Reference No. 11209506



November 16, 2020

Mr. Rob Marshall Indiana Department of Environmental Management Office of Land Quality, Permits Branch 100 North Senate Avenue Room IGCN 1154 Indianapolis, IN 46204

Dear Mr. Marshall:

Re: Response to IDEM Comments Final Corrective Measures Proposal 2915 Dr. Martin Luther King Jr. Boulevard Facility Anderson, Indiana

On behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust, GHD Services Inc. (GHD) prepared and submitted the Final Corrective Measures Proposal (CMP) to the Indiana Department of Environmental Management (IDEM) on July 7, 2020. On September 22, 2020 IDEM provided RACER Trust with comments on the CMP, a copy of which is included as Attachment A.

On behalf of RACER Trust, GHD has prepared the following responses to IDEM's September 22, 2020 comments.

Comment 1

The document describes the current knowledge of soil and groundwater contamination at the site. Various constituents of concern (COCs) are present in both media. The proposed corrective measures include establishing institutional controls on the site parcels and monitored natural attenuation of the chlorinated volatile organic compounds (cVOCs) in groundwater. Contingency measures are also proposed in case of perceived threats to human health or the environment. These measures are reasonable, but incomplete.

Although the proposal mentions that cVOCs degrade naturally, the groundwater contaminant plumes are expanding in surface area and migrate downgradient; therefore, the plumes are not stable. Furthermore, GHD has not identified with precision the shape of the plumes and the cVOC sources. Some techniques, like high resolution site characterization (HRSC) may be useful in refining the current knowledge of subsurface contamination at the facility. HRSC is designed to define contamination in the subsurface at a very small scale that traditional investigations tend to miss. For example, HRSC can identify dense non-aqueous phase liquid that may potentially be responsible for backflow. Incidentally, the proposal mentions in Section 5.2.3 that there is "sufficient [trichloroethene] mass in the soils to account for the observed groundwater concentrations." This statement supports the use of HRSC. GHD should revise the proposal and add that the facility could use HRSC as one option in its contingency plan.





Response

Implementing HRSC techniques, such as using a membrane interface probe (MIP), have been evaluated for the Site and it was determined that based on the understanding of the two groundwater plumes, it would likely not provide any further information and would not be the best way to spend the remaining funds allocated for the Site for corrective actions. Below is summary of the two groundwater plumes based on investigations completed to date:

AOC 1- South Court

The results of the 2015 plume stability analysis for the South Court plume concluded that, while there is sufficient evidence of natural degradation occurring, there is likely an on-going source of trichloroethene (TCE) contributing to dissolved TCE in the South Court area groundwater and there is sufficient TCE mass in the soils to account for the observed groundwater concentrations. The results indicated that there has been little change to the planar plume area, average concentration, and plume mass in the South Court area despite the presence of degradation products. Despite the ongoing contribution of TCE from soils, degradation processes have been adequate to prevent the enlargement of the plume area. The 2015 findings were consistent with the results from the South Court Soil Investigation completed in 2014 when 10 boreholes were advanced and sampled in the area of the South Court plume.

Waste Water Treatment Plant (WWTP) Area

The results of the 2015 plume stability analysis for the WWTP Area provided evidence that there does not appear to be a constant TCE source in the unsaturated zone of the WWTP Area plume. The findings were consistent with the results from the WWTP Source Area Investigation completed in 2013 when 16 boreholes were advanced and sampled in the area of MW 68. The 2015 analysis concluded that TCE equivalent is decreasing in concentration and mass, while increasing in plume area advancing downgradient along the predominant flow direction. Degradation processes have contributed to the reduction in concentrations and mass in groundwater, but have not been adequate in this area to prevent the downgradient migration of the plume. Continued monitoring will determine if future migration creates an exposure pathway that should be addressed.

Comment 2

GHD should notify IDEM when a constituent exhibits a significant statistical trend and investigate the reasons for the trend. GHD should update the proposal to include trend analysis.

Response

Agreed. Consistent with the current Groundwater Monitoring Plan, the Revised Groundwater Monitoring Plan will include trend analysis.



