

Mr. Harold Templin
Geology Section
Permits Branch, Office of Land Quality
Indiana Department of Environmental Management
100 North Senate
Indianapolis, IN 46204-2241

Subject:

Response to IDEM letter dated October 13, 2011
GM Former AGT Division, Indianapolis, Indiana, USEPA ID INR000021436

Dear Mr. Harold Templin:

This letter serves as a response on behalf of RACER Trust to IDEM's letter outlining the incomplete items in the Groundwater Data Statistical Evaluation Report on October 13, 2011. ARCADIS had a phone conversation with Mr. Harold Templin on November 15, 2011, in which ARCADIS first became aware of the October 13, 2011 letter. Mr. Templin agreed to receive a response letter after the 30 day deadline since ARCADIS was not carbon copied. Please find a description of the incomplete items below and our responses.

FINDING: The electronic format for the submission of ground water data from the laboratory and field parameters is prescribed in Table 3 of Appendix H of the effective Permit. The electronic format report submitted is incomplete. The sixth item in Table 3 states an entry under the 'Concentration' header should 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.

RESPONSE: ARCADIS contacted the Office of Land Quality Database (Diana Osborn) the week of November 14th, 2011 to discuss the electronic submittal format to ensure that ARCADIS understands the requirements so that no errors are included in future submittals. Please find the attached electronic dataset for the 1st half 2011 sampling event. The electronic dataset has also been emailed to Diana Osborn.

ARCADIS
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ENVIRONMENT

Date:
November 17, 2011

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

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

Our ref:
IN000297.2011

FINDING: 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.

RESPONSE: *Please find the attached box plots for the indicator parameters in Figures 2-2 through 2-9.*

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

Sincerely,

ARCADIS

A handwritten signature in dark ink, appearing to read "Heather Gastineau-Lyons".

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

A handwritten signature in blue ink, appearing to read "Sarah Fisher".

Sarah Fisher, C.H.M.M.
Project Manager

Enclosures:

Attachment 2: Figures 2-2 through 2-9
Composite CD

Copies:

Robert Hare, Cleanup Manager RACER Trust (CD)