



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

February 1, 2017

REPLY TO THE ATTENTION OF:  
LU-16J

**VIA ELECTRONIC MAIL AND**  
**CERTIFIED MAIL #70010320000614522935**  
**RETURN RECEIPT REQUESTED**

Pamela L. Barnett  
RACER Trust  
500 Woodward Avenue, Suite 2650  
Detroit, Michigan 48226

Re: Revitalizing Auto Communities Environmental Response (RACER) Trust Moraine Facilities—Former Delphi Harrison Thermal Systems (OHD 000 817 577), Former Moraine Engine Plant (OHD 980 569 388), and Former Moraine Assembly Plant (OHD 041 063 074) – Pursuant to the Resource Conservation and Recovery Act (RCRA) Section 3008(h) 2011 Administrative Order on Consent (AOC), U.S. EPA Docket No. RCRA-05-2011-0016  
▶ Request for Interim Measures to Remediate Groundwater Contamination as Source of Vapor Intrusion Off-site

Dear Ms. Barnett:

The United States Environmental Protection Agency (US EPA) hereby directs RACER to implement interim measures to remediate groundwater contamination from volatile organic compounds (VOCs) as a source of vapor intrusion off-site from the Moraine Facilities. US EPA's request is based on the agency's determination that a) uncontrolled releases of contaminated groundwater have migrated off-site from the Moraine Facilities and become a source of vapor intrusion to residential and commercial properties in the Riverview neighborhood, b) RACER's on-going efforts to conduct sub-slab and indoor air sampling and necessary mitigation in the Riverview area, per the US EPA approved March 2011 Workplan, has not eliminated all potential unacceptable exposures from vapor intrusion to residents in the community, and c) the potential for unacceptable exposures exists at commercial properties in the Riverview area (these are currently being addressed through installed mitigation systems).

US EPA's determination is based on the following information:

- Residential/commercial properties affected by vapor intrusion consist of 60 homes and three commercial properties.
- RACER has sampled 45 properties (sub-slab and indoor air), including all commercial properties.
- EPA has recommended mitigation for 41 properties based on sampling results.

- 27 properties had mitigation systems installed, including all commercial properties. Owners of 17 homes have not agreed to provide RACER with access to their property after receiving EPA's recommendation to have a mitigation system installed.
- 13 homes have verified operation of the installed mitigation system. This indicates that owners of 14 homes out of 27 homes with installed mitigation systems have not allowed further access to their property by RACER to conduct post-installation performance testing for indoor air and to conduct operation and maintenance inspections to verify that their systems are, and continue to be, operational.
- RACER provides reimbursement for electrical cost associated with fan operation to those property owners that have verified operation of the mitigation system. Per the most recent agreement with US EPA, RACER is also providing reimbursement as compensation for loss of conditioned air caused by the system operation. Since the implementation of this reimbursement process, RACER has obtained agreement for access and participation in the vapor intrusion sampling and mitigation program from one additional home owner.

Based on this request, RACER shall proceed to implement the Directed Groundwater Recirculation (DGR) technology as an interim measure in the upper aquifer beneath the Riverview neighborhood, as presented in RACER's 2017 Annual Environmental Action Budget Request. On December 29, 2016, US EPA issued approval of RACER's budget request. In addition, RACER's Fourth Quarter 2016 Progress Report cites information on lessons learned received from the US Department of Energy Fernald Site for consideration in implementation of the DGR technology.

Within forty-five (45) days of receipt of this request, RACER shall submit to US EPA for review and approval a workplan for implementation of a pilot phase for the interim measure. The main objective of the pilot shall be to collect information on design parameters to support full design and implementation of the DGR technology. In addition, the workplan shall outline the scope and schedule for additional design and reporting deliverables for complete implementation of the interim measure.

Further, RACER has agreed to seal the foundations of homes where owners object to having a full mitigation system installed because of the potential loss of conditioned air in their homes, as a service to the Riverview community. By February 10, 2017, RACER will submit a memorandum to EPA outlining protocols for implementation of this service as an addendum to the approved September 2011 Mitigation Workplan.

For any questions regarding this letter, please contact Mirtha Cápiro of my staff at (312) 886-7567 or at [capiro.mirtha@epa.gov](mailto:capiro.mirtha@epa.gov).

Sincerely,



Carolyn Bury  
Acting Chief, Corrective Action Section 2  
Remediation and Reuse Branch  
Land and Chemicals Division

cc (electronic): Brian Gitzinger, Ohio EPA, [brian.gitzinger@epa.ohio.gov](mailto:brian.gitzinger@epa.ohio.gov)  
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