

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

Brian C. Rockensuess

Commissioner

July 1, 2024

VIA EMAIL

Ms. Emma TerBeek Engineer Racer Trust Surface Impoundment 500 Woodward Ave, Ste. 1510 Detroit, Mi 48226

> Re: Violation Letter

> > Racer Trust Surface Impoundment

INR000021436

Indianapolis, Marion County

Dear Ms. TerBeek:

On 6/25/2024, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Racer Trust Surface Impoundment, located at 2701 W Raymond St, Indianapolis, IN. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection: Compliance Evaluation Inspection

Results of Inspection: Violations were discovered and require a submittal.

Within thirty (30) days of receipt of this letter, a written detailed explanation, documenting compliance with each of the requirements listed in the inspection report, must be submitted to this office. Failure to respond adequately to this Violation Letter may result in a referral to the OLQ Enforcement Section. Please direct any response to this letter and any questions to Matthew Peterschmidt at (219) 771-1011 or mpetersc@idem.in.gov. Thank you for your attention to this matter.

Sincerely,

for

Susan Lowry Section Chief

Hazardous Waste Compliance Section

Compliance Branch

Enclosure





cc: Marion County Health Department



HAZARDOUS WASTE INSPECTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Inspector's Name:	Matthew Peterschmidt
Others Present	
Date:	Tuesday, June 25, 2024
Time In:	7:55 AM
Time Out:	9:05 AM
Inspection Type	Compliance Evaluation Inspection

		General Inform	ation		
Facility Information					
Facility Name		Racer Trust Surfa	ace Impoundment		
Facility Location		2701 W Raymond St Indianapolis, IN 46241 Marion County			
Facility Mailing Intormation		500 Woodward A Detroit, MI 48226	•		
Facility Contact S		Same as Primary	Facility Contact		
Primary Facility Contact During Inspection		Emma TerBeek Engineer (616) 914-4361 emma.terbeek@arcadis.com			
Other Facility Contact(s) During Inspection					
Facility ID					
EPA ID Number INR00002143		36	NAICS Code		52592
Facility Status					

Facility ID			
EPA ID Number	INR000021436	NAICS Code	52592
Facility Status			
File Status	Very Small Quantity Generator	Other Activities	
	·	-	•
Outstanding Issues			
Last Inspection Date	7/1/2022		
Previous Violations	C Yes © No		
Details			

Inspection Narrative

RACER Trust is a closed hazardous waste surface impoundment that through closure was converted to a landfill. The site is currently managed by Arcadis and is in the southwestern portion of Indianapolis inside the boundaries of the Rolls-Royce Corporation Plant 5. Rolls-Royce Corporation Plant 5 is in a heavily industrialized area and is primarily engaged in the manufacture and testing of gas turbine engines and diesel engine components.

The former plant #5 surface impoundment site covers approximately ten acres. The surface impoundment previously received water from several sources prior to discharging to Eagle Creek under a NPDES permit (IN0001813). Influents to the surface impoundment during its 40 years of operation include run-off, boiler blowdown water, water softener rinse water, ash quenching water, non-contact cooling water, and effluent from the WWTP. IDEM determined the surface impoundment was used to treat F007 and F009 waste resulting in the impoundment being classified as a hazardous waste surface impoundment.

A Closure Plan was approved by IDEM in 1992. A Certification of Closure Report was submitted to IDEM in 1995, amended in 1996 and was accepted by IDEM and considered completed with the 30-year post-closure care period beginning June 4, 1996. Nine groundwater extraction wells are located inside the perimeter of the cap area. Sixteen hydraulic head monitoring wells are in pairs inside and outside of the cut-off wall. Additionally, three monitoring wells were installed outside of the containment area into the lower aquifer. The groundwater extraction system, hydraulic monitoring

Matthew Peterschmidt

Page 1 of 6 Racer Trust Surface Impoundment/Tuesday, June 25, 2024

systems, and cut off wall substitute for the leachate collection system. For more information about this system, please see Attachment C of the Post Closure Permit. A storm sewer is located around the perimeter of the cap area. A drainage ditch is located around the perimeter of the cap to collect storm water from both the cap area and from outside the perimeter that drains to the ditch. Any storm water that percolates through the vegetative cover and topsoil to the PVC liner will drain toward the edge of the cap to be collected by drainage piping which rests on top of the geonet and below the geotextile. The drainage piping connects to the perimeter drainage ditch on all edges of the cap. The drainage ditch connects to the storm sewer in the northeast and southwest corner of the cap.