Comment 3

Section 8.2 indicates that, following CMP approval, an ERC for Tract B (South) will be developed. IDEM's ERC templates have been revised to address a recent change in recording requirements; therefore, please utilize the enclosed RCRA ERC template for preparation of the draft ERC.

Response

Acknowledged.

Comment 4

A soil management restriction will be included in the Tract B (South) ERC. Please be aware that this will entail the preparation and approval of a Soil Management Plan (SMP), which will be referenced in the ERC. A SMP template has been enclosed for guidance in preparing the plan. In addition, the following sentence should be added to the end of ERC template restriction 1.d.:

"Any and all soil disturbance activities should be conducted in strict adherence to the approved Soil Management Plan (VFC #TBD) and all subsequent revisions."

Response

GHD and RACER Trust agree that the Tract B (South) ERC should include a soil management restriction, but believe that the Soil Management Plan (SMP) is best prepared by those planning on completing any construction within the tract, as opposed to a generic soil management plan developed by GHD/RACER Trust. To that end, the draft ERC will include a requirement for a SMP that must be approved by IDEM.

Should you have questions regarding the above, please do not hesitate to contact the undersigned.

Sincerely,

GHD

hobert Catallo

Robert Catallo, B.Sc.

RC/mma/1

Encl.

cc: Robert Hare (RACER Trust) Shannon Richardson (GHD)

Attachment A



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204 (800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb Governor

Bruno L. Pigott Commissioner

September 22, 2020

VIA E-MAIL

Mr. Robert W. Hare Cleanup Manager RACER Trust 1505 Woodward Ave., Suite 200 P.O. Box 43859 Detroit, MI 48226

Dear Mr. Hare:

Re: Final Corrective Measures Proposal RACER Trust Site No. 13200 Dr. Martin Luther King Jr. Boulevard Site Anderson, Indiana IND980700801

IDEM reviewed the July 7, 2020, *Final Corrective Measures Proposal* (VFC # 83002010), submitted by GHD Services Inc. (GHD) for RACER Trust's Dr. Martin Luther King Jr. Boulevard site. The document describes previously implemented corrective measures and includes an evaluation and proposal of final corrective measures for the site. IDEM's comments are enclosed.

Please provide a response to the enclosed comments within 60 days of receipt of this letter. If you have questions, please contact Robert Marshall at (317) 232-4534 or rmarshal@idem.IN.gov.

Sincerely,

Donald WSt

Donald W. Stilz, Chief Hazardous Waste Permit Section Permits Branch Office of Land Quality

REM

Enclosures

cc: Robert Catallo, GHD (w/ enclosures) Shannon Richardson, GHD (w/ enclosures) Thierry Liberge, IDEM (w/ enclosures) Namrata Patel, IDEM (w/ enclosures) Patricia Troth, IDEM (w/ enclosures)



Final Corrective Measures Proposal RACER Trust Dr. Martin Luther King Jr. Boulevard Site Anderson, Indiana IND980700801

1. The document describes the current knowledge of soil and groundwater contamination at the site. Various constituents of concern (COCs) are present in both media. The proposed corrective measures include establishing institutional controls on the site parcels and monitored natural attenuation of the chlorinated volatile organic compounds (cVOCs) in groundwater. Contingency measures are also proposed in case of perceived threats to human health or the environment. These measures are reasonable, but incomplete.

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- 2. GHD should notify IDEM when a constituent exhibits a significant statistical trend and investigate the reasons for the trend. GHD should update the proposal to include trend analysis.
- 3. Section 8.2 indicates that, following CMP approval, an ERC for Tract B (South) will be developed. IDEM's ERC templates have been revised to address a recent change in recording requirements; therefore, please utilize the enclosed RCRA ERC template for preparation of the draft ERC.
- 4. A soil management restriction will be included in the Tract B (South) ERC. Please be aware that this will entail the preparation and approval of a Soil Management Plan (SMP), which will be referenced in the ERC. A SMP template has been enclosed for guidance in preparing the plan. In addition, the following sentence should be added to the end of ERC template restriction 1.d.:

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