



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

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Commissioner

August 10, 2017

Mr. Robert Hare
Cleanup Manager
RACER Trust
500 Woodward Avenue, Suite 2650
Detroit, MI 48226

RECEIVED AUG 15 2017

Dear Mr. Hare:

Re: *2016 Annual Monitoring Report RCRA
Corrective Action*
Dated January 31, 2017
VFC # 80414704
RACER Trust, MLK Boulevard (Motors
Liquidation Co.)
Madison County
EPA ID # IND980700801

We received the *2016 Annual Monitoring Report RCRA Corrective Action* (report) dated January 31, 2017, from GHD Services, Inc. (GHD) on behalf of RACER Trust (RACER). The following comments are the result of our review.

We agree with the recommendations GHD presented in Section 9 of the report. We also appreciate the report's summary of the long-term (entire data sets) statistical trend results in Tables 9 and D-2. Due to the increase in number of observations, we recommend the facility report the short-term (last four to eight data points) statistical trends for compounds that already exhibit long-term increasing and decreasing trends, because short-term results may be different than the long-term ones.


We agree that, in general, compounds with less than 75% detection may not be suitable for statistical analysis (Section 4 of the August 15, 2010, *Site-Wide Groundwater Monitoring Plan* (GMP) (VFC # 57783785)); however, RACER should take into consideration the grouping and/or location of results below the laboratory method detection limit within the data set. For example, it makes a difference if all the non-detect values are at the start or at the end, chronologically, within the data set or if they are scattered throughout. RACER needs to evaluate whether compounds may become suitable for statistical analysis each year.

Based on our review of the annual report, we ask RACER to update the pairs of monitoring wells/compounds on which to perform statistical analysis as described above. For example, at a minimum, RACER needs to perform statistical analysis on trichloroethylene for MW-4 and MW 40; cis-1,2-dichloroethylene (cis) for MW 81 and MW 85; and cis and vinyl chloride (VC) for Pond Intake and Pond North.

Finally, RACER needs to delineate bedrock contamination horizontally and vertically. Bedrock monitoring well MW 81 has a statistically significant increasing trend of VC (with the maximum concentration of 66 µg/L on October 22, 2013, and the second highest concentration of 62 µg/L on October 8, 2015) and is the farthest downgradient monitoring well installed in bedrock. In addition, cis in MW 81 exhibits an increasing trend in concentrations considering the last six analytical results, starting in October 2011. The closest bedrock monitoring well to the west, MW 83, has an emerging increasing trend of VC even though it is not statistically significant. VC's maximum concentration in MW 83 is 5.3 µg/L on October 22, 2016. These increases in concentrations warrant horizontal and vertical delineation of volatile organic compounds in bedrock.

Thank you for your attention to these matters. If you have questions, please contact Mr. Thierry Liberge at tliberge@idem.IN.gov or call (317) 232 - 8712.

Sincerely,



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

cc: Robert Catallo, GHD
Shannon Richardson, GHD
Madison County Health Department
Robert Marshall, IDEM, OLQ, Hazardous Waste Permits Section