The inspection conducted at the surface impoundment on 6/25/2024 included walking the cap to look for signs of erosion, settlement, differential settlement, slopes, subsidence and displacement. Permanent benchmarks, run-off control system, the condition of the grass, security fence, signage, integrity of the run-off/run-on control system, extraction well system, and gas venting system were also observed. Additionally, I reviewed the facility's inspections logs. See photos 15 and 16. Financial Assurance and Annual Reports are reviewed by others in IDEM's Permit Section.

Occasionally, mowers scalp small sections of the cap. Once observed, these sections are re-seeded to cover bare spots. See photos 2, 4, and 8. Vegetative growth was observed along the west side perimeter fence line. This growth comes from Rolls Royce property and has not impacted the fence integrity at the time of inspection. The site does spray to control vegetative growth along the perimeter fence. See photo #5.

The facility has a contract with a professional exterminator who provides pest control services at the site. The exterminator has multiple traps set throughout the facility for voles and groundhogs. Groundhogs occasionally create holes in the fence surrounding the site so the fence around the facility is maintained regularly and, in several places, had been patched prior to my inspection. A recent, un-repaired hole in the perimeter fence was observed in the northwest corner of the site, though this hole appears to have been man-made. See photo #1. The exterminator has also placed several vole traps around the cap near the observed vole activity. During my inspection I observed some vole networks that had vole traps in the vicinity and several groundhog holes that were equipped with traps. See photos 6,7, and 9 through 14. Animal activity has decreased year over year and the site is actively maintaining mitigation efforts.

A violation was observed and requires a submittal to this office within 30 days of receipt of this report.

Regulatory Status				
Observed Activity	Very Small Quantity Generator	Other Activities	Hazardous Waste Surface Impoundment	
Documents Reviewed	Inspection Logs			
Comments				

	Waste Management
Comments:	
Waste Stream(s) Inform	nation
Waste Streams O Yes O No O No	t Inspected Not Applicable
	ation that varies from the most recent Annual Report (Example: additional waste streams, waste streams no t increase/decrease in generation rate, etc.)
Exempted/Excluded	☐ Yes ☐ No ☐ Not Inspected Not Applicable
Explanation	
Waste Management Are	eas
Container Management	Area(s) See No Not inspected Not applicable
Satellite Area(s)	☐ Yes ☐ No ☐ Not inspected Not applicable
Tanks, Restricted Wast	e Sites, and Other Regulated Units

☐ Yes ☐ No ☐ Not inspected Not applicable			
Environmental Releases			
Visible Releases/Contamination/Discharges	s • No Release Observed		
	nce Assistance		
P2 Information The following P2 suggestions could possibly save money, reduc	e waste and/or minimize risk. You might consider having a P2		
assessment, or a voluntary technical assistance consultation from https://www.in.gov/idem/ctap/ for additional information.			
Contact by IDEM OPPTA Requested Yes C	No		
P2 Suggestions			
. 2 009900000000000000000000000000000000			
Guidance Materials			
Guidance Materials Provided to Facility			
- 1			
	hecklist		
(Checked box indicated)	ates a compliance concern)		
Standards Hazardous Waste Determination	TSDF Permit Requirements ▼ TSDF Permit Requirements		
Recordkeeping (SQG and LQG)	Other Violation		
☐ Identifying Hazardous Waste Numbers (SQG and	outer violation		
LQG)			
☐ Generator Category Determination			
☐ Notification (SQG, LQG, Transporter, TSDF)			
Release to the Environment, Disposal of Solid			
Waste			
Illegal Dumping			
Other Violation			
	Tabana		
LQG Hazardous Waste Standards Accumulate for 90 Days or Less	SQG Hazardous Waste Standards Accumulate for 180 Days or Less		
Container Condition	☐ Accumulation Limit		
☐ Compatibility of Waste with Container	☐ Container Condition		
☐ Containers Closed	☐ Compatibility of Waste with Container		
☐ Container Handling	☐ Containers Closed		
Central Accumulation Area Inspection	☐ Container Handling		
☐ Ignitable or Reactive Wastes - Distance from	☐ Central Accumulation Area Inspections		
Property Line	☐ Conditions for Accumulation of Incompatible Wastes		
☐ Ignitable or Reactive Wastes - Sources of	Container Labeled "Hazardous Waste"		

