



Quarterly Technical Progress Report April 2015 – June 2015

RCRA Corrective Action - IND 980 700 801

2915 Dr. Martin Luther King Jr. Boulevard, Anderson, IN

Revitalizing Auto Communities Environmental Response Trust

Indiana Department of Environmental Management

6520 Corporate Drive Indianapolis Indiana 46278

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Appendix A Fact Sheet 19 – July 2015

1. Introduction

GHD, on behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust, has prepared this Quarterly Technical Progress Report for the RACER Trust facility located at 2915 Dr. Martin Luther King Junior Boulevard in Anderson, Indiana (Facility or Site).

This Quarterly Technical Progress Report has been prepared to summarize activities related to the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI), Interim Measures (IM) activities, and Corrective Measures (CM) at the Facility for the period of April through June 2015.

2. Summary of RFI, Interim Measures, and Corrective Measures Activities

2.1 RCRA Facility Investigation/Environmental Indicators Determination

There were no RFI activities conducted during this reporting period.

RFI activities are 100-percent complete.

2.2 Interim Measures

Interim measures being conducted at the Site consist of routine groundwater and surface water monitoring and related reporting in accordance with the Site-wide Groundwater Monitoring Plan (AECOM, 2010) and subsequent recommendations made in the 2011-2014 Annual Groundwater Monitoring Reports.

Semi-annual groundwater and routine surface water monitoring was conducted between April 27 and April 29, 2015.

Interim measures are ongoing.

2.3 Corrective Measures

Corrective Measures activities conducted during this reporting period included preparation of Environmental Restrictive Covenants (ERCs). The purpose of the ERCs is to ensure residual contamination at the Site does not pose an unacceptable risk to future on-Site receptors.

The South Court Soil Investigation and Wastewater Treatment Plant (WWTP) Plume Boundary Well Installation Work Plan (CRA, November 14, 2014) was implemented between November 19 and 24, 2014. The objectives of the soil investigation and well installation was to document the current soil quality within the South Court Area to determine if soils are acting as an ongoing source to groundwater impacts and to monitor the WWTP volatile organic compound (VOC) groundwater plume stability beneath the Meadowbrook Golf Course, respectively. The results were reported to IDEM on June 4, 2015 in the South Court Soil and WWTP Plume Boundary Investigation Report of Findings and a summary of the findings from the investigation is provided in Section 3.0.

3. Summary of Findings

3.1 RCRA Facility Investigation/Environmental Indicators Determination

There were no RFI activities conducted during this reporting period.

3.2 Interim Measures

Between April 27 and April 29, 2015, semi-annual groundwater and routine surface water monitoring was completed. The field data, validated analytical data and discussion of results will be provided to IDEM in the 2015 Annual Groundwater Monitoring Program Report.

3.3 Corrective Measures

The objective of the scope of work related to the WWTP VOC plume was to install an additional plume boundary well south of the irrigation pond on the Meadowbrook Golf Course to monitor WWTP VOC plume stability beneath the Golf Course, the results of which indicate the WWTP plume is fully delineated to the south of the irrigation pond.

The objective of the proposed scope of work related to the South Court Area VOC plume was to document the quality of and to assess whether the South Court Area soils have the potential to act as an ongoing source of groundwater VOC impairment. The results of the soil sampling indicate elevated concentrations of trichloroethene (TCE) and other chlorinated VOCs remain in soil beneath the South Court and, in general, the concentrations have not decreased since the 2000 and 2004 investigations in the same area. Further, it is possible that in-situ soils exposed to precipitation may have the potential to act as a source to groundwater impairment. An assessment of the concentration and/or mass of total chlorinated VOCs in the groundwater over time is proposed as a reasonable next step in developing another line of evidence related to the potential for soils to act as an ongoing source to groundwater impairment. This will be done as a component of the pending Corrective Measures Proposal.

4. Summary of Changes to RFI, Interim and/or Corrective Measures

There were no changes to the RFI, Interim Measures and/or Corrective Measures during the reporting period.

5. Summary of Contacts with Representatives of Local Community, Public Interest Groups, or State Government

On April 1, 2015, IDEM approved the ERC for Tract A.

The ERC for Tract B (North) was executed on April 1, 2015 and recorded in the office of the recorder of Madison County on April 2, 2015.

On April 1, 2015 Tract B (North) was sold to GDI Construction.

On May 19, 2015 IDEM issued a Notice of Corrective Action Compete with Controls letter detailing IDEM's Final Decision that RACER Trust's Tract B (North) Area has fulfilled its obligations under Indiana's RCRA Corrective Action Program.

On May 7, 2015, IDEM provided comments on the WWTP Groundwater Investigation Report (IDEM, May 7, 2015). On June 6, 2015, on behalf of RACER Trust, CRA submitted a draft response to IDEM's May 7, 2015 comments. On June 9, 2015, IDEM provided further comments. RACER Trust's responses to the comments are pending.

On May 28, 2015, IDEM approved the ERCs for Tracts C to F, and Crawford Field.

