



April 6, 2014
Mr. Bryan Duzak
Bureau of Underground Storage Tank Regulations
8895 East Main Street
P.O. Box 687
Reynoldsburg, Ohio 43068

RE: Extension Request
Additional Information Requested for the South Tank Farm
RACER Trust Moraine Facilities, Moraine, Ohio
BUSTR Release # 57000002-N00004

Dear Mr. Duzak:

Revitalizing Auto Communities Environmental Response Trust (RACER Trust), respectfully requests an extension of the deadline for submittal of the Additional Information Requested for the South Tank Farm (STF) of the RACER Trust Moraine Facilities site (Site) in Moraine, Ohio. The Bureau of Underground Storage Tank Regulations (BUSTR) requested the additional information in a letter to RACER Trust dated January 7, 2015.

RACER Trust completed a Tier 1 Investigation for the STF. The investigation activities included the installation of three soil borings (SSB-1 through SSB-3) on June 10, 2014 that were converted to three monitoring wells (SMW-1 through SMW-3). Soil samples were collected and submitted for analysis of target compound list (TCL) semi-volatile organic compounds (SVOCs) and total petroleum hydrocarbons (TPH) (carbon ranges C₁₀ to C₂₀, and C₂₀ to C₃₄). Groundwater samples were collected on June 16, 2014 and were submitted for analysis of TCL SVOCs. The results of the investigation indicated that concentrations of TPH in one soil sample from the 0 to 2-foot interval exceeded the applicable standards, and concentrations of bis (2-ethylhexyl) phthalate in the three groundwater samples collected slightly exceeded the applicable standards.

On October 22, 2014, RACER Trust submitted the results of the Tier 1 Investigation and requested that BUSTR provide the United States Environmental Protection Agency (US EPA) with the authority to negotiate the appropriate actions to address the TPH and bis (2-ethylhexyl) phthalate exceedances under the Resource Conservation and Recovery Act (RCRA) Corrective Action activities that are on-going at the Site.

The January 7, 2015 letter from BUSTR indicated that confirmatory sampling at the former location of tank #2 (soil boring SSB-1) should be completed, delineation of constituents of concern in all directions from soil boring SSB-3 should be completed, and findings should be submitted on a Tier 1 Investigation Form. BUSTR indicated that the

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deadline for submittal of the additional information requested is April 8, 2015.

RACER Trust requests that the April 8, 2015 deadline be extended to July 10, 2015 to allow time for additional communications between RACER Trust, the US EPA, and BUSTR. Communications between the US EPA, the Ohio Environmental Protection Agency (Ohio EPA), and RACER Trust regarding the approach for addressing soil and groundwater exceedances in the STF are on-going. The STF is in the general area of several solid waste management units being investigated under RCRA Corrective Action with the US EPA and the Ohio EPA. Therefore, RACER Trust would like to gain an understanding of the US EPA's opinion on the approach and communicate this opinion to BUSTR prior to implementing additional work.

If you have any questions or would like to schedule a meeting, please contact me at (937) 751-8635.

Sincerely,



Pamela L. Barnett, PG
Cleanup Manager (DE, LA, MA, OH, PA, VA) RACER Trust

cc: Mirtha Cápiro, U.S. EPA
Brian Gitzinger, Ohio EPA