Matthew Peterschmidt

Page 3 of 6 Racer Trust Surface Impoundment/Tuesday, June 25, 2024

Ignition/Reaction: "No Smoking" signs	Container Marked with Indication of Hazards
Conditions for Accumulation of Incompatible	Container Marked with Accumulation Start Date
Wastes	☐ Tank Operating Conditions
Container Labeled "Hazardous Waste"	☐ Tank Inspections
Container Marked with Indication of Hazards	☐ Tank Labeled "Hazardous Waste"
Containers Marked with Accumulation Start Date	☐ Tank Marked with Indication of Hazardous
Tank Integrity Assessment	☐ Tank Documentation for 180-Day Accumulation
☐ Tank Containment and Detection of Releases	☐ Land Disposal Restrictions
Tank General Operating Requirements	☐ Maintenance and Operation of Facility
☐ Tank Inspections	Required Equipment
Tank Subpart BB - Monthly Pump and Valve Monitoring	☐ Testing and Maintenance of Equipment
☐ Tank Subpart CC - Annual Inspection/Monitoring	Access to Communications or Alarm System
☐ Tank Labeled "Hazardous Waste"	☐ Aisle Space
☐ Tank Marked with Indication of Hazards	☐ Arrangements with Local Authorities
☐ Tank Documentation for 90-Day Accumulation	☐ Arrangements with Local Authorities - Documentation
☐ Maintenance and Operation of Facility	Emergency Coordinator
Required Equipment	☐ Emergency Information Posted
☐ Testing and Maintenance of Equipment	☐ Employee Training
☐ Aisle Space	☐ Other Small Quantity Generator Standards
Arrangements with Local Authorities	VSQG Standards
Arrangements with Local AuthoritiesArrangements with Local Authorities -	Hazardous Waste Generation Limit
	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit
☐ Arrangements with Local Authorities -	Hazardous Waste Generation Limit
Arrangements with Local Authorities - Documentation	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit
 □ Arrangements with Local Authorities - □ Documentation □ Contingency Plan Developed 	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination
 □ Arrangements with Local Authorities - Documentation □ Contingency Plan Developed □ Content of Contingency Plan 	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
 □ Arrangements with Local Authorities - Documentation □ Contingency Plan Developed □ Content of Contingency Plan □ Copies of Contingency Plan 	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
☐ Arrangements with Local Authorities - Documentation ☐ Contingency Plan Developed ☐ Content of Contingency Plan ☐ Copies of Contingency Plan ☐ Contingency Plan Quick Reference Guide	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
 □ Arrangements with Local Authorities - Documentation □ Contingency Plan Developed □ Content of Contingency Plan □ Copies of Contingency Plan □ Contingency Plan Quick Reference Guide □ Emergency Coordinator 	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
 □ Arrangements with Local Authorities - Documentation □ Contingency Plan Developed □ Content of Contingency Plan □ Copies of Contingency Plan □ Contingency Plan Quick Reference Guide □ Emergency Coordinator □ Personnel Training Program 	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
 □ Arrangements with Local Authorities - Documentation □ Contingency Plan Developed □ Content of Contingency Plan □ Copies of Contingency Plan □ Contingency Plan Quick Reference Guide □ Emergency Coordinator □ Personnel Training Program □ Personnel Training - Complete Within Six Months 	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions	☐ Hazardous Waste Generation Limit☐ Hazardous Waste Accumulation Limit☐ Hazardous Waste Determination☐ Proper Disposal
Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions Large Quantity Generator - Other Violations Satellite Accumulation - SQG and LQG	Hazardous Waste Accumulation Limit Hazardous Waste Determination Proper Disposal Prohibited Disposal of Liquids in Landfills Manifest and Recordkeeping - LQG and SQG
Arrangements with Local Authorities - Documentation Contingency Plan Developed Content of Contingency Plan Copies of Contingency Plan Contingency Plan Quick Reference Guide Emergency Coordinator Personnel Training Program Personnel Training - Complete Within Six Months Personnel Training Annual Review Personnel Training Documentation Personnel Training Record Retention Notification for Closure Land Disposal Restrictions Large Quantity Generator - Other Violations	Hazardous Waste Accumulation Limit Hazardous Waste Determination Proper Disposal Prohibited Disposal of Liquids in Landfills