A technical memorandum was prepared summarizing the sources of the imported fill used during the City's "Beautification" of a section of the Lot 3 Parking Lot. The technical memorandum was prepared and submitted to IDEM on June 1, 2015 and IDEM concurred that the imported fill does not require characterization by analysis.

6. Summary of Problems or Potential Problems

No problems were encountered during this reporting period.

7. Actions Taken To Rectify Problems

No problems were encountered during this reporting period.

8. Changes in Personnel

In July 2014 Conestoga-Rovers & Associates (CRA) merged with GHD and joined the GHD family of companies. Effective July 1, 2015 CRA officially change its name to GHD.

9. Projected Work for July through September 2015

Projected work for July through September 2015 includes the following:

- July surface water sampling event
- Supplemental analysis in support of the preparation of the draft Corrective Measures Proposal
- Residential well sampling and reporting
- Decommissioning and replacement of monitoring well MW 97-14
- Finalize the remaining draft Environmental Restrictive Covenants for the Site

10. Reports and Data

The Quarterly Technical Progress Report, January 2015 through March 2015, was submitted to IDEM on April 28, 2015.

The South Court Soil and WWTP Plume Boundary Investigation Report of Findings was submitted to IDEM on June 4, 2015.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 19 (July 2015) submitted with this Quarterly Technical Progress Report as Appendix A.

Appendices

Appendix A

Fact Sheet 19 – July 2015



Revitalizing Auto Communities Environmental Response Trust

Project Fact Sheet 19 | July 2015 | www.racertrust.org

RCRA CORRECTIVE ACTION REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST

2915 Dr. Martin Luther King Jr. Boulevard (Formerly Pendleton Ave.) Anderson, Indiana

INTRODUCTION

The Revitalizing Auto Communities Environmental Response (RACER) Trust has prepared this Project Fact Sheet to update the local community about environmental activities being conducted at the facility located at 2915 Dr. Martin Luther King Jr. Boulevard (formerly Pendleton Avenue), Anderson, Indiana (Site). These activities are conducted under the oversight of the Indiana Department of Environmental Management (IDEM) and in accordance with an Agreed Order issued for the Site.

The Corrective Action process includes a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of the soil and groundwater conditions at the Site. Based upon an evaluation of the results obtained during these investigations, appropriate corrective measures will be proposed and implemented.

SITE BACKGROUND

The Site is located on the southwest side of Anderson in Madison County, Indiana. Formerly, the facility comprised approximately 3,000,000 square feet of manufacturing area situated on 234 acres. GM operations at the Site began in 1929. Additional plant buildings were constructed and the plants were expanded several times between 1937 and 1989. Demolition of the plant commenced in 2007. Demolition of the main plant buildings and restoration activities were completed in 2009.

As a result of General Motors Corporation's (GMC's) 2009 bankruptcy, certain operating assets of GMC were sold on July 10, 2009 to a newly formed company known as General Motors LLC. Existing non-continuing assets, including the Site, became the property of Motors Liquidation Company (MLC), in its capacity as debtor-in-possession in the bankruptcy case. In October 2010, the United States Government announced that MLC had agreed to resolve its liabilities at 89 sites relating to liabilities under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), RCRA, and the Clean Air Act through an environmental response trust fund. On March 31, 2011, the RACER Trust became effective and will conduct, manage, and fund cleanup at the 89 sites formerly owned by MLC, including the Site.



PROJECT FACT SHEET

Key documents that have been submitted to U.S. EPA and IDEM and are available for review in the public repository.

The following documents have been submitted since 2006:

- Interim Measure Work Plan - Production Well Abandonment, July 27, 2006
- Response to IDEM's Comments on Final RFI Report, April 5, 2007
- Revised Final RFI Report and Response to IDEM's Comments, September 27, 2007
- Production Well Abandonment Memo, November 16, 2007
- Corrective Measures Plan, March 31, 2008
- Site-Wide Groundwater Monitoring Plan, March 31, 2008
- Notification to IDEM of a new potential contaminant source area, September 5, 2008
- Progress Reports from 1998 to present
- Annual Groundwater Monitoring Reports for 2006 to 2014
- Vapor Intrusion Study Work Plan, July 2010
- Residential Vapor Intrusion Assessment Work Plan, September 1, 2011
- Investigation Work Plan, September 2, 2011
- Vapor Intrusion Study Work Plan Implementation – Technical Memorandum, November 3, 2011
- Residential Vapor Intrusion Assessment Technical Memorandum, March 7, 2012
- Supplemental RFI Results Technical Memorandum, March 7, 2012
- Soil and Perched Groundwater Delineation Work Plan, June 26, 2012
- Wastewater Treatment Plant Source Area Investigation Work Plan, January 4, 2013
- Perched Groundwater Investigation Work Plan, April 3, 2013
- Revised Risk Assessment Approach Letter, April 26, 2013
- Wastewater Treatment Plant Source Area Investigation Technical Memorandum, July 31, 2013
- Revised Risk Assessment Interim Deliverable, August 9, 2013
- Wastewater Treatment Plant Groundwater Investigation Work Plan, September 27, 2013
- Refined Human Health Risk Assessment and Derivation of Site-Specific Risk-Based Screening Levels, October 2013
- Refined Human Health Risk Assessment - Addendum, May 12, 2014
- Perched Groundwater Investigation Report of Findings, May 12, 2014
- RFI Final Report, June 2014
- Residential Well Sampling Work Plan, October 23, 2014
- Revised South Court Soil Investigation and WWTP Plume Boundary Well Installation Work Plan, November 14, 2014
- Wastewater Treatment Plant Groundwater Investigation Report of Findings, March 26, 2015
- City Beautification of Anderson Parking Lot Memorandum, June 1, 2015
- South Court Soil and WWTP Plume Boundary Investigation Report of Findings, June 4, 2015

