 329 of the Indiana Administrative Code, Article 3.1 (329 IAC 3.1), the State permit conditions (hereinafter called the permit) of the Resource Conservation and Recovery Act of 1976 (RCRA) permit are issued to RACER Trust (hereinafter called the Permittee) to maintain and monitor a closed hazardous waste landfill located at 2701 West Raymond Street, Indianapolis, Indiana, Section 21, Township 15N, Range 3E at latitude 39° 45' 55" N and longitude 086° 12' 50" W, Maywood, Indiana Quadrangle, on the U.S. Geological Survey topographic map.

The State RCRA program is authorized under 40 CFR Part 271 and Section 3006 of RCRA to administer the hazardous waste management program in lieu of the Federal program.

The Permittee operated a hazardous waste surface impoundment which through closure was converted to a landfill. The legal status of the unit thereafter is that of a landfill, however, the past status of the unit may still be referenced for clarity.

The Permittee is required to maintain and monitor the closed landfill for the duration of this permit.

Federal regulations 40 CFR Parts 260 through 270 have been incorporated by reference. Where exceptions to incorporated Federal regulations are necessary, these exceptions will be noted in the text of the State rule (329 IAC 3.1-1-7).

Revised April 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

Post-Closure Permit

Appendix E: Contingency Plan

USEPA INR000021436

Table of Contents

Purpose	1
Facility Identification and General Information	1
Description of Generator Activities	2
Implementation of the Contingency Plan	3
Emergency Response Procedures for Spills	3
Coordination Agreements and Telephone Numbers	6
Evacuation Plan	6
Required Reports	6
Amendment of Contingency Plan	7

Drawings

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, 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, IN 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
St. Frances 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 personnel 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 to not 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 and 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.