☐ Container Condition	
Compatibility with Container	
☐ Incompatible Wastes	
☐ Containers Closed	
Container Labeled "Hazardous Waste"	
Container Marked with Indication of Hazards	
☐ Preparedness and Prevention	
☐ Excess Generation	
Fuicadia Compution	Harandana Casandami Matariala
Episodic Generation Notification	Hazardous Secondary Materials Reclaimed Under Control of the Generator
☐ EPA ID Number	☐ Contained
☐ Accumulate for 60 Days or Less	☐ Speculative Accumulation
☐ Accumulation Prohibitions	Notice
☐ Container Labeling	☐ Documentation of Legitimacy Determination
☐ Tank Labeling and Recordkeeping	☐ Emergency Preparedness and Response
Recordkeeping	☐ Emergency Procedures (Accumulates 6,000 kg or Less)
☐ Preparedness and Prevention	☐ Emergency Procedures (Accumulates Greater than 6,000
☐ Other Violation	kg)
	Other Violation
Ochord Ocademicated William Discussion	Out and Out of the Mineral Landau day Day Olayard
Solvent-Contaminated Wipes – Disposal Container Management (Non-leaking containers	Solvent-Contaminated Wipes - Laundered or Dry Cleaned Container Management (Non-leaking containers)
☐ Closed Containers	Closed Containers
☐ Labeling	☐ Labeling
☐ Accumulation Time	☐ Accumulation Time
☐ No Free Liquids	☐ No Free Liquids
☐ Free Liquids Management	☐ Free Liquids Management
☐ Documentation	Documentation
☐ Final Disposition	Clean Water Act
Universal Waste − All Facilities ☐ Universal Waste Labeling	Used Oil – All Facilities ☐ Rebuttable Presumption Applies
Containers - Closed, Good Condition, No Evide	nce Containers and Tanks in Good Condition
of Leaks	☐ Containers/Tank Labeling
☐ Universal Waste - Bulb Crushing Prohibition	Release Clean Up and Containment
	☐ Burning Restrictions - Generated On-site or DIY, .5M BTU

Description of Violation(s)

TSDF PERMIT REQUIREMENTS

TSDF PERMIT REQUIREMENTS

CITATION:

329 IAC 3.1-9 and 40 CFR 264.14(b) and (c): The Permittee shall comply with the security provisions described in the Post-Closure Plan, Attachment C.

DETAILS:

A hole was observed in the northwest corner of the perimeter fence by a overhead electrical pole and transformer. See photo #1.

REQUIRED ACTION:

Repair hole in security fence and submit evidence of repair to this office within 30 days of reciept of this report.

	Inspection Documentation
Photographs	YesNo
Мар	
GPS Location Collected	○ Yesⓒ No
Analytical Screening Conducted	○ Yes ○ No
Lab Sample	○ Yes No

Inspection Results/Actions			
Comments:			
Inspection R	esults		
Violations were discovered and require a submittal.			
Multi-Media Concerns			
No concerns i	noted		

Finalize Inspection				
Written Summary of Inspection				
	Printed/Typed Name	Matthew Peterschmidt		
	Phone Number:	(219) 771-1011		
Inspector Information	Email Address:	mpetersc@idem.in.gov		
	Signature:	Obtained on the Inspection Verification/Findings Form		
	Printed/Typed Name:	Emma TerBeek		
Facility Representative Signature	Signature:	Obtained on the Inspection Verification/Findings Form		

Photo Table: Racer Trust Surface Impoundment

Number	1
Description	Hole in northwest corner of perimeter fence by overhead electrical pole and transformer.
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

Number	2
Description	Reseeded area northwest corner on cap.
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

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Number	3
Description	Extraction well 210 power box
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.



Number	4
Description	Reseeded area west side on cap.
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

- Transition

Number	5
Description	Vegetation on west side perimeter fence
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.