RCRA CORRECTIVE ACTION

The RACER Trust is currently conducting Corrective Action activities at the Site. Corrective Action activities are required for all facilities that applied for a permit to store hazardous waste and include an evaluation of whether plant waste management operations have impacted the environment. The program includes a RFI that is designed to identify and address any significant risks to human health or the environment resulting from the release of hazardous waste or hazardous constituents to environmental media such as soil or groundwater. The scope of the RFI and required cleanup work has been and will continue to be reviewed with IDEM. The activities will be conducted according to standards that are protective of human health and the environment.

The Corrective Action process uses Environmental Indicators (EIs) to evaluate and report on current site conditions related to potential current human exposure and potential groundwater migration. Under the RCRA program, U.S. EPA's top priority is to make sure that these two Environmental Indicators are satisfied at a given site. MLC submitted reports to IDEM for the two Environmental Indicators to demonstrate that current human exposure and migration of contaminated groundwater are under control. Groundwater monitoring to verify plume stability is ongoing.

RCRA FACILITY INVESTIGATION

RFI activities have been completed at the Site. The purpose of an RFI is to investigate any areas of the Site that may need further action and to determine what additional steps might be appropriate. The results of these investigations, including an assessment of potential risk, were documented in reports that have been submitted to IDEM and copies are available for review in the IDEM's virtual file cabinet. A revised Final RFI Report (Conestoga-Rovers & Associates, June 2014) was submitted to IDEM providing details of historical investigations summarized in the previous Final RFI Reports and is amended with details of investigations conducted since that time. The revised and Final RFI Report was approved by IDEM on July 22, 2014.

A Refined Human Health Risk Assessment was prepared to assess the results of investigations conducted to date to determine whether realistic exposure levels of Site constituents have the potential to adversely affect human health on- or off-Site. This report was submitted to IDEM in October 2013 and approved with the exception of the non-default residential and commercial/industrial vapor intrusion groundwater screening levels in November 2013.

On May 12, 2014 an Addendum to the Refined Human Health Risk Assessment was submitted to IDEM detailing that RACER Trust agreed to use IDEM's Remediation Closure Guide generic residential and commercial/industrial groundwater vapor exposure screening levels. The Refined Human Health Risk Assessment, coupled with the Addendum, was approved by IDEM on May 19, 2014.

RFI activities are 100-percent complete.

COMPLETED INTERIM MEASURES

Interim Measures (IM) were conducted in the South Court Area in July 2005 to address concentrations of trichloroethene (TCE) in a small area of soil and shallow groundwater that were significantly higher than in the surrounding area.

Soil was excavated to the depth of the perched water table at approximately 8 feet below ground and disposed off-site. Hydrogen-Releasing Compound® (HRC) was mixed into soil at the bottom of the excavation, to enhance degradation of TCE in groundwater. Following placement of the HRC®, the excavation was backfilled and the pavement replaced.

Interim measures were also conducted in 2007 to plug and abandon five former groundwater production wells at the facility. This work was performed according to Indiana Department of Natural Resources guidelines.

The RACER Trust continues to complete interim Site-wide groundwater monitoring in accordance with the Site-wide Groundwater Monitoring Plan.

CORRECTIVE MEASURES

A draft Corrective Measures Proposal was submitted to IDEM in March 2008. A revised corrective measures proposal will be prepared as necessary incorporating the results of activities completed since the time the initial proposal was submitted, including a revised Human Health Risk Assessment and additional investigations. Environmental Restrictive Covenants for Tract A, Tract B (North), Tracts C to F, and Crawford Field have been completed and approved by IDEM.

UPCOMING ACTIVITIES

Routine groundwater and surface water monitoring and reporting is ongoing. Remaining Environmental Restrictive Covenants for the Site will be finalized. Residential tap sampling and reporting may be completed. A revised Corrective Measures Proposal will be developed.

PUBLIC PARTICIPATION

An information repository has been established where current project related documents are available for public review. The information repository is located at:

Anderson Public Library
111 East 12th Street

Anderson, IN 46016
Tel: (765) 641-2450

Project Fact Sheets will be issued periodically during the implementation of the Corrective Action program to keep the community informed of ongoing activities at the Site.

CONTACT INFORMATION

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