Number	6
Description	Monitoring well 205A with vole bait container
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

Number	7
Description	Vole network south end midway between monitoring wells 205A and 204A
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

Number	8
Description	Bare spot on south cap south of monitoring well 204A
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

	Number
D	escription
Ph	otographer
Fa	cility Name
P	hoto Date
	Others

Number	9
Description	Settlement monument M8
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

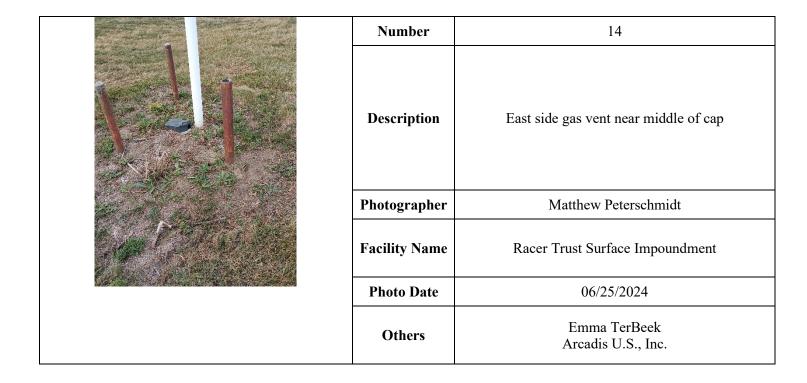


Number	10
Description	Groundhog hole and trap, also vole holes on east side cap
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

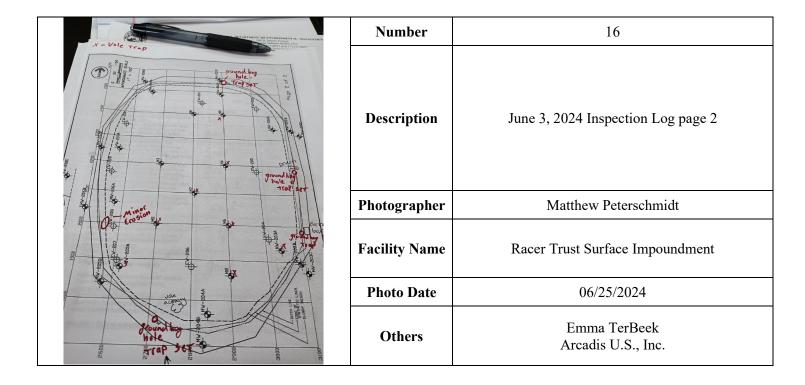
Number	11
Description	Ground hog hole and trap, vole holes on east side cap west of extraction well 203
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

一个一个一个一个	Number	12
	Description	Ground hog hole and trap in drain middle of east side
	Photographer	Matthew Peterschmidt
	Facility Name	Racer Trust Surface Impoundment
	Photo Date	06/25/2024
	Others	Emma TerBeek Arcadis U.S., Inc.

Number	13
Description	Ground hog holes in need of bentonite refilling east side cap west of monitoring well 202 A
Photographer	Matthew Peterschmidt
Facility Name	Racer Trust Surface Impoundment
Photo Date	06/25/2024
Others	Emma TerBeek Arcadis U.S., Inc.

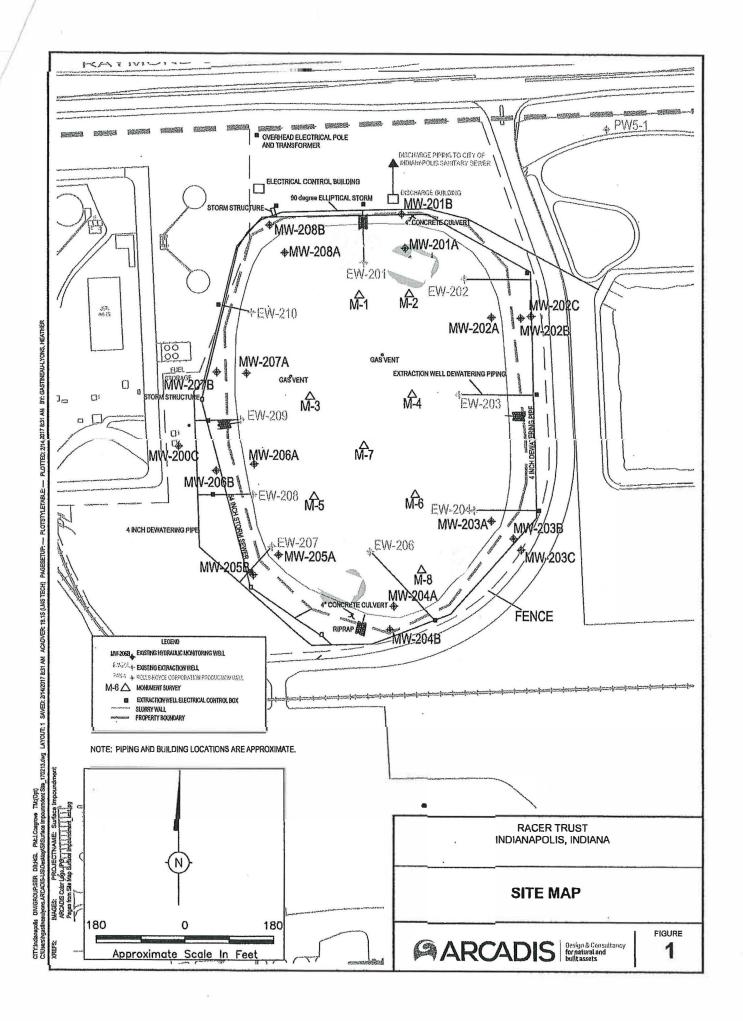


			Number	15	
CLOSET MACHINE The phase we be used to describe the control of the property of the phase of the	too of robotile conditions will be de- 2 of 2 of this inspection checkels. Time: OP Date: G- Condition Fail	ntified on the figure of the	Description	June 3, 2024 Inspection Log page 1	
Systems - Inspect discharge points of cover drainage and gas Venting Systems - Inspect discharge points of cover drainage and gas venting systems for blockage. 7. Integrity of Cut-off Wall -	good	No Action	Photographer	Matthew Peterschmidt	
Some-annualy - Measure water levels in all monitoring wells and calculate the rise rate of water within the aluny wall and compare to water within the aluny wall and compare to water within the aluny wall and compare to provide the samples, and the samples of the proper operation, protective casing for integrity, and tables for readability. Some-annualy - Measure total well dight to check for sitation (completed during groundwater sampling).	NA good	N/A MW-204 B Needs new Label	Facility Name	e Racer Trust Surface Impoundment	
Extraction Well System Functionality - Quarterly - Inspect groundwater extraction system control building for proper functioning. Annually - Turn on extraction wells.	NA	NA	Photo Date	06/25/2024	
		Page 1 of 2	Others	Emma TerBeek Arcadis U.S., Inc.	



			Number	17
CLOSED HAZARDOUS	Condition Condition Location Fears Location Location	and closure inspections will be consumer to the consumer approximate approximate the consumer to the consumer	Description	March 28, 2024 Inspection Log page 1
Integrity of Run-on and Run-off Controls - Inspect culverts and perimeter drainage ditch for hindrances to flow. Mark any areas needing maintenance.	Clear	clear	Photographer	Matthew Peterschmidt
Integrity of Cover Drainage and Gas Venting Systems - Inspect discharge points of cover drainage and gas venting systems for Council Wall - Semi-annually - Measure water levels in all monitoring wells and calculate the rise rate of water within the siurry wall and compare to previous new rates (completed as part of Previous Previous Previous Council Previous Previo	cleof 264 B, needs n	Clear	Facility Name	Racer Trust Surface Impoundment
proper operation, protective casings for integrity, and labels for readability. Semi-annually - Measure total well depth to check for siltation (completed during groundwater sampling).	Label		Photo Date	06/25/2024
Extraction Well System Functionality - Quarterly - Inspect groundwater extraction system control building for proper functioning. Innually – Turn on extraction wells.			Others	Emma TerBeek Arcadis U.S., Inc.

	Number	18	
POST-CLOSURE INSPECTION CHECKLEST CLOSED MAZARDOUS WAST SUBMICE MINOURDINGTY This checkles will be used to decement the feeting of the processor of the proces	Description	March 28, 2024 Inspection Log page 2	
ditch for arosino clamage. State galles exceeding 3 inches in depth for future repair. 3. Cover Settlement Subsidiance, and unusual settlement or clamage, and the final cover expellen for obvious low spots and animal cover expellen for obvious low spots and animal cover expellen for obvious low spots and animal cover system for bare areas and quality of vegetation. Over Contidors . Import final cover system for bare areas and quality of vegetation. Mark bare areas for researching. 5. Integrity of Ruin-on and Ruin-off Controls			
needing maintenance. 6. Integrity of Cover Drainage and Gas Venting Systems - Inspect discharge points of cover drainage and gas venting systems for	Photographer	Matthew Peterschmidt	
biocloge. 7. Integrity of Cut-off Wall - Semi-semually - Measure water levels in all Semi-semually - Measure water levels in all water within the surray wall and compare to provious rise rates (completed as part of groundwater sampling).	Facility Name	Racer Trust Surface Impoundment	
8. Monitoring Well Condition - Inspect locks for proper operation, protective casings for integrity, and labels for readability. Semi-annually - Measure total well depth to check for sillation (completed during groundwater sampling).	Photo Date	06/25/2024	
Extraction Well System Functionality - Quarterly - Inspect groundwater extraction system control building for proper functioning.	Others	Emma TerBeek Arcadis U.S., Inc.	



INSPECTION **VERIFICATION/FINDINGS**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue Indianapolis, Indiana 46204-2251 Telephone: (800) 451-6027 or (317) 232-8603

Web Page: http://www.in.gov/idem/

On 6/35/3034 an inspec representative of the Indiana Department	tion of RACER T	mant (IDEM) Office of Land Ove	onducted by the undersigned
	3 4 4 1 7 1 1 1 1 1 1	Hent (IDEM), Office of Land Qua	nty.
Type of Inspection (may include more th	an one):		
Routine Compliance Evaluation Follow Up Inspection Compliance Assistance Inspection	☐ Complaint ☐ Multi-Media Screening Evalu ☐ Other:	uation	
Inspection Findings: These findings are considered preliminary a designated agent of IDEM believes may b	nd identify specific complia e a violation of a statute(s),	nce issues discovered during the ab rule(s) or permit(s) issued by IDEM	nove-noted inspection that the M.
□ No violations were discovered with resp □ Violations were discovered but correcte □ Violations were discovered and require □ Violations were discovered and may su □ Additional information/review is require □ Other/Comments (attachment may be incompared)	d during the inspection. a submittal from you and/o bject you to an appropriate ed to evaluate overall comp	or follow-up inspection by IDEM.	
********	*** *** *** *** ***	*********	*******
Confidential Information In accordance with 329 IAC 6.1 (http://www.department for which confidential treatment information. A person may request confidential the department, such as inspections. The way for accurate identification of the information must be submitted to the common confidential is acquired by the department information and the supporting information identify all confidential claim materials. Concarts, photographs, or samples (see definal alleged information acquired during this in the "does" box is not a written claim for the "does" box is not a written	ent is requested shall make a cential treatment of informat written claim for confidential ion claimed to be confidential ion claimed to be confidential insisted in the claim applies on the claim applies on fidential information maition of information at 329 aspection does does not of the inspection was precific matters discovered during the department. The report does	a written claim of confidentiality a zion at the time the information is a ltreatment may be broad, but mustial. In accordance with 329 IAC 6 orking days from the time the inform of confidentiality shall designates in a manner that is sufficiently clay include (but is not limited to) write AC 6.1-2-8). The undersigned Oxoes not (check one) contain confinformation acquired during this in crovided to the undersigned Owner/ag the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the inspection that the IDEM regime of the contain confining the contain confining the inspection that the IDEM regime of the contain confining the contain contain contain confining the contain	at the time of submittal of the acquired through the actions of st be sufficiently clear to allow 5.1-4-1(d), supporting rmation claimed as te and segregate the lear to allow the department to itten or printed material, maps, where Representative has fidential information. A check aspection. Agent at the conclusion of the presentative believes may be a
ract that indicates an intentional, a knowl	ng, or a reckless violation.		
IDEM Representative: MATTHEW PETERSCHMI Printed Name 219-7-1-1011 Phone Number	Signature MPETERSCE Email	1DEM. IN, 605	Date 756 / 9! 95
Owner/Representative:			
Emma Ter Beck Printed Name	Emra Ja	Buk	Engineer Title
<u>U14-914-4361</u> Phone Number	emma. terbec	ck@arcadis.com	6/25/2624 Date
IDEM prefers to email your report. Please c	heck this box to indicate you	prefer to receive a copy of the insp	ection report via U.S. mail: