REPORT ON
ASTM PHASE I ENVIRONMENTAL SITE ASSESSMENT
340 WHITE RIVER PARKWAY, WEST DRIVE SOUTH 50
INDIANAPOLIS, INDIANA

by

Haley & Aldrich, Inc.
Cleveland, Ohio

for

Motors Liquidation Company
Detroit, Michigan

File No. 37092-000
30 April 2010

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30 April 2010
File No. 37092-000

Motors Liquidation Company
500 Renaissance Center, Suite 1400
Detroit, Michigan 48243

Attention: Matthew Roling

Subject: Executive Summary - Environmental Site Assessment
Indianapolis Metal Center
340 White River Parkway, West Drive South 50
Indianapolis, Indiana

Dear Mr. Roling:

Please find the attached Phase I environmental site assessment (Phase I assessment) being conducted at the above-referenced property (hereafter referred to as the "subject site"). This work was performed by Haley & Aldrich, Inc. (Haley & Aldrich), in accordance with Motors Liquidation Company authorization to proceed dated 13 April 2010 and our proposal dated 21 April 2010. As indicated in our proposal, this Phase I assessment was conducted using practices consistent with the American Society of Testing and Materials (ASTM) E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527-05 Standard) as referenced in 40 Code of Federal Regulations (CFR) Part 312 (the All Appropriate Inquiries [AAI] Rule).

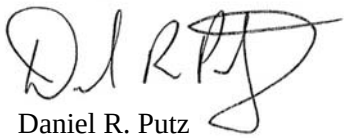
The objective of a Phase I assessment is to identify known and suspect "recognized environmental conditions" (RECs), historical RECs (HRECs), and *de minimis* conditions associated with the subject site, as defined in the ASTM E 1527-05 Standard, by evaluating site history, existing observable conditions, current site use, and current and former uses of adjoining properties as well as potential releases at surrounding properties that may impact the subject site.

Our conclusions regarding the presence and potential impact of RECs on the subject site are intended to help the user evaluate the "business environmental risk" associated with the site, as defined in the ASTM E 1527-05 Standard.

Thank you for the opportunity to perform these services for you. We intend to provide a full report of the Phase I assessment at a later date. Please do not hesitate to contact us if you have any questions or comments.

Sincerely yours,
HALEY & ALDRICH, INC.

Dennis J. Kreitzburg
Senior Environmental Geologist



Daniel R. Putz
Project Manager

David J. Hagen
Senior Vice President

Enclosures

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REPORT ON
ASTM PHASE I ENVIRONMENTAL SITE ASSESSMENT
Indianapolis Metal Center
340 White River Parkway, West Drive South 50
Indianapolis, Indiana

by

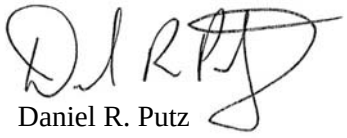
Haley & Aldrich, Inc.
Cleveland, Ohio

The undersigned declare the following:

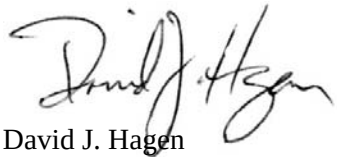
We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 40 CFR Part 312, §312.10.

We have the specific qualifications based on education, training, and experience to assess the nature, history, and setting of the subject site and "develop opinions and conclusions regarding conditions indicative of releases or threatened releases." We have developed and performed the "all appropriate inquiries" (AAI) in conformance with the standards and practices set forth in 40 CFR Part 312.

Dennis J. Kreitzburg
Senior Environmental Geologist



Daniel R. Putz
Project Manager



David J. Hagen
Senior Vice President

for

Motors Liquidation Company
500 Renaissance Center, Suite 1400
Detroit, Michigan 48243

File No. 37092-000
April 2010

EXECUTIVE SUMMARY
Indianapolis Metal Center
340 White River Parkway, West Drive South 50
Indianapolis, Indiana
File No. 37092-000
30 April 2010

Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this Phase I environmental site assessment (Phase I assessment) of the subject site. The work was performed by Haley & Aldrich in accordance with Motors Liquidation Company authorization to proceed dated 13 April 2010 and our proposal dated 21 April 2010. As indicated in our proposal, this Phase I assessment was performed in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527-05 Standard) as referenced in 40 Code of Federal Regulations (CFR) Part 312 [the All Appropriate Inquiries (AAI) Rule]. Deviations from this Standard, and/or data gaps and their significance are described herein. Our conclusions are intended to help the user evaluate the "business environmental risk" associated with the subject site, as defined in the ASTM E 1527-05 Standard.

The subject site is an approximate 102-acre property currently developed for industrial use with more than 2 million square feet of building under roof. The subject site was first developed in the late 1800's and early 1900's as a woodworking facility that made carriages. The subject site was converted to a metal working operation making complete automobiles before it was acquired by General Motors (GM) in 1936 and since that time has produced metal stamped automotive parts. Sub-assembly that consisted of welding or gluing stamped metal parts together or welding small fixtures to stamped parts has also taken place at the subject site. From 1972 to 1987 parts washing and painting was also performed at the subject site.

The subject site applied for a RCRA Part A permit in 1980 and had a single Hazardous Waste Management Unit (HWMU). In 1991, the HWMU was closed in accordance with applicable regulations and was converted to a less than 90-day Container Storage Area. The subject site recently changed from large quantity generator status to small quantity generator status.

The subject site is located approximately 500 feet west of the White River on a sand and gravel glacial outwash deposit. Building basements intersect the groundwater table. Approximately seven (7) groundwater dewatering wells/pumps are located around the perimeter of the basement areas. These pumps collect groundwater from outside the basement areas and discharge the water to the White River. Within the basement areas numerous sumps collect oil and groundwater which are either pumped to an oil/water separator or are discharged directly to a collection tank. Oil and water from these systems are shipped off-site for treatment and disposal. Although general groundwater flow in the area is likely east toward the White River, due to the dewatering activities and the presence of a dam on the White River, the subject site may actually be downgradient of surrounding areas.

The objective of a Phase I assessment is to identify known and suspect "recognized environmental conditions" (RECs), historical RECs (HRECs), and *de minimis* conditions associated with the subject site, as defined in the ASTM E 1527-05 Standard.

The ASTM E 1527-05 Standard requires an environmental professional's opinion of the potential impacts of RECs, HRECs, and *de minimis* conditions identified on a site during a Phase I assessment. Our opinion is rendered with respect to an REC's potential (high, medium, or low) to require remedial

response based on prevailing agency requirements and on our understanding of Motors Liquidation Company's intended use for the subject site. We do not know the further intended use of the subject site. The current use of the subject site remains industrial. Our opinion regarding an REC's potential impact on the subject site (high, medium, low, or unknown) is based on the scope of our work, the information obtained during the course of our work, the conditions prevailing at the time our work was performed, the applicable regulatory requirements in effect at the time our work was performed, and/or our experience evaluating similar sites, and on our understanding of the client's intended use for the subject site.

Data gaps exist in the scope of work for this Phase I ESA. We have not received responses to our FOIA requests from the U.S.EPA and the IDEM. If, when received, findings from FOIA requests change our opinion regarding RECs at the subject site, we will notify you.

Based on the results of this Phase I Environmental Site Assessment, our findings are as follows:

KNOWN OR SUSPECT RECOGNIZED ENVIRONMENTAL CONDITIONS

The ASTM E 1527-05 Standard defines an REC as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." A material threat is defined by the ASTM E 1527-05 Standard as "a physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the environmental professional, is threatening and might result in impact to public health or the environment." Consistent with ASTM E 1527-05 Section 12.5 (Report Format), and for the purposes of this assessment, those RECs that have been identified as being present with respect to the subject site are referred to as Known Recognized Environmental Conditions (KRECs), and those RECs that have been identified as being likely present with respect to the subject site are referred to as Suspect Recognized Environmental Conditions (SRECs).

This Phase I assessment has revealed evidence of fourteen KRECs or SRECs in connection with the subject site.

Our opinion of the potential impacts of the REC(s) identified in this Phase I assessment is as follows:

Known Recognized Environmental Conditions

KREC #1: AOC A - Former Plant No. 5 Underground Storage Tanks
Potential Impact: Medium
Explanation: The Ulrich Chemical property was purchased by GM in 1982 and that property is now known as former Plant No. 5. The United States Environmental Protection Agencies (USEPAs) Preliminary Assessment/Visual Inspection (PA/VSI) for the Ulrich facility (Ulrich PA/VSI) states the dates of operation of the TCA Tank from 1973 to 1982 and the fuel USTs from 1968 to 1982. Based on IDEM Initial Incident Report in Nov 1986, the gasoline tanks were installed around 1954. Based on UST Notification, 10,000-gallon 1,1,1-TCA tank (1977), 10,000-gallon diesel tank (1976), 10,000-gallon gasoline tank (1978) and 6,000-gallon gasoline tank (1971). Four Underground Storage Tanks (USTs) containing leaded and unleaded gasoline, diesel fuel and 1,1,1-trichloroethane were located on the property at the time of purchase. A 200,000-gallon neutralization tank and a hazardous waste storage area were also located in this area. These USTs were identified in the Ulrich PA/VSI report as Area of Concern A (AOC A). According to the Ulrich PA/VSI, GMC removed the USTs in 1986 and surface soil that was excavated to remove the tanks "showed the possibility of contamination". Based on the findings of this assessment, the possible soil and groundwater impacts have not been investigated.

KREC #2: AOC C - West Gate Spill Area
Potential Impact: Low
Explanation: On 11 June 1986, a 500-gallon gasoline above-ground storage tank was displaced from its moorings and its contents were released to the surrounding soil. Gasoline reportedly made its way into a storm drain along Division Street and some contaminated soil was excavated and disposed off-site. This area is identified in the PA/VSI for the GM stamping facility (GM PA/VSI) as AOC C. Based on our findings to date, the possible soil and groundwater impacts have not been investigated.

KREC #3: Paint Mix-Oil Stores Area
Potential Impact: Medium
Explanation: The following potential releases were identified in this area:

- AOC E (Oil/Water Mixing Tank Spill Area) – The GM PA/VSI identified an approximate 10,000-gallon release of an oil-water mixture on July 11, 1978 as AOC E. The GM PA/VSI also reported that 100 gallons migrated to the storm water sewer system and 2,000 gallons of the mixture were recovered and sent off-site for disposal. The GM PA/VSI also reported that this area "has a history of minor releases". This area also contains the Former Interim Status Container Storage Area (SWMU 1 in the GM PA/VSI) though no releases have been associated directly to SWMU 1.
- Fuel Oil Tanks – Sanborn maps from 1966 and 1968 show three fuel oil tanks adjacent to, and east of, the former powerhouse. Other than the Sanborn Maps, no information on the tanks (including their capacity, whether they were above- or below-ground, etc.) was found during our assessment. Additionally, at this same location the 1950 and 1956 Sanborn maps show an apparent tank with an undecernable label at the same location of the three fuel oil tanks.
- Ash Slurry UST #8 (SWMU 10) – Facility documents indicate regulated UST #8 was located north of the east end of the former powerhouse. The facility documents indicate the concrete tank had a capacity of 6,000 gallons and was installed in 1956. The facility documents indicate the tank was last used in 1980, and was filled with inert material. Further documentation indicated the tank area was scheduled for soil testing, although no documentation of soil sampling was located.
- Compressor room basement – At the time of our site visit several small oil leaks were observed in the compressor room basement. Though the observable leaks were minor in nature, the two sumps located in the basement may have provided a preferential pathway for oils to migrate to soil or groundwater.

Based on our findings to date, the possible soil and groundwater impacts have not been investigated.

KREC #4: Stamping Operations
Potential Impact: Medium
Explanation: Lubricating oils and hydraulic oils were observed on soil around the Baler Building, on floors, walls and in sumps around the metal stamping presses and associated equipment (including hydraulic compressors and chip handling equipment). This area includes the Free Oil Treatment System (SWMU 6), the Free and Soluble Oil Storage Tanks (SWMU 8) and the Basement Floor Sumps (SWMU 24) identified in the GM PA/VSI. The presence of these oils on floors, walls and in groundwater control sumps indicates a potential release to soil and groundwater. This area covers a large portion of the building area on the subject site. The basement floor sumps are distributed throughout the basements and are connected via piping under the slab.

Oil staining was observed around the chip handling equipment in the Baler Building. A waste oil collection sump is currently located in the Baler Building. The integrity of the sump was not able to be determined. Facility documentation and the GM PA/VSI indicate up to two waste oil collection tanks have historically been present in the Baler Building. Facility personnel report that IDEM indicated no further action was necessary for at least one UST. A facility document indicates a possible second UST is

located in the area. This second UST may actually be referring to the current waste oil sump in the Baler Building. In either case, the presence of the current sump and the stained soil indicate a potential release to subject site groundwater and/or soils. Although some investigations have been performed around the Baler Building to delineate impacts of oil, the continued presence of free oil on the ground indicate a continued release.

KREC #5: Building 32 Area Waste Handling Operations and USTs
Potential Impact: Medium
Explanation: The Former CPI Waste Oil Underground Storage Tank (SWMU 4), the Former Rubbish Dock Waste Oil Tank (SWMU 7), the Floor Cleaning Water Holding Tank (SWMU 11), the Waste Treated Pine Floor Block Storage Area (SWMU 18), the Scrap Metal Storage Pit (SWMU 19), the Empty Drum Storage Areas (SWMU 17), current and former trash compactors and scrap metal bins, and dock leveling hydraulic equipment have been, or are currently, located in this area. Information obtained from IDEM indicates that the two former USTs in this area were issued No Further Action letters. Minor leaks and staining was observed around the hydraulic dock leveling equipment, trash compacting equipment and chip collection equipment. The GM PA/VSI reported that the Waste Treated Pine Floor Block Storage Area was located outside on pavement and the investigators observed extensive staining associated with this area (at the time of the GM PA/VSI). No documentation of sampling or remediation activities has been located for this area. Waste floor block is currently stored in the pipe fittings storage building in steel bins. The GM PA/VSI also identified oily residue under the Empty Drum Storage Areas. Facility documentation reports a spill of 340 gallons of oil in this area. A photograph provided with the GM PA/VSI report shows oil along a plant wall and in a storm drain. Although some investigations have been performed around former USTs, based on our findings to date, the possible soil and groundwater impacts have not been fully investigated.

KREC #6: Storm and Waste Water Treatment Facilities and Fuel Oil USTs
Potential Impact: Medium
Explanation: The Industrial Wastewater Treatment Facility (IWTF) (SWMU 14), the Storm Water Treatment Facility (SWTF) (SWMU 15) and two 30,000-gallon fuel oil USTs have been located in this area. Only the SWTF exists today and is operational. According to the GM PA/VSI the IWTF was operational from 1984 to 1988. It received wastewater from the ELPO painting process, the parts washing system and other sources. The system consisted of two 350,000-gallon batch tanks, one 50,000 sludge storage tank, a filter press, a filter cake roll-off between the tanks, and a sump. The sump collected excess water from the filter press operation. No assessment of the integrity of the storage components of this process has been made.

The SWTF consists of a 350,000-gallon clarifier tank for skimming used oil and floatables. The oil and other "floatables" are stored in a 6,000-gallon underground concrete tank. Heavier-than-water particulates settle to the bottom of the tank and are pumped to the storm water sludge tank. This process has been in operation since 1969. No assessment of the integrity of the storage components of this process has been made.

Facility documents indicate that the two fuel oil tanks were removed in 1987. We have not been provided with documentation of tank removal, closure activities, or IDEM status from the facility or IDEM.

KREC #7: Closed in Place Fuel Oil UST
Potential Impact: Medium
Explanation: An 8,000-gallon fuel oil UST was closed in place in 1990. TPH (1,876 ppm) was detected in a soil sample adjacent to the UST. A report submitted to IDEM indicated that bioremediation would be used to address the impacted soil; however, no further information was provided by the facility or IDEM regarding this UST.

KREC #8: Former Meuhlstien Property
Potential Impact: Medium
Explanation: The former Meuhlstien property is located on the northeast corner of Division Street and Gillette Street. This property was acquired by GMC between 1993 and 1997. The Meuhlstien property is first shown on Sanborn maps as being occupied by the National Wheel Company, a woodworking shop in 1898. In 1915 the National Wheel buildings are shown as vacant. The 1950, 1956, 1966 and 1988 Sanborn maps show the property as being a Reclaimed Rubber Processing Plant. We reviewed a draft Phase III remedial investigation report which indicated impacts from multiple compounds across this area. The impacts were from site operations and from 2 USTs on the property. We did not find a final report documenting remediation of the impacts.

Suspect Recognized Environmental Conditions

SREC #1: AOC D ((West Pump House Spill Area) and UST #16
Potential Impact: Low
Explanation: On 14 January 1988, approximately 20 gallons of diesel fuel was spilled onto soil due to overfilling of a UST near the fire protection pump house. Soil and gravel was excavated at the time of the release. Documentation of delineation of possible soil and groundwater impacts has not been located. UST #16 is a 4,000-gallon diesel fuel tank which was removed in 1988. We did not find documentation of tank removal, closure activities, or IDEM status.

SREC #2: Building 14 Area
Potential Impact: Low
Explanation: SWMUs 12 (the ELPO Paint System Waste Pit), SWMU 13 (the Former Chromic Acid Treatment Tank), and UST #11 were previously located in this area. An oil/water separator and a trench drain were observed in the executive car garage at the time of our site visit. Although there are no known releases in this area, several conditions have been identified that may have lead to a release to the environment. SWMU 12 (the ELPO Paint System Waste Pit), SWMU 13 (the Former Chromic Acid Treatment Tank), and UST #11 (a 120,000-gallon ELPO spill reservoir), all handled waste below grade and the below grade structures that handled these materials were not inspected at the time of their removal to determine the integrity of the structures. The oil/water separator and the trench drain in the executive car garage have not been assessed as to system integrity. No soil or groundwater sampling data has been located for these areas.

SREC #3: USTs 4 and 5
Potential Impact: Low
Explanation: Facility documents indicate a 10,000-gallon diesel fuel UST and an 8,000-gallon leaded gasoline UST south of the southwest corner of the main production building. Facility reports indicate that both were removed in December 1992 by Dennistar (both installed in 1974), and that nine samples were collected for TPH and results indicate concentrations were less than 10 ppm. We did not find documentation of tank removal, closure activities, or IDEM status.

SREC #4: Building 31 Area
Potential Impact: Medium
Explanation: The Standard Oil Company of Indiana is shown on this parcel on Sanborn maps dated 1950, 1956, 1966, and 1968. The operations shown were consistent throughout each of the maps. Oil transfer operations are shown with an oil warehouse, a barrel filling room, a barrel paint room, a warehouse, a pump room, and a pump shed. A five-foot concrete wall is shown on the eastern end of this facility near the pump shed. This wall enclosed an area that we observed on aerial photographs as an area of possible distressed soil. The use of this area is unknown.

During our site visit we observed trench drains and collection sump in the battery re-charge area and hydraulic dock leveling equipment. The condition of the sump and the hydraulic equipment could not be determined.

SREC #5: Surrounding Properties
Potential Impact: Low
Explanation: Much of the surrounding area may be upgradient with respect to groundwater flow because the subject site is between them and the White River and pumping operations on the subject site to control groundwater in basements. The surrounding area is predominated by commercial (i.e. dry cleaners, gas stations, automotive repair facilities) and industrial (i.e. oil refinery, tannery, scrap and salvage operations) sites that may have an impact on the subject site.

SREC #6: Storm Water Sewer System and Retention Basin
Potential Impact: Low
Explanation: The Storm Water Sewer System (SWMU 23) and Retention Basin (SWMU 16) have been identified as receiving several releases throughout the history of the operations including oil, oily water and gasoline. Because the integrity of these sewers is unknown, the storm water sewers may have released contaminants to subject site soils and/or groundwater.

HISTORICAL RECs

The ASTM E 1527-05 Standard defines an HREC as an environmental condition "which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently."

This Phase I assessment has revealed evidence of two HRECs in connection with the subject site.

HREC #1: AOC B – Pipe Fitting Storage Building Spill Area
Potential Impact: Low
Explanation: During a compliance inspection conducted in November 1986, an oily residue was discovered near the pipe fittings storage building next to the north side of the railroad tracks. Soil samples collected of the stained area did not show elevated levels of lead, cadmium or chromium. This area was identified in the GM PA/VSI as AOC B. At the time of the GM PA/VSI, no evidence of the oily residue was present. The GM PA/VSI recommended no further action for this area.

HREC #2: Executive Car Garage UST
Potential Impact: Low
Explanation: A 10,000-gallon gasoline UST located outside the executive car garage was removed in 2002. A letter from IDEM indicates no further action is required regarding this UST.

DE MINIMIS CONDITIONS

The ASTM E 1527-05 Standard defines *de minimis* conditions as those conditions which "do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." The ASTM E 1527-05 Standard notes that "conditions determined to be *de minimis* are not recognized environmental conditions."

This Phase I assessment has revealed no evidence of *de minimis* conditions in connection with the subject site except for the following:

Numerous small stains were observed in areas not identified above. These stains were generally from automobiles in parking areas, oil drips from miscellaneous equipment or from unknown sources and were determined to not be a likely source of action from a regulatory agency or that they would be a risk to human health or the environment.

SUMMARY AND RECOMMENDATIONS

In summary, several RECs were identified during this Phase I assessment for which additional investigation would be necessary to further define the business environmental risk associated with this property. These investigations would include but would not be limited to soil and groundwater sampling.

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1 INTRODUCTION

1.1 Objective

The objective of a Phase I assessment is to identify known and suspect "recognized environmental conditions" (RECs), historical RECs (HRECs), and *de minimis* conditions associated with the subject site by evaluating site history, existing observable conditions, current site use, and current and former uses of adjoining properties as well as potential releases at surrounding properties that may impact the subject site. RECs are defined in the ASTM E 1527-05 Standard as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water at the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." A material threat is defined by the ASTM E 1527-05 Standard as "a physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the environmental professional, is threatening and might result in impact to public health or the environment."

Consistent with ASTM E 1527-05 Section 12.5 (Report Format), and for the purposes of this assessment, those RECs that have been identified as being present with respect to the subject site are referred to as Known Recognized Environmental Conditions (KRECs), and those RECs that have been identified as being likely present with respect to the subject site are referred to as Suspect Recognized Environmental Conditions (SRECs). The ASTM E 1527-05 Standard defines HRECs as environmental conditions "which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently."

Our conclusions are intended to help the user evaluate the "business environmental risk" associated with the subject site, defined in the ASTM E 1527-05 Standard as "a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice. Consideration of business environmental risk issues may involve addressing one or more non-scope considerations..."

The completion of this Phase I assessment is only one component of the process required to satisfy the AAI Rule. In addition, the user must adhere to a set of user responsibilities as defined by the ASTM E 1527-05 Standard and the AAI Rule. User responsibilities are discussed in section 5.3 of this report. A user seeking protection from Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) liability as an innocent landowner, bona fide prospective purchaser, or contiguous property owner must complete all components of the AAI process in addition to meeting ongoing obligations. AAI components, CERCLA liability relief, and ongoing obligations are discussed in the AAI Rule and in Appendix XI of the ASTM E 1527-05 Standard.

1.2 Site Identification

The subject site, comprised of approximately 102 acres, is located at 340 White River Parkway, West Drive South 50, in Indianapolis, Indiana, as shown on the Project Locus, Figure 1. The subject site is currently owned by Motors Liquidation Company and is used by General Motors Company for manufacturing automotive parts.

1.3 Scope of Services

Haley & Aldrich performed the following scope of services to complete this Phase I assessment. These services were performed either by, or under the direct supervision of, an environmental professional as defined by the AAI Rule.

1. Conducted visual observations of site conditions, and of abutting property use, to evaluate the nature and type of activities that have been or are being conducted at and adjoining to the subject site, in terms of the potential for release or threat of release of hazardous substances or petroleum products.

2. Reviewed federal, state, tribal, and local environmental database information within the ASTM-specified distance from the subject site using a database service to access records. Used 7.5-minute topographic maps to evaluate the subject site's physical setting.

3. Reviewed state environmental files pertaining to the subject site and nearby sites with the potential to impact the subject site.

4. Reviewed previous reports prepared for the subject site.

5. Reviewed the following sources of historical use information: Sanborn maps, aerial photographs, and historical topographic maps.

6. Contacted local agencies regarding the subject site and surrounding properties and structures.

7. Interviewed the key site manager and property tenant representatives.

8. Interpreted the information and data assembled as a result of the above work tasks, and formulated conclusions regarding the potential presence and impact of RECs, including HRECs.

1.4 Non-Scope Considerations

The ASTM E 1527-05 Standard includes the following list of "additional issues" that are non scope considerations outside of the scope of the ASTM Phase I assessment practice: asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, bio-agents, and mold. These items were not included in this Phase I assessment of the subject site.

A limited assessment of the presence of polychlorinated biphenyls (PCBs) is included in the ASTM work scope. Accordingly, our assessment of the presence of PCBs is limited to those potential sources specified in the ASTM E 1527-05 Standard as "electrical or hydraulic equipment known or likely to contain PCBs…to the extent visually and or physically observed or identified from the interview or records review."

1.5 Exceptions and Deviations

1.5.1 Deviations

Haley & Aldrich completed this Phase I assessment in substantial conformance with the ASTM E 1527-05 Standard. In our opinion, no additions were made to or deviations and deletions made from the ASTM work scope in completing this Phase I assessment.

1.5.2 Data Gaps

Data gaps exist in the scope of work for this Phase I ESA. We have not received responses to our FOIA requests from the U.S.EPA and IDEM. We have reviewed documents for the subject site available on the IDEM Virtual File Cabinet. Based on the information obtained through our interviews with key site personnel, and our review of other records, it does not appear that responses to the FOIA requests should affect our conclusions regarding RECs on the subject site. However, when a response is received, it will be forwarded to MLC and, if it affects our conclusions regarding the site, MLC will be informed verbally and in writing.

1.5.3 Limitations

Our work for this project was performed in accordance with the standards and practices set forth in 40 CFR Part 312 and is consistent with the ASTM E 1527-05 Standard for Phase I Environmental Site Assessments. Several organizations other than ASTM, such as professional associations ASFE and AGWSE, have also developed guidelines or standards for environmental site assessments. The Phase I assessment presented in this report may vary from the specific guidelines or standards required by other organizations.

This Phase I assessment was prepared pursuant to an authorization to proceed dated 13 April 2010 and a proposal dated 21 April 2010, collectively termed, "Agreement" between Motors Liquidation Company and Haley & Aldrich, which Agreement is attached hereto and is made a part of this report. All uses of this report are subject to, and deemed accepting of, the conditions and restrictions contained in the Agreement. The observations and conclusions described in this report are based solely on the Scope of Services provided pursuant to the Agreement. Haley & Aldrich has not performed any additional observations, investigations, studies, or other testing not specified in the Agreement. Haley & Aldrich shall not be liable for the existence of any condition the discovery of which would have required the performance of services not authorized under the Agreement.

This report is prepared for the exclusive use of Motors Liquidation Company in connection with a potential sale of the property. There are no intended beneficiaries other than Motors Liquidation Company. Haley & Aldrich shall owe no duty whatsoever to any other person or entity on account of the Agreement or the report. Use of this report by any person or entity other than Motors Liquidation Company for any purpose whatsoever is expressly forbidden unless such other person or entity obtains written authorization from Motors Liquidation Company and from Haley & Aldrich. Use of this report by such other person or entity without the written authorization of Motors Liquidation Company and Haley & Aldrich shall be at such other person's or entity's sole risk, and shall be without legal exposure or liability to Haley & Aldrich.

Use of this report by any person or entity, including by Motors Liquidation Company, for a purpose other than for the sale of the property is expressly prohibited unless such person or entity obtains written authorization from Haley & Aldrich indicating that the report is adequate for such

other use. Use of this report by any person or entity for such other purpose without written authorization by Haley & Aldrich shall be at such person's or entity's sole risk and shall be without legal exposure or liability to Haley & Aldrich.

This report reflects site conditions observed and described by records available to Haley & Aldrich as of the date of report preparation. The passage of time may result in significant changes in site conditions, technology, or economic conditions, which could alter the findings and/or recommendations of the report. Accordingly, Motors Liquidation Company and any other party to whom the report is provided recognize and agree that Haley & Aldrich shall bear no liability for deviations from observed conditions or available records after the time of report preparation.

Use of this report by any person or entity in violation of the restrictions expressed in this report shall be deemed and accepted by the user as conclusive evidence that such use and the reliance placed on this report, or any portions thereof, is unreasonable, and that the user accepts full and exclusive responsibility and liability for any losses, damages, or other liability which may result.

2 SITE DESCRIPTION

2.1 Site Ownership and Location

2.1.1 Name of Site Owner

Motors Liquidation Company
500 Renaissance Center
Suite 1400
Detroit, Michigan 48243

2.1.2 Name of Site Operator

General Motors LLC
Detroit, Michigan

2.1.3 Project Locus Map

The United States Geologic Survey (USGS) topographic map for the subject site is the Indianapolis West, IN Quadrangle, dated 2002 (see Figure 1). The USGS topographic map was used as the source for subject site setting information. The subject site is located in Marion County.

2.2 Site and Vicinity Description

Figure 2 is a Site Plan of the subject site and shows relevant features of the subject site and immediately adjoining properties, as described below.

The subject site consists of approximately 102 acres. The subject site is occupied by the General Motors LLC (GM), and is zoned Industrial. Subject site operations currently include manufacturing of automotive parts and related operations. The area in the vicinity of the subject site is generally characterized as urban industrial, commercial, and residential. The subject site is bordered to the north by railroads. In the area north of the subject site and railroads, there is a parking lot for IndyGo with a small building, vacant land, and a metal recycling facility (J. Solotken & Co.). The subject site is bordered to the east by South White River Parkway West Drive. In the area east of the subject site and the roadway is the White River. The subject site is bordered to the south by Oliver Avenue and railroads. In the area south of the subject site there are commercial (several auto repair shops and a dry cleaner) and residential properties. The subject site is bordered to the west by Division Street, Arbor Avenue, West Alley 435 S, and South Harding Street. In the area west of the subject site there are several recycling facilities (Circle City Metal Recycling, White River Recycling, Ray's Recycling), several machine shops (Hoosier Machine & Welding, State Gear Company), several facilities with unknown activities (Suspension Systems, Organic Power Solutions) and residential properties.

The surrounding industrial and commercial facilities may have an environmental impact on the subject site because much of the surrounding area may be up-gradient to the subject site with respect to local groundwater flow. These facilities may be upgradient with respect to groundwater flow because the subject site is between them and the White River and pumping operations on the subject site to control groundwater in basements.

2.3 Physical Setting

Subsurface explorations were not performed for this Phase I assessment; therefore, subject site geology and hydrology were evaluated on the basis of readily available public information and reviewed documents.

2.3.1 Topography

According to the EDR Radius Map™ Report with GeoCheck®, the subject site is topographically flat with a slight slope down to the east from an elevation of approximately 700 feet on the west end to 688 feet on the east end.

2.3.2 Geology

According to The Encyclopedia of Indianapolis the subject site is located on coarse-grained glacial outwash deposit overlying bedrock. According to the EDR Radius Map™ Report with GeoCheck®, bedrock was encountered at a depth of 81 feet in a production well on the subject site property.

2.3.3 Hydrology

Surface water flow at the subject site is almost entirely influenced by buildings and paved areas which collect surface water and direct it to the subject site's storm water sewer system.

Based on regional topography, regional groundwater flow at the subject site is anticipated to have an eastward component of flow toward the White River and a southward component of flow with the direction of the White River's flow. The White River is located approximately 200 feet east of the subject site. Local groundwater flow at the subject site is likely to be influenced by the dewatering around the subject site's buildings basements. Additionally, groundwater is pumped from an on-site production well near the northeast corner of the main production building for on-site non-potable use. Hydrogeologic investigations were not performed on the subject site during this Phase I assessment; therefore, it is unknown to what extent localized variations in groundwater depth and flow occur on the subject site.

According to the EDR Radius Map™ Report with GeoCheck® the subject site, the subject site is located within FEMA designated a 500-year floodplain. The subject site is serviced by Veolia Indianapolis Water. A groundwater production well is located on the subject site that, according to subject site personnel, supplies water for on-site non-potable uses. According to the EDR Radius Map™ Report with GeoCheck® forty-five (45) wells were identified within one mile of the subject site and wells within one-half mile of the site may be used for drinking water sources.

3 PREVIOUS REPORTS

ASTM E 1527-05 Standard Section 10.8 requires that, prior to the site visit**,** the current subject site owner or key site manager and user, if different from the current owner or key site manager, be asked if there are any helpful documents that can be made available for review. These consist of environmental site assessment reports, audits, permits, tank registrations, Material Safety Data Sheets, Community Right-to-Know plans, safety plans, hydrogeologic or geotechnical reports, or hazardous waste generator reports.

We were given access to subject site environmental files and found the following reports relevant to defining RECs on the subject site. A summary of pertinent information contained in these reports is included herein. Copies of these reports are included on CD in Appendix F.

"Exhibit B", Fuel & Oil Storage Tank General Information. Spill Prevention Control and Countermeasures Plans for Chevrolet Motor Division, GMC Indianapolis, Indiana (Operating since 1935). Revised June 15, 1977.

This table provides information about 30 above ground storage tanks (ASTs) and USTs located on the property that range in tank size from 300 gallons to 30,000 gallons.

Internal communication between the Resident Comptroller and Plant Manager Re: Gasoline Accountability. 28 August 1981.

The letter to the Plant Manager is regarding a discrepancy in the log book of regular gasoline, unleaded gasoline and diesel fuel that has been used and the actual amount of each fuel type that is missing. The concern stated is regarding potential theft. The amount lost or unaccounted for of each is 6,620 gallons, 109 gallons and 1,913 gallons of regular, unleaded and diesel fuel respectively. The lost fuel is from the West End pumps during the period of January 1981 through July 31, 1981.

Letter correspondence via certified mail from the U.S. EPA Region V to the Chevrolet Motor Division Plant Manager. Re: Request for Information. Received 15 October 1981.

This letter request is for information regarding wastes that originated from the Chevrolet Motor Division in Indianapolis, Indiana that were transported to the A&F Material, Incorporation (A&F) or to Genet Refining and Recovery Company (Genet) in Illinois. The reason for the request of information is due to the wastes causing a "hazardous situation" including the discharge of PCBs at significant levels.

Letter correspondence via certified mail from the Chevrolet, Indianapolis Plant to the U.S. EPA Region V regarding water and hazardous materials compliance. 5 November 1981.

This letter is in response to the U.S. EPA request for information regarding generation of wastes that may have been transported to the A&F, Genet, RCD, or Cumberland locations. The letter states the plant has "no records or knowledge indicating we have ever sent any wastes to A&F, Genet, RCD or Cumberland Laboratories…". It is also stated that AA Oil Company has been utilized to haul and dispose of waste oil from the facility between January 1975 and the date of the letter.

Internal communication from GM Legal Staff to several recipients including the Chevrolet General Manager. 13 August 1982.

This letter is regarding the use of Seymour Recycling Corporation for disposal of wastes. The Seymour Recycling Corporation entered under EPA supervision for cleanup activities and announced on June 29, 1982 that is was seeking settlement monies for the surface and groundwater cleanup from those companies that disposed of wastes at the site. The document details the discussions previously held regarding the site and requests financial responsibility based upon the logic to support the financial liabilities. The financial liability for the Chevrolet-Indianapolis company is based on 1,600 tons of waste which accounts for 1.8% of the total waste.

Letter correspondence from Ulrich Chemical, Inc. to the U.S. EPA Region V. 1 December 1982. Re: Notification of Hazardous Waste Activity for Ulrich Chemical's new corporate offices.

The purpose of this letter is to provide information regarding a new warehouse and corporate headquarters for Ulrich Chemical, Inc. This letter also provides information regarding the Ulrich Chemical business as being "involved in the chemical warehousing and distribution business." The generation of hazardous wastes by Ulrich Chemical is the result of a "decision to discard commercial chemical products…" Examples provided of which products may be identified to be discarded are a result of damaged containers, off-specification material, and obsolete or expired inventories. Additionally, corrosive wastes are identified as being generated from rinsing reusable polyethylene acid containers prior to refilling. According to the letter, the rinse waters were collected, neutralized in a tank and then discharged to the municipal sewer system.

Post Closure Inspection of Ulrich Chemical Co. (Now Owned by GMC Truck Bus), Performed by DEM/HWMB Agency. 24 April 1986.

Regarding the type of operation, the inspector has written "this building is now used for the storage of metal racks. The fork truck driver school and the temporary offices of a construction manager are also located in the building.

In the additional comments section the inspector has written "GMC does not utilize this closed facility for waste storage or accumulation. No problems were noted."

Letter correspondence from the Indiana Department of Environmental Management Compliance Monitoring Section to Ulrich Chemical Company, RCRA File. Re: Trip report for the closed facility, Inspection Conducted on April 24, 1986. 10 June 1986.

This letter states the inspection of the former Ulrich Chemical facility "was requested by the Permit Section as a follow-up to this (Ulrich's) company's closure in January of 1985." The report states no hazardous waste related activities are occurring at the facility, then owned by GMC Tuck and Bus Plant 5, and no problems were noted at the facility. The letter concludes by stating "no further action is required at this facility."

Letter correspondence from General Motors Truck and Bus Group to the Division of Land Pollution Control UST Program. 25 April 1986.

This correspondence provides notification regarding sixteen USTs located at the subject site. The information provided includes the estimated tank age, total capacity, internal protection, external protection, substance stored and piping material.

Notification for Underground Storage Tanks form. 29 April 1986.

This form states the ownership of four tanks is Ulrich Chemical and the location of the tanks is on General Motors Corporation property at 398 Division Street, Indianapolis, Indiana. In the contact section it is noted "This property sold to General Motors in 1982. We do not know if they have since used these tanks." The four tanks identified in the report are as follows: one, nine year old empty 10,000 gallon tank of 1,1,1-trichloroethane, one ten year old empty 10,000 gallon tank of diesel, one eight year old empty 10,000 gallon tank of gasoline, and one fifteen year old empty 6,000 gallon tank of gasoline.

Initial Incident Report, Leaking Underground Storage Tank Section, Indiana Department of Environmental Management. 11 November 1986.

Incident report number 8611015 for the General Motors Truck and Bus Division located at 398 Division Street was generated due to discolored soil discovered during the removal of a UST that was installed approximately 1954 and had been unused since 1982. The incident report was filed because analytical results indicated 17-68 ppm of lead.

The final incident report states the area affected included 7000 sq. ft. of soil at an abandoned chemical plant. The circumstances of an unknown amount of leaded gasoline is identified as unknown with no water quality violation.

Letter correspondence from GM Truck and Bus Group to Indiana Department of Environmental Management. 13 November 1986.

The purpose of this letter is to follow up in writing of a telephone conversation regarding discovered soil contamination at the acquired property address 398 Division Street. According to the letter, four USTs were used by the previous owner to store leaded and unleaded gasoline, diesel fuel and trichloroethane. When surface soils were excavated to remove the tanks it was discovered the soils had been contaminated to a level considered to be hazardous. The letter states the soils were covered with plastic and will be disposed of to a hazardous waste landfill.

General Motors Corporation Industrial Pollution Status Report. August 1987.

The status report is a questionnaire sent to facility environmental staff to answer questions regarding facility specific conditions. In the water quality status section the item listed is stated to be underground tanks, free of leaks. In the corrective action section regarding a gasoline storage tank it is noted that leak tests were performed on all but one underground tank which was omitted due to access issues. It is also noted that "due to the age of the tank and some corrosion noted at the top, it is believed this tank could be leaking. Plans were to replace it this past spring: however, this did not materialize and removal is planned for this fall." Additional details regarding the location of the tank are not provided.

In the summary of problems and engineering evaluations, one water issue and one spill issue are listed. The water issue is regarding periodic discharges from the ELPO system to the sanitary sewer that exceed maximum allowed zinc limits. The spill issue is regarding an unknown quantity of oily waste that overflowed from a UST onto a nearby roadway and eventually into the combined sewer catch basin. The cause is listed to be from a frozen clarifier that allowed the wastewater to overflow into the oil skimmer drain that filled the underground tank. The date listed of this occurrence is December 21, 1981.

In a section included for additional comments it is noted that in 1977 and 1978 a waste oil disposal contractor disposed of facility waste oils at a disposal site that is currently under cleanup. According to the comment "GM Legal, EAS, and Chevrolet Central office are working with Cam-or (disposer) and EPA regarding a settlement."

Letter correspondence from General Motors Truck and Bus Group to the Office of Environmental Response, Indiana Department of Environmental Management. 14 September 1988.

The purpose of this letter was to update the status of the subject sites USTs. According to the letter, tanks #1, 2, 3, 12, 13, 14, 15, and 16 were removed and destroyed. Tank #1 was replaced with tank #17 and tank #16 was replaced with an above ground propane tank.

Underground Storage Tank Closure in Place. GM Truck & Bus Group, Indianapolis, Indiana. Prepared by: Alt & Witzig Engineering Inc. 10 September 1990.

This report summarizes the work performed to close in place an 8,000 gallon tank used for heating fuel oil and also remove approximately 6,400 gallons of product prior to the closure in place. The tank is located on the north side of Plant #3 approximately 120 feet east of the northeast corner of the building and 4 feet north of the building. The tank was closed in place due to the proximity to the building and concern for building integrity if removal was performed. According to the report, the tank was cleaned according to API recommended practice #1604 which produced two 55-gallon drums product-sludge mixture that were disposed of by Tank Technologies. Following cleaning, four 4-inch diameter openings were created in the side walls and bottom of the tank to collect soil samples for analytical analysis. All but one sample from the south wall near the tank vent line detected total petroleum hydrocarbons at a level of 100 ppm or less which was acceptable by IDEM at the time of the report. The soil sample from the south wall detected TPH at 1,876 ppm. IDEM was notified of the

sample results and informed of the intent to close the tank in place. The report states "according to the IDEM representative, GM Truck & Bus was asked to document their findings, proceed with the filling in place of the tank, and to devise a remediation program to treat the contaminated soil." The conclusion of the report recommends GM Truck & Bus provide a copy of the report to IDEM and perform a bioremediation program that was being formulated at the time of the report.

Letter report by Alt & Witzig Engineering, Inc. to Truck & Bus Group, Indianapolis Manufacturing Plant, re: Soil sampling in Area of Waste Oil Tank, North Side if I Room. 10 September 1990

This letter report summarizes a soil investigation that followed the excavation of an area with potential contamination. According to the report twelve soil samples were collected and nine soil samples were submitted for laboratory analysis of TPH. The report states the TPH concentrations were detected at "significantly higher than 100 ppm" levels. The reports also states that although IDEM does not have current standards regarding acceptable levels of TPH, values over 100 ppm are generally not acceptable and therefore it is recommended to conduct further investigation of the area and delineate the extent of contamination. A summary table provided with the report identifies a TPH result as high as 68,020 ppm at a depth of 7'6" below ground surface.

Waste Oil Tank Investigation. Prepared by Heritage Remediation/Engineering, Inc. 28 November 1990.

This report summarizes work performed by Alt & Witzig and Heritage Remediation to determine the extent of soil contamination in the area immediately surrounding a waste oil tank. During the investigation groundwater contamination was discovered but "believed to be an up gradient and unrelated situation with respect to the waste oil tank." The following reasons are cited in the report to support this statement: contamination is found in only one well that is hydraulically up gradient from the waste oil tank, there is no evidence to support the possibility of a reversed hydraulic gradient, compounds detected are not waste oil products and other samples collected from down gradient locations did not have any contamination detected.

Letter Correspondence via Certified Mail from IDEM Assistant Commissioner Solid and Hazardous Waste Management to Plant Manager GMC Truck and Bus Group. 15 March 1991.

This letter states confirmation that IDEM has received certification total closure has been completed in accordance to the approved closure plan and container storage of hazardous waste has been eliminated. The letter also states the facility will be classified as a generator and is no longer required to maintain financial assurance for the closure of the hazardous waste management units.

Internal letter correspondence from General Motors Truck and Bus Group Plant Engineering to Operating Staff. Re: Policy of Handling and Disposal of Steel Drums. 15 July 1991.

This letter was issued as a reminder to operating staff to dispose of empty drums in the incinerator room at bay B-67 where any remaining oil will be removed for recycling. It is further stated to no longer take empty drums to the trash compactors located in the general plant. The attached map of the facility identifies the trash compactor as located in the northwest corner of the main facility.

Underground Storage Tank Closure, General Motors Corporation, Truck and Bus Group. Prepared by August Mack Environmental Ind. 3 March 1992.

This report summarizes activities performed associated with the removal of one 6,000 gallon UST located at the subject site. Six confirmation soil samples were collected and analyzed. Three samples had TPH results <10ppm and three samples with detections of TPH from 13 to 29 ppm.

Preliminary Assessment/Visual Site Inspection of the General Motors Corporation – Truck and Bus Group, Indianapolis, Indiana. EPA I.D. No. IND079583720. Prepared for U.S. EPA Region V, by A.T. Kearney, Inc. September 1992.

The Preliminary Assessment/Visual Site Inspection (PAVSI) was performed to assess the potential for releases at the facility. The report provides a detailed summary of the GM Truck and Bus Operations including known release history, regulatory history, solid waste management units (SWMUs), areas of concern (AOCs), the site environmental/geographical setting and also provides recommendations for additional environmental investigations at the subject site.

All twenty-four SWMUs and five AOCs are described according to a descriptive title, conclusion regarding potential environmental impact and recommendations. Additionally, the SWMUs and AOCs are tabulated to include operational dates, evidence of release information and summarized suggested further action.

Preliminary Assessment/Visual Site Inspection of the General Motors Corporation – North American Truck Platforms, Indianapolis, Indiana (Formerly Ulrich Chemical, Inc EPA I.D. No. IND006044333). Prepared for U.S. EPA Region V, by Resource Applications, Inc. December 1993.

The Preliminary Assessment/Visual Site Inspection (PAVSI) was performed to assess the potential for releases at the facility. The report provides a detailed summary of the former Ulrich Chemical Operations including known release history, regulatory history, solid waste management units (SWMUs), areas of concern (AOCs), the site environmental/geographical setting and also provides recommendations for additional environmental investigations at the subject site.

Two SWMUs and two AOCs are described according to a descriptive title, conclusion regarding potential environmental impact and recommendations. Additionally, the SWMUs and AOCs are tabulated to include operational dates, evidence of release information and summarized suggested further action.

Letter correspondence from GM North American Truck Platforms Indianapolis Manufacturing to Indiana Department of Environmental Management, Office of Environmental Response, UST Branch. 28 November 1994.

The purpose of this letter is to update the number of USTs at the facility. The letter states the tanks numbered sequentially from two through twelve have been removed and "properly disposed of per regulations in effect at the time of removal." Tanks seven through ten were removed in 1986, tanks three and four were removed in 1987, tank two and eleven were removed in 1988, tank twelve was removed in 1990 and tanks five and six were removed in 1992. Tank two was replaced with another UST and tank eleven was replaced with an above ground propane storage tanks.

Letter correspondence from Indiana Department of Environmental Management to North American Truck Platforms General Motors Corporation, Indianapolis, Indiana. Re: Noncompliance with NPDES Permit No. IN0001902. 10 April 1995.

The purpose of this letter is to provide a warning of noncompliance to the subject site regarding several violations of the NPDES permit regarding the monthly daily maximum oil and grease limit. According to the letter, the oil and grease concentration was exceeded during two months in 1992, two months in 1993 and five months in 1994. The letter requires a written response with detailed corrective action and explanation of any mitigating circumstances.

City of Indianapolis Department of Public Works, Environmental Resources Management Division Annual Inspection Report of GM Truck and Bus located at 340 S. White River Parkway, Indianapolis, Indiana. 27 October 1995.

The inspection report provides information regarding the plant inspection, applicable regulations, compliance history, general comments, visible emissions, recommendations, enforcement actions during the previous five years, complaints registered in the previous year and malfunctions reported in the previous year.

Although some pieces of equipment are identified to be in poor condition the report consistently states the facility "appears to be in compliance…." with the required standards and permits. Under the compliance history section the only sentence states "the source appears to have been in compliance with state and local regulations the past five years." Recommendations are to perform quarterly surveillance of the facility. No enforcement, complaints or malfunctions are listed in the report.

Property Phase III Investigation for H. Meuhlstein, Inc. Prepared by Radian International LLC. 28 March 1997.

This report summarizes activities performed for the removal and subsequent closure of four USTs associated with Plant #5 (aka the Meuhlstein Property). According to the report each UST and all associated piping was removed, inspected for leaks and disposed of off-site. The report states soil samples were collected and submitted for analytical analysis in accordance with the current (1997) IDEM closure guidelines. According to the report the analytical results indicated no further investigation work was necessary.

Indiana Department of Environmental Management (IDEM) correspondence via certified mail to General Motors Corporation Truck and Bus Group. 6 August 1998. Re: NPDES Permit No. IN0001902

This letter states the IDEM agency agrees to void the NPDES permit based on the knowledge that "noncontact cooling water is being discharged to the sanitary sewer system and the facility has applied for a general permit for storm water runoff." The letter concludes with the reminder that any future discharge to public waters must be preceded with the submission of a NPDES permit application at least 180 days prior to the commencement of any discharge.

Site Investigation: GM-Metal Fabricating Division. Environmental Audit Report. Prepared By: Terra Environmental Corporation. 17 February 1999.

This report summarizes a UST site investigation performed by Terra Environmental Corporation. According to the report the investigation was completed in conformance with the Indiana Department of Environmental Management (IDEM) UST requirements for site investigations. The focus of the investigation was to determine the magnitude groundwater had been impacted in the area surrounding the UST. Samples collected were analyzed for benzene, toluene, ethylbenzene, xylene (BTEX) and methyl tertiary-butyl ether (MTBE). Four groundwater samples were collected from four locations using a Geoprobe screen point sampler. The report states each groundwater sample detected the presence of benzene, two samples detected the presence of toluene and one sample detected the presence of ethylbenze. The report also states that even though benzene was detected above the MCL for drinking water at each location no further action was recommended.

UST Closure Report, General Motors Corporation Metal Fabrication Division. Prepared by Arcadis Geraghty & Miller. 3 August 2000.

This report provides a summary of activities performed to close a 1,000 gallon former heating oil UST. Activities included the removal and disposal of the tank and collection and analysis of confirmatory soil samples. All soil samples analyzed had concentrations below the laboratory detection limits.

Security Incident Report. 26 February 2002.

According to the incident report diesel fuel was observed on the ground surrounding a fuel pump. Two employees utilized diking material to prevent fuel from entering the sewer. Facility investigation concluded someone refueling a vehicle had driven away with the refueling hose still in the vehicle. According to the report the incident occurred at the southwest lot refueling station.

Letter correspondence from GM Metal Fabricating Division to Leaking Underground Storage Tank Section, Indiana Department of Environmental Management. 18 March 2002.

This letter correspondence is regarding a "potential UST issue" associated with a 10,000 gallon gasoline UST. The letter states the initial notification to IDEM was made on 5 March 2002 and referred to the LUST branch on 8 March 2002. The events leading up to the suspected issue began with the refueling of twenty-one company cars that would not restart. It was discovered approximately 300 gallons of water had infiltrated the gasoline tank. Two nearby monitoring wells were checked for free product and samples were collected for laboratory analysis. The secondary containment area around the tank was inspected and found not be filled with water. Both tank and pipeline tightness tests were scheduled at the earliest date possible which was 8 March 2002. The fill lines tested normal but the tank would not hold pressure. It was discovered the pressure failure was at least partially due to a broken weld between a rise pipe and the tank and concluded to be the cause.

GM states a report will be submitted upon receipt of the tank test results and the analytical report regarding the groundwater samples. GM also states intent to remove the contents of the tank and obtain cost estimates for tank repair even though "the plant would like to remove the tank by mid-May, 2002 and go through closure."

Indiana Department of Environmental Management (IDEM) Email Initial Incident Report, Leaking Underground Storage Tank Section. Incident # 200205501. 3 May 2002.

According to the incident report a 10,000 gallon tank of gasoline impacted soils and groundwater. The report notes the date of discovery as 19 March 2002. The recorded highest lab result for impacted groundwater is 240 ppb, 170 ppb and 200 ppm of benzene, toluene and xylene.

Notes regarding the incident state the soil contamination was discovered during excavation of the UST. A crack in the tank was observed during cleaning as well as soil that visually appeared to be impacted.

Security Incident Report. 30 April 2002.

According to the incident report a fork lift truck driver fell off a loading dock into the train track well causing a battery acid leak. Rail cars were removed and facility personnel cleaned up any visible contamination. Details regarding the cleanup or any disposal are not provided.

UST Initial Site Characterization Report, General Motors – Metal Fabrication Facility, Indianapolis, Indiana. Prepared by Heritage Environmental Services, LLC. 29 October 2002.

This report was submitted to IDEM regarding the removal of a 10,000 gallon UST located at the subject site Executive Parking area on the east side of the facility. A release from the UST was assumed as a result of a preliminary UST cavity well sampling after which IDEM was notified and assigned an incident number with a medium priority level on May 3, 2002. During the investigation it is reported that free product was not observed and groundwater was not encountered during the investigation.

Approximately 288 tons of contaminated backfill was excavated prior to collection of confirmation soil samples. Groundwater samples were collected with the aid of a Geoprobe rig and peristaltic pump. Soils samples were analyzed for TPH compounds and groundwater was analyzed for BTEX and MTBE. Both groundwater and soil sample results indicated no additional investigation was required.

Underground Storage Tank (UST) Information Summary - General Motors – Indianapolis Metal Center, Indianapolis, Indiana - Facility ID: 2117. 16 September 2003.

This report summarizes UST history and activity at the site. Two notifications and three LUST incidents are described. The report includes the following statement regarding regulatory status of many of the subject site's former USTs "all USTs had to be registered after May 8, 1986; and that USTs closed between December of 1988 and July of 1992 had to follow federal guidelines, and USTs closed after July 1992 had to follow IDEM guidelines. Based on this understanding, nine USTs (Tanks 1, 2, 3, 8, 12, 13,

14, 15, 16) were closed prior to December 1988, and needed only to be registered, which was completed through the submission of the 1986 Notification of UST form (provided as Attachment C[sic]). No further action is warranted for these tanks."

Letter correspondence from IDEM to the GM Truck & Bus Manufacturing Division, Regarding Indiana Department of Environmental Management. 16 February 2004.

This letter is a request for information regarding two LUST incidents at the subject site.

Memorandum, Results of Second Phase of Investigation at the Baler Building. Prepared by Arcadis G&M, Inc. 9 October 2003.

The draft memorandum provides information regarding soil and groundwater results collected and analyzed to further delineate SVOC impacts surrounding the Baler Building. According to the memorandum, the additional soil borings delineated the SVOC impact in all directions except south toward the main building. Three permanent monitoring wells were installed due to previous detections of arsenic in groundwater. Additional groundwater sample analysis indicated arsenic at concentrations above applied screening criteria.

DRAFT: Additional Investigation of Possible Soil and Groundwater Impacts – Baler Building. General Motors Metal Fabrication Center, Indianapolis, Indiana. Prepared For Environmental Corporate Remediation Co. Inc. by Arcadis. 23 January 2004.

This report summarizes activities performed associated with a soil and groundwater investigation performed to investigate potential environmental impacts by TAL metals, PCB's, VOC's and SVOC's surrounding the Baler Building located on the north side of the facility. According to the report, no soil samples analyzed by the laboratory exceeded the applied screening criteria utilized which included the USEPA Region 9 PRG's and the State of Indiana Risk Integrated System of Closure (RISC) default closure levels for industrial land use. Groundwater samples collected from two of three monitor wells installed exceeded the applied screening criteria for SVOC's.

The site geology, as extrapolated from information received from the soil boring installations and groundwater monitor well installations is also included in the report. The subsurface geology around the Baler house consists of sand and gravel to 5 feet below ground surface (bgs) underlain by medium to coarse brown sand that is saturated at approximately 15 ft. bgs. A black material that was consistently found in the upper 2 ft. at each boring location was analyzed and determined to be bituminous coal. Based on three monitor wells that were surveyed to an arbitrary benchmark, the potentiometric surface indicates groundwater flow is to the west-southwest away from the White River.

Letter correspondence from the Indiana Department of Environmental Management (IDEM) to GM Truck & Bus Manufacturing Division. Re: No Further Action. LUST #200205501, FID# 2117. 16 February 2004.

This letter states "a non-default, residential closure for subsurface soil and residential closure for groundwater is granted for this site based on the information provided. Therefore, no further action is required at this time as long as the property restrictions are maintained." A UST closure report dated 15 September 2003, preceding correspondences regarding the closure of the UST, the Site Plan Characterization report and Groundwater Sampling Results and preceding UST closure reports and investigation reports are attached to the letter.

Internal correspondence regarding an oil incident. 24 February 2004.

The correspondence provides details regarding the cause and following response of a fork lift puncturing a 340 gallon tote of oil. The fork lift was unmanned at the time of the incident and caused the tote to nearly empty as the forks punctured the plastic tote near the base. The fork lift driver and other employees attempted to prevent the oil from entering any storm drains with the aid of loose sand. This incident occurred outside the "I" room at the west end of the plant. According to photo documentation of

the incident, oil spread along the northwest corner of the plant building and clogged at least one drain. Several plant security incident reports from employees that assisted with the storm sewer protection or observed the activities are on file. All accounts are nearly identical regarding activities observed or participated.

Correspondence from the General Motors Truck and Bus Group Environmental Engineer to the Department of Public Works Office of Environmental Services, Indianapolis Indiana. 3 March 2004;

This letter is a follow up to a conversation initiated by General Motors regarding a detected TPH exceedance (above 200 mg/L) in a sanitary sewer water sample. The letter states the cause of the exceedance is unknown but is being investigated.

Correspondence from the General Motors Truck and Bus Group Plant Manager to the Department of Public Works Office of Environmental Services, Indianapolis Indiana. 22 July 2004.

This letter is a follow up to a conversation regarding a detected TPH exceedance (above 200 mg/L) in a sanitary sewer water sample. The letter identifies the possible cause to have been related to heavy cleaning of the basement areas that have a high volume of hydraulic and lubricating oils that pool on the floor. The period of noncompliance is reported to have occurred for one week with follow up sampling confirming compliance with the 200 mg/L limit.

Correspondence via Certified Mail from the General Motors Truck and Bus Group Plant Manager to the Department of Public Works Office of Environmental Services, Indianapolis Indiana. 26 July 2004.

This letter is a follow up to a conversation and letter notification regarding a detected TPH exceedance (above 200 mg/L) in a sanitary sewer water sample. The letter identifies the cause to have been related to heavy cleaning of the basement areas during a plant shut down that have a high volume of hydraulic and lubricating oils that pool on the floor.

Correspondence via Certified Mail from the General Motors Truck and Bus Group Plant Manager to the Department of Public Works Office of Environmental Services, Indianapolis Indiana. 18 August 2004.

This letter is a follow up to a conversation and letter notification regarding a detected TPH exceedance (above 200 mg/L) in a sanitary sewer water sample. The letter identifies the cause to have been related either to the beginning of a regular schedule following the summer shut down or due to heavy cleaning of the basement areas during a plant shut down that have a high volume of hydraulic and lubricating oils that pool on the floor.

Correspondence via Certified Mail from the General Motors Truck and Bus Group Plant Manager to the Department of Public Works Office of Environmental Services, Indianapolis Indiana. 24 August 2004.

This letter is a follow up to a conversation and letter notification regarding a detected TPH exceedance (above 200 mg/L) in a sanitary sewer water sample. The letter identifies the cause to have been related to heavy cleaning of the basement areas during a plant shut down that have a high volume of hydraulic and lubricating oils that pool on the floor.

Letter correspondence from Indiana Department of Environmental Management (IDEM) to GM Truck & Bus Manufacturing. Re: No Further Action. 23 September 2004.

This letter identifies a discrepancy that existed within the IDEM database and site file regarding incident #199201545. Although the incident may have been associated with the facility the letter states it is currently associated with a facility in Jeffersonville, Indiana and is no longer associated with the GM Truck & Bus facility. A new incident number of 199201611 was assigned to the release reported via phone on 27 January 1992 regarding the closure of a 6,000 gallon waste water tank. Based on the information regarding the 6,000 gallon release incident, IDEM stated no further action is required but based on further information regarding the incident IDEM reserves the right to change or modify this determination.

Tank 6 Subsurface Investigation. General Motors Fabrication – Indianapolis Metal Center, Indianapolis, Indiana. Prepared by Arcadis, Inc. 22 December 2004.

This report provides a summary of investigation activities following a report to IDEM regarding a release from UST #6. The scope of work, developed with consultation from IDEM's LUST branch, includes sampling and laboratory analysis of soil and groundwater samples. Based on the analytical results it was concluded the tank had not impacted soils or groundwater above RISC levels. In the conclusion section of the report, a request is made for IDEM to close the LUST number 199008633 associated with this tank and issue a No Further Action letter.

Letter correspondence from the Indiana Department of Environment Management to GM Truck & Bus Manufacturing Division Re: No Further Action, LUST #199008633. 4 February 2005.

This letter confirms the Indiana Department of Environmental Management (IDEM) has reviewed the summary report and analytical data associated with the removal of UST #6 and have determined "no further action is required at this time".

Groundwater Monitoring Report, General Motors Indianapolis Metal Fabrication, Indianapolis, Indiana. 17 February 2005.

This report provides results of four rounds of groundwater sampling conducted in 2004 on three groundwater monitoring wells in the Baler Building area. The wells were sampled for 20 inorganic compounds and no exceedances of IDEM RISC Default Closure Levels (Industrial) updated January 1, 2004, MCLs or Region 9 PRGs were reported.

Correspondence from the General Motors Truck and Bus Group Sr. Environmental Engineer to the Department of Public Works Office of Environmental Services, Indianapolis Indiana. 31 March 2005.

This letter is a follow up to a conversation regarding a detected TPH exceedance (above 200 mg/L) in sanitary sewer water samples for two consecutive weeks. The letter states the cause of the exceedance is unknown but is being investigated.

Asbestos Survey Report, Indianapolis Metal Fabrication Division (MFD), Indianapolis, Indiana. Prepared by The Traverse Group. 23 February 2006.

The asbestos survey report provides detailed information regarding samples analyzed for asbestos from several buildings and structures at the subject site. Samples were collected from areas in the metal fabrication building, compressor building, fire protection west pump house, electric switch house, west truck repair carpenter shop, baler room, fire protection east pump house, and the paint mix oil storage building. Areas that were inaccessible or would otherwise interrupt production activities were not sampled but assumed to contain asbestos materials.

Environmental Audit Report, Former Caustic Tank Area Investigation Report, General Motors Indianapolis Metal Fabrication, Indianapolis, Indiana. Prepared by Arcadis G&M, Inc. 18 September 2006.

This report summarizes the investigation activities performed in the vicinity of the former caustic tank associated with the waste water treatment operations. The former caustic tank had a 6,000 gallon capacity and was located above ground on a concrete slab. To determine if soils had been impacted beneath the concrete slab, soil samples collected via hand augers were submitted to the laboratory for analysis in addition to a sample of a white powder that had precipitated on the concrete slab. According to the report, "no unacceptable human health risk is associated with the soils immediately beneath the former caustic tank" but the "powder is likely a precipitation of the former caustic stored in the tank" and "precautions taken in handling any caustic should also be taken when handling the precipitated powder."

Correspondence via Certified Mail from the General Motors Truck and Bus Group to the City of Indianapolis Industrial Pretreatment Program, City of Indianapolis. 16 August 2007.

The letter states compliance with the required five day notification of an accidental discharge and follow up to a phone conversation initiated by General Motors on 13 August 2007 about the potential accidental discharge due to the release of oil during a temperature reading. The report notes a basement sump may have discharged some oil to the sewer but was "expeditiously cleaned" to prevent any additional slugs of oil being sent to the sanitary sewer system.

GM Environmental Spill/Release Tracking Form. 31 August 2007.

This report identifies a potential release of oil to the storm sewer. According to the form, a pipefitter was tightening an emerged thermometer threaded into an oil transfer pipe when the thermometer broke from the pipe causing a quarter inch stream of oil to be released for approximately 10 minutes. The oil reportedly drained to a basement trench then to a sump that discharges to the sanitary sewer. The pipefitter was unsure if the sump had cycled on to pump some of the oil to the lift station and sanitary sewer. The pipefitter estimated a release of 50-100 gallons from the oil line and approximately 20-30 gallons of oil/water to the lift station if the sump pump had cycled on for one cycle.

Table of Hazard Identification Tanks – Indianapolis Metal Center. Updated 5 September 2007.

This table identifies six tanks (no. 11, 12, 13, 19, 20 and 21) as being present on the subject site, currently in use and containing either gasoline or diesel fuel. Tanks #11 and #12 were installed in 1991 and are located in the "West Yard". They contain unleaded gasoline and No. 2 diesel fuel respectively. Tank 13 was installed in 1986, contains No. 2 diesel fuel and is located in the distribution center. Tank 19 was installed in 1964, contains No. 2 diesel fuel and is located at the East Pump House. Tanks 20 and 21 were installed in 1979, contain No. 2 diesel fuel and are located at the West Pump House.

City of Indianapolis letter correspondence via certified mail to General Motors Corporation Plant Manager, Indianapolis, IN. 19 February 2008.

This letter states the Industrial Discharge Permit #371402 is no longer required of the facility effective April 1, 2008. Additionally, GM is specifically allowed to "*discontinue* testing for biochemical oxygen demand on a monthly basis. (but) *continue* monthly submissions of the "Statement of Industrial Waste" to Indianapolis Water for well-water reporting." The letter also states the City of Indianapolis assumes the continued use of the GM treatment system to maintain the quality of the facility discharge of wastewater.

Environmental Emergency Incident Evaluation Table. Internal Communication. Last Revision 1 December 2008.

The table lists communications and activities performed by the environmental group, including items such as evacuation testing. The table identifies the following: date of incident, type of incident, if the incident has been reviewed for compliance with environmental regulations, if the emergency plans, procedures or operational controls need to be revised, if the spill equipment has been replenished and any comments regarding nonconformance reports.

Several spills are identified in the table. Below is a summary of the spills or incidents that may have had the potential to impact soils or groundwater.

Date of Type of Incident	Type of Incident	Has Incident been reviewed for Compliance with Environmental Regulations? If so, List date completed.	Do the Emergency Plans, Procedures or Operational Controls need to be revised? If so, Explain and list date completed.	Was the Spill Equipment replenished following the Incident?	Comments
10/11/01	Spill	Yes 10/11/01	No	Yes	Spill was cleaned up and handled properly.
10/18/01	Spill-unknown substance	Yes 10/18/01	No	None used	Identified suspected substance and cleaned up.
2/26/02	Diesel Spill – pump nozzle pulled from handle	Has been reviewed 22602	No revision needed. Containment and cleanup handled properly.	Yes	No reports to outside agencies needed. Spill did not leave property or get into storm system.
4/30/02	Fork truck accident and battery acid spill.	Yes 4/30/02	An acid spill kit will be ordered for the DC for acid spill cleanup.	Yes absorbents ordered and replenished.	Workers requested an acid spill kit at DC along with the standard spill kit.
5/2/02	Hydraulic oil spill from broken line on dumpster pickup truck.	Spill was reviewed for regulation compliance and found to be within regulations.	No revision needed. Spill was handled according to plan.	Yes.	Hydraulic line broke causing approximately 2 to 5 gallons of oil to spill onto ramp. Oil did not reach storm drain or run off property.
7/31/02	Diesel fuel leak from filter on portable air compressor.	Spill reviewed and found to be in compliance with regulations.	No revisions needed. Spill was handled in proper manner.	Yes	Small leak from diesel fuel filter on compressor. Attendant tried to tighten nut on filter and started to leak. Spill was confined to small area. Nothing else compromised.

Date of Type of Incident	Type of Incident	Has Incident been reviewed for Compliance with Environmental Regulations? If so, List date completed.	Do the Emergency Plans, Procedures or Operational Controls need to be revised? If so, Explain and list date completed.	Was the Spill Equipment replenished following the Incident?	Comments
3/20/03	Acid spill	Yes 3/20/03	No	Absorbents were restocked.	No NCRs issued. Spill cleaned up and taken to Hazardous Waste Storage Area.
1/31/04 and 2/1/04	Oily water spill and clarifier.	Yes 2/2/04	No	No plant spill equipment was used.	No NCRs or reporting needed. Spill was cleaned up by contractor.
2/23/04	Oil spill outside I-room ramp: fork truck punctured 360 gallon oil tote.				See info attached to security incident form
4/28/04	Oil spill from press crown.	Yes 4/28/04	No	Sand was used to absorb oil.	No NCR. Responsible parties were notified to reinstruct employees on proper oil draining and fluid management.
7/28/04	Compound spill in Paint Mix Bldg.	Yes 7/28/04	No	Spill kit contents replenished.	Spill was contained in building by dike system. No material escaped building. Spill contractor was called to clean up spill material was handled by plant used oil system.

Date of Type of Incident	Type of Incident	Has Incident been reviewed for Compliance with Environmental Regulations? If so, List date completed.	Do the Emergency Plans, Procedures or Operational Controls need to be revised? If so, Explain and list date completed.	Was the Spill Equipment replenished following the Incident?	Comments
6/30/05	Oil spill	Yes 6/30/05	No	No absorbents used.	Leak from hydraulic lift. Absorbents used and disposed of to clean up spill. No fluid reached drains.
8/4/05	Polycrete adhesive spill.	Yes 8/4/05	No	N/A – sand used	Incident responded, cleaned and material disposed of properly.
5/21/07	Incident hydraulic release.	Yes 5/22/07	No. procedures reviewed with contractor utilizing crane.	Yes	Labor maintenance followed up with clean up. Spill report filed, but spill was incidental.
November 2008	Compound draw fluid tank overflow while unloading in oil stores building.	Yes	No	N/a	Re-instructed pipefitter to make sure and read site gauges while unloading. No material left building. Clean up was with internal pumper truck and laborers.

Correspondence via Certified Mail from General Motors Company Environmental Engineering to IDEM Office of Solid and Hazardous Waste. 24 July 2009.

The purpose of this letter is to request the transfer of the hazardous waste handler permit EPA ID IN079583720 from General Motors to General Motors Company.

IDEM letter correspondence to General Motors Company RE: Notice of Sufficiency (NOS), Permit No. INR200413. 4 September 2009.

This letter states the notice of intent (NOI) letter submitted to IDEM sufficiently complies with the NOI requirements to maintain the facility NPDES permit for storm water discharge associated with

industrial activities and will remain in compliance for up to five years provided all conditions of the permit continue to be met.

Letter correspondence from the U.S. EPA Region 5 to General Motors Corporation re: Compliance Evaluation Inspection. 3 Stamped dates: 17 September 2009, Received 25 September 2009, and Received 22 September 2009. No date listed as part of the letter correspondence.

This letter summarizes the findings of the compliance evaluation conducted on June 22, 2009 performed to evaluate the facility's compliance with requirements of the Resource Conservation and Recovery Act (RCRA) and specifically standards applicable to small quantity generators of hazardous waste and interim status standards for owners and operators of hazardous waste treatment, storage and disposal facilities. It is stated in the letter that based on information available to the EPA, the inspections "has not resulted in the detection of violation of any of the specific RCRA requirements under evaluation." All items listed on the form are shown to be "OK" or "NA".

Note the letter states the inspection occurred "on June 22, 2006…" but the received stamps all show 2009 and the signed compliance evaluation inspection report form show the inspection date as June 22, 2009.

4 SITE HISTORY

4.1 Past Usage of the Site

Haley & Aldrich assessed past usage of the subject site through a review of facility documents, Sanborn maps, city directories, and aerial photographs. Copies of historical references reviewed are included in Appendix B.

The subject site was developed industrially prior to 1898. From that time to at least 1915 carriages and buggies were manufactured on the main parcel of the subject site. Literature at the subject site indicated that by 1930 entire automobiles were being manufactured at the subject site. The main parcel of the subject site was acquired by General Motors in 1936. GM razed the buildings which had been on site and constructed a new building. The facility has been producing automotive metal stamped parts since that time.

Other parcels were acquired after 1936 to the west and northwest of the main parcel. The former Ulrich Chemical property located on the northwest corner of Division Street and Gillette Street was purchased by GM in 1982 and that property is now known as Plant No. 5. This property has been a woodworking shop, a lumber yard and a chemical warehousing and distribution business prior to acquisition by GM.

The former Meuhlstien property is located on the northeast corner of Division Street and Gillette Street. This property was acquired by GMC between 1993 and 1997. The Meuhlstien property is first shown on Sanborn maps as being occupied by the National Wheel Company, a woodworking shop in 1898. In 1915 the National Wheel buildings are shown as vacant. The 1950, 1956, 1966 and 1988 Sanborn maps show the property as being a Reclaimed Rubber Processing Plant.

The current Distribution Center parcel was formerly occupied by the Standard Oil Company of Indiana. It is shown on Sanborn maps dated 1950, 1956, 1966, and 1968. The operations shown were consistent throughout the each of the maps. Oil transfer operations are shown with an oil warehouse, a barrel filling room, a barrel paint room, a warehouse, a pump room, and a pump shed. A five foot high concrete wall is shown on the eastern end of this facility near the pump shed. This wall enclosed an area which was observed on aerial photographs as being an area of possible distressed vegetation or stained soil. The use of this area is unknown.

4.2 Past Usage of Adjoining Properties

Adjoining properties to the south of the subject site have remained residential and commercial back to at least 1898. To the west of the subject site there have been several machine shops, a lumber yard, and a tannery prior to the manufacturing facilities and salvage operations which are currently present. To the north of the subject site vacant land and railroads have occupied much of the area over the span of our research. On the western side of to the north of the property an unknown manufacturing operation was located on the parcel which currently is the IndyGo parking lot.

5 ENVIRONMENTAL RECORDS REVIEW

5.1 Standard Environmental Records Review

Haley & Aldrich used the Environmental Data Resources Inc. electronic database service to complete the environmental records review. The database search was used to identify properties that may be listed in the referenced agency records, located within the ASTM-specified approximate minimum search distances as shown in the table below. The EDR Radius Map™ Report with GeoCheck® is included in Appendix C. Section 5.1.1 presents a description of each database searched.

Database Searched	Approximate Minimum Search Distance	Subject Site Listed?	Number of Sites within Search Distance
NPL Sites	1 mile	No	0
Delisted NPL Sites	0.5 mile	No	1
CERCLIS Sites	0.5 mile	No	1
CERCLIS-NFRAP Sites	0.5 mile	Yes	10
Federal ERNS	Site only	No	0
RCRA non-CORRACTS TSD Facilities	0.5 mile	No	5
RCRA CORRACTS TSD Facilities	1 mile	Yes	10
RCRA Generators	Site & Adjoining	No	18
Federal Institutional Controls/Engineering Controls	Site Only	No	1
State and Tribal Equivalent NPL Sites	1 mile	No	1
State and Tribal Equivalent CERCLIS Sites	0.5 mile	No	0
State and Tribal Registered Storage Tanks	Site & Adjoining	Yes	37
State and Tribal Landfills and Solid Waste Disposal Sites	0.5 mile	No	1
State and Tribal Leaking Storage Tanks	0.5 mile	Yes	24
State and Tribal Institutional Controls/Engineering Controls	Site Only	No	1
State and Tribal Voluntary Cleanup Sites	0.5 mile	Yes	8
State and Tribal Brownfield Sites	0.5 mile	No	4

Haley & Aldrich also searched the Orphan Site List provided in the EDR Radius Map™ Report with GeoCheck® report for the subject site and sites adjoining the subject site. Orphan sites are those that, due to incorrect or incomplete addresses, could not be mapped. Neither the subject site nor the adjoining properties were identified on the Orphan Site List. The complete environmental database report is provided in Appendix C.

5.1.1 Descriptions of Databases Searched

Numerous regulatory databases were searched during this Phase I assessment. Each database reviewed is described in the EDR report presented in Appendix C. Those databases required by the ASTM E 1527-05 Standard are identified below. A full list of databases searched is included in Appendix C.

1. **NPL Sites:** The National Priorities List (NPL) is a list of contaminated sites that are considered the highest priority for cleanup by the U.S. Environmental Protection Agency (USEPA).

2. **Delisted NPL Sites:** The Delisted National Priorities List (NPL) is a list of formal NPL sites formerly considered the highest priority for cleanup by the USEPA that met the criteria of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) for deletion from the NPL because a no further response was appropriate.

3. **CERCLIS Sites:** The Comprehensive Environmental Response, Compensation, and Liability Act Information System (CERCLIS) list identifies sites which are suspected to have contamination and require additional investigation to assess whether they should be considered for inclusion on the NPL.

4. **CERCLIS-NFRAP Sites:** CERCLIS-NFRAP status indicates that a site was once on the CERCLIS List but has No Further Response Actions Planned (NFRAP). Sites on the CERCLIS-NFRAP List were removed from the CERCLIS List in February 1995 because, after an initial investigation was performed, no contamination was found, contamination was removed quickly, or the contamination was not significant enough to warrant NPL status.

5. **Federal ERNS:** The Federal Emergency Response Notification System (ERNS) list tracks information on reported releases of oil and hazardous materials.

6. **RCRA non-CORRACTS TSD facilities:** The Resource Conservation and Recovery Act (RCRA) non-CORRACTS TSD Facilities List tracks facilities which treat, store, or dispose of hazardous waste and are not associated with corrective action activity.

7. **RCRA CORRACTS TSD facilities:** The RCRA CORRACTS TSD Facilities list catalogues facilities that treat, store, or dispose of hazardous waste and have been associated with corrective action activity.

8. **RCRA Generators:** The RCRA Generator list is maintained by the USEPA to track facilities that generate hazardous waste.

9. **Federal Institutional Controls/Engineering Controls:** The Federal Institutional Control list and Engineering Control list are maintained by the USEPA. Some Institutional Control and Engineering Control information may not be made publicly available and therefore will not be included on this registry.

10. **State and Tribal Equivalent CERCLIS and NPL Sites:** The (ASTM E 1527-05 Standard) requires searching "State and Tribal Equivalent CERCLIS and NPL Sites." In Indiana, the equivalent CERCLIS and NPL is the List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model, which is maintained by the Indiana Department of Environmental Management.

11. **State and Tribal Registered Storage Tanks:** The Indiana Registered Underground Storage Tank List is a list of underground storage tanks registered with the Indiana Department of Environmental Management.

12. **State and Tribal Landfills and Solid Waste Disposal Sites:** Indiana Department of Environmental Management maintains a list of regulated waste disposal sites.

13. **State and Tribal Leaking Storage Tanks:** Indiana Department of Environmental Management maintains a list of Leaking Storage Tanks (LUST/LAST). The LUST/LAST lists are a listing of release sites that have an Underground or Aboveground Storage Tank listed as the source.

14. **State and Tribal Institutional Controls/Engineering Controls:** Indiana Department of Environmental Management maintains a list of sites with Institutional controls or Engineering controls in place.

15. **State and Tribal Voluntary Cleanup Sites:** Indiana Department of Environmental Management maintains a list of Voluntary Cleanup sites.

16. **State and Tribal Brownfield Sites:** Indiana Department of Environmental Management maintains a list of Brownfield sites which includes properties where redevelopment or re-use may be compromised by the presence or presumed presence of hazardous materials or petroleum.

5.1.2 Description of Relevant Subject Site Listings

The following information was found for the subject site:

- A state-led TSCA PCB transformer investigation was conducted with no violations.
- A spill of 1000-gallons of water soluble drawing compound occurred on 7/13/1995. A 10-foot by 70-foot area was affected and no water was affected.
- A spill of unknown quantity of petroleum occurred on 8/5/1993 from a leaking underground tank. A 2.2-acre area and groundwater are listed as being was affected.
- The subject site is listed under two names with both a medium and a low priority CORRACTS site meaning it is a hazardous waste site that is subject to corrective action.
- Twenty-two (22) USTs are listed as permanently Out of Service.
- A diesel fuel and a hydramethylnon USTs are listed as being in Tier 2.
- A medium priority leaking UST incident is listed as having soil and groundwater affected.
- A low priority leaking UST incident is listed as having soil affected.
- A low priority leaking UST incident is listed as having groundwater affected.
- A low priority leaking UST incident is listed as having soil affected. This incident is also described as "Discontinued (active)".
- A CEERCLIS-NFRAP (no further remedial action planned) site with an alias of Ulrich Chemical Inc is listed on the subject site.

5.1.3 Detailed Descriptions of Relevant Nearby Site Listings

The following sites were determined to be potentially upgradient of the subject site with respect to shallow groundwater flow, close enough to the subject site to be a potential environmental concern for the subject site, and listed with information which may indicate a potential release to the environment which could be a potential environmental concern for the subject site:

- A permitted landfill is listed on the White River Collection Container System site nearby and west of the subject site.
- A UST is listed at 429 South Harding as leaking heating oil.
- A leaking UST is reported at 200 S. Harding St. with soil affected and a low priority.
- A leaking UST is reported at 512 S. Harding St. with 240 square feet affected. The material is listed as Fuel Oil and the spill type is listed as Hazardous.
- A spill is reported at 512 S. Harding St. that is indicated to not be contained. The material is listed as Penkarb Deepease W/3% and the spill type is listed as Hazardous.
- A leaking UST is reported at 101 S. Harding with soil affected and a low priority. This incident is also described as "Discontinued (active)".

The following sites were determined to be nearby the subject site with no evidence of a release to the environment:

- Seventeen (17) historical dry cleaners and thirty-five (35) automotive stations are listed as being located within one-half miles of the center of the subject site.

5.2 Additional Environmental Records Review

To supplement the (ASTM E 1527-05 Standard) environmental record sources, we contacted the following state and local government agencies, and/or reviewed the following additional sources:

5.2.1 State Environmental Agency

To date, no responses have been received from the FOIA requests to IDEM. We have reviewed documents for the subject site available on the IDEM Virtual File Cabinet. Based on the information obtained through our interviews with key site personnel, and our review of other records, it does not appear that responses to the FOIA requests should affect our conclusions regarding RECs on the site. However, when a response is received, it will be forwarded to MLC and, if it affects our conclusions regarding the site, MLC will be informed verbally and in writing.

5.2.2 Building/Planning Department

The EDR Building Permit Report contained in Appendix B did not reveal any building permits for the subject site.

5.2.3 Fire Department

We contacted the Indianapolis Fire Department regarding the subject site and we were informed that no records of spills or fires could be found.

5.3 User Responsibilities

The AAI Rule requires that the user of the report consider the following:

Whether the user has specialized knowledge about previous ownership or uses of the subject site that may be material to identifying RECs; whether the user has determined that the subject site's Title contains environmental liens or other information related to the environmental condition of the property, including engineering and institutional controls and Activity and Use Limitations (AULs), as defined by ASTM; whether the user is aware of commonly known or reasonably ascertainable information about the subject site including whether or not the presence of contamination is likely on the subject site and to what degree it can be detected; and whether the user has prior knowledge that the price of the subject site has been reduced for environmentally related reasons.

We requested such information for inclusion in this report. Though neither the AAI Rule nor the ASTM E 1527-05 Standard requires that this information be provided to the environmental professional(s), failure on the part of the user to obtain such information for their own records, should it be reasonably ascertainable, may invalidate the user's compliance with the AAI Rule for CERCLA liability protection in the future.

We received a completed questionnaire from a representative of MLC and no found information regarding RECs at the subject site.

6 SITE RECONNAISSANCE AND KEY PERSONNEL INTERVIEW(S)

A site visit to observe site conditions was conducted by Dennis Kreitzburg and Rick Volpi of Haley & Aldrich, Inc. on April 19th and 20th, 2010. Haley & Aldrich personnel observed accessible interior areas of the subject site building(s), including common areas, basement areas, mechanical spaces, and tenant spaces. Haley & Aldrich also observed the exterior portions of the subject site, including the property boundaries, and observed adjoining property conditions from the subject site boundaries and/or public thoroughfares. No weather-related conditions or other conditions that would limit our ability to observe the subject site or adjoining properties occurred during our site visit.

An interview with John Chroniak, the Resource Manager / Environmental Engineer and key site manager for GM, was performed in conjunction with the site visit. The findings of the site visit and interviews are discussed below. Site photographs are included in Appendix D and the Phase I Environmental Pre-Assessment Questionnaire is included in Appendix E.

6.1 Subject Site Observations

Main Plant and Office

The main plant and office occupies the southeast portion of the subject site east of Divison. The building has over 1.3 million square feet of first floor area. The majority is steel construction with some brick and steel construction in the office areas. Office areas are located along the east end and parts of the south end of the main building. Facility personnel did not know if hydraulic equipment is used in elevators in office areas. Outside areas around the main plant are used for parking or storage of parts holing racks. Storm sewer inlets were observed both outside and inside the main plant and office area. The former Meuhlstein Property on the northeast corner of Division Street and Gillette Street is currently entirely paved and used for rack storage.

The southern and central portion of the main plant is used for metal stamping operations. The stamping presses are located above basements. Metal chip handling conveyors are located under the presses and they convey chips to the Baler Building to the north of the main plant. The total basement area is approximately 138,678 square feet. Lubricant and hydraulic oils were observed on the floors and in sumps across the majority of the basements. Oil staining was also observed on walls in several locations. In the east central portion of the basement the Die Wash Sump is located under the Die Wash area. The Die Wash Sump refers to an approximate 15 foot by 15 foot room in the basement with a liquid collection sump in the floor. Liquids are collected in this floor sump and are pumped to the Soluble Oil Storage Tanks (SWMU 8). Site personnel have not heard of chlorinated solvents being used for die washing though they did not know of historical practices.

The Free Oil Treatment System (SWMU 6) is located in the basement. This system has been in use since 1969 and consists of an oil/water separator and a free oil tank. The system collects oily water from the Basement Floor Sumps (SWMU 24). Separated oil is stored in the free oil tank near the separator and water is pumped to the Soluble Oil Storage Tanks (SWMU 8).

The Basement Floor Sumps (SWMU 24) are located throughout the basement area and free oil was observed in many of the sumps. Pumps were located in many of the sumps to pump oily water to the Free Oil Treatment System (SWMU 6), or the Free and Soluble Oil Storage Tanks (SWMU 8).

The Free and Soluble Oil Storage Tanks (SWMU 8) are located on the western end of the basement. This unit is compromised of two 10,000-gallon welded steel tanks. Free oil is stored in one tank and soluble oil is stored in the other tank.

The chip handling system conveys waste metal chips to the Baler Building north of the main building. Oil staining was observed around the chip handling equipment in the Baler Building. A waste oil collection sump is currently located in the Baler Building. The integrity of the sump was not able to be determined. Facility documentation and the GM PA/VSI indicate up to two waste oil collection tanks have historically been present in the Baler Building. Facility personnel report that at least one UST was determined to not need further actions by IDEM. A facility document indicates a possible second UST. This second UST may actually be referring to the current waste oil sump in the Baler Building. Oil stained soil and several small pools of free oil was observed on the ground around the Baler Building. This staining is the result of handling of oily metal chips and from the hydraulic rail car movement equipment.

Sub-assembly has also been performed at the subject site which consisted of welding or gluing stamped metal parts together or welding small fixtures to stamped parts. The assembly areas are generally located to the north of the stamping presses.

Carpenter, millwright, lift-truck repair and other shops are located in the southeast and northeast portions of the main building. Several small parts degreasers are located in these areas. Truck repair lifting is performed by overhead cranes. Facility personnel did not know of any present or former underground hydraulic lifts. The former Executive Car Garage is located in the northeast corner of the main building.

In the north central portion of the main building is the loading area for the conveyor which conveys parts to the distribution warehouse. An oil distribution center is located near this area above the chip conveyor tunnel.

The west end of the main building is generally shipping and receiving docks. Hydraulic dock leveling equipment is located in this area. Waste metal chip bins are in this area with minor staining under and around them.

Paint Mix and Compressor Buildings

The Paint Mix and Compressor buildings are located adjacent to each other north of the main building. No paint mixing activities have occurred in this building since at least the mid 1970s. The subject site's hazardous waste storage pad has been located in the Paint Mix building since at least 1980. A powerhouse building was formerly located to the east of these two buildings. At the time of our site visit several small oil leaks were observed in the compressor room basement. Though minor in nature, two sumps located in the basement may provide a preferential pathway for oils to migrate to soil or groundwater. Several minor oil stains were observed around the oil tanks in the Paint Mix building.

Storage Buildings

The Yard Equipment Repair & Storage Building and the Equipment Storage Shed are located near the northwest corner of the main building. Various facility and manufacturing equipment is stored in these buildings.

Wastewater Treatment Area

The wastewater treatment area is approximately 1.6 acres in size and is located on the northeast corner of the facility property. The area is accessible from White River Parkway Drive South or from a tunnel that leads from the main plant area underneath railroad tracks. The eastern three quarters of the area is covered by structures or is paved with concrete. The western quarter of the area is gravel covered. The wastewater treatment area was reportedly constructed in 1984 and was utilized to treat wastes generated by Electro Painting Operations (ELPO), which were conducted in the main plant. Although the ELPO process was reportedly phase out of service by 1986, several wastewater treatment components remain in this area. These components include the following:

- A two-story (3,694 square foot) treatment building. The building is concrete and metal construction. Major piping components, transfer pumps and a mixing tank remain within the building.
- Two 350,000-gallon metal, exterior, batch mixing, aboveground storage tanks (AST). The tanks are open to the atmosphere and collect precipitation.
- One 50,000-gallon metal, exterior sludge storage AST. This tank is open to the atmosphere and collects precipitation.

Review of a schematic provided by John Chroniak indicates that part of the treatment process involved dewatering solids utilizing a filter press. The location of the filter press is known (on the first floor of the treatment building), however, the actual press has been removed. Because the treatment process has not been utilized since around 1986, the handling procedures and the waste characteristics of the filter press solids could not be ascertained. Effluent from the treatment process, however, was reportedly discharged to the municipal sanitary sewer.

The wastewater treatment area also contains a 350,000-gallon capacity clarifier (date installed unknown) currently utilized as an oil skimmer. Storm water collected throughout the main plant is conveyed to this clarifier where solids are allowed to settle and oil is allowed to collect at the surface. Solids are periodically pumped from the bottom of this structure to an adjacent AST (capacity unknown). An oil skimmer continually rotates at the water surface collecting and conveying the accumulated oil into an adjacent 6,000 gallon concrete UST. Plant personnel reportedly remove the solids and accumulated oil on an as need basis. "Treated" water is conveyed by piping and discharged to the White River.

Two 30,000 gallon diesel fuel USTs were also located in this area. The diesel fuel USTs were reportedly removed from the subsurface in December 1987. No closure samples were known to have been obtained during UST removal activities.

A 200 square foot diesel fuel pump building is also located in this area. The diesel pump building was reportedly utilized to pump diesel fuel to support the ELPO process.

Distribution Center (DC)

The Distribution Center (DC) area is approximately 29 acres in size, contains one 264,428 sq. ft. three story building, and is located on the northeast corner of the facility property. The area is accessible from Harding Street. The majority of this area is covered by structures or is paved with concrete or asphalt. The eastern tenth of the property is gravel covered. The DC building was reportedly constructed in 1986 and is currently utilized to ship components via two rail loading areas (northern and southern) and nine truck loading bays. It is unknown if hydraulics are utilized to position the loading ramp associated with each truck bay. The building is concrete and metal construction.

Finished parts loaded in racks are transferred from the main plant via a mechanized above ground conveyance system to the DC. The racks are stored within the DC on concrete as inventory and are shipped via rail or truck as necessary to fill customer demand.

Parts racks are moved within the DC by the use of a variety of battery powered forklifts. A battery recharging and fork lift repair area is located between the inventory area and the truck shipping bays. Two trench drains are located along the length of the charging/service area. Spilled fluids are conveyed in the trench drain to a single concrete sump. An automated pH meter is reportedly utilized to determine if the materials within the sump can be pumped to the sanitary sewer. The sump was not accessible during the site visit.

Five 55-gallon drums of new or used lubricating oil were located along the southern edge of the battery charging/repair area. The drums were not in secondary containment. Minor staining was noted next to the drums.

Switch House

The Switch House area is approximately 0.45 acres in size, contains one 1,600 square foot single story building, and is located in the central portion of the facility property at the intersection of Division Street and Gillette Street. The area is accessible from Division Street. The majority of the property is an electrical substation owned by Indianapolis Power and Light (IPL). The electrical substation area is covered with gravel, was fenced, and not readily accessible. The Switch House building was reportedly constructed in 1967 and is currently utilized to distribute various voltages of power throughout the main plant. There is no liquid filled electrical equipment in the Switch House. The building is concrete and metal construction and houses a variety of electrical switches and components.

Pump House

The Pump House area is approximately 0.45 acres in size, contains one 914 square foot single story building, and is located on the in the central portion of the facility property at the intersection of Arbor Street and Gillette Street. The area is accessible from Arbor Street. The majority of the Pump House area is covered with asphalt and gravel and is fenced. The pump house building was reportedly constructed in 1979 and is utilized to distribute large quantities of water throughout the main plant in the event of an emergency. The building is concrete and metal construction and houses two emergency diesel powered water pumps and associated piping components. Hydrocarbon adsorbent booms were placed around each pump to collected inadvertent leaks or spills. Diesel fuel is stored inside the building in two 250 gallon above ground storage tanks (ASTs). Piping from the ASTs to each diesel pump is above grade.

One 200,000 gallon AST is located to the west of the pump house building and is utilized to store an emergency supply of potable water.

The southern portion of this area is covered in asphalt and is utilized to store miscellaneous plant related items.

Old Plant 5 Site Area

The Old Plant 5 Site (the Ulrich Chemical property) area is approximately 2.1 acres in size and is located in the central portion of the facility property on the northwest corner of Division Street and Gillette Street. The area is accessible from Division Street. The area formerly housed Old Plant 5 a building that was approximately 25,200 square feet. The Old Plant 5 building was demolished in 1997. After demolition, the concrete floor/foundation and associated asphalt parking areas remained. This area is currently

utilized to store empty parts/component racks until they are needed for the shipping process. The racks, sometimes stacked three and four units high, currently cover the majority of this area, obscuring the ground surface and limiting the visual observation. The area is drained by a series of storm water catch basins.

Old Plant 3 Site Area

The Old Plant 3 Site area is approximately 4 acres in size and is located in the west central portion of the facility property. The area is accessible from Harding Street. The area formerly housed Old Plant 3, a building that was approximately 105,600 square feet. The Old Plant 3 building was demolished in 2000. After demolition, the concrete floor/foundation, the associated asphalt parking areas, and the southern railroad spur remained. The eastern part of this area is currently utilized to store empty parts/component racks until they are needed for the shipping process. The racks, sometimes stacked three and four units high, currently cover the majority of this area, obscuring the ground surface and limiting the visual observation. The western part of the area is utilized as a parking lot. The area is drained by a series of storm water catch basins.

6.1.1 Potable Water Supply and Sewage Disposal System or Septic Systems

The subject site is serviced by Veolia Indianapolis Water. A groundwater production well is located on the subject site that, according to subject site personnel, supplies water for on-site non-potable use.

6.1.2 Use of Petroleum Products and Hazardous Waste Generation

Petroleum products are used extensively throughout the site for lubrication of metal parts and machinery. Hazardous paint waste solvent, aerosol solvent and solvent rags are generated at the site.

6.1.3 Disposal of Petroleum Products and Hazardous Materials

Hazardous waste is transported from the subject site and disposed of by Heritage Environmental.

6.1.4 Odors

No odors indicating RECs were noticed at the time of the site visit.

6.1.5 PCBs Associated with Electrical or Hydraulic Equipment

Facility personnel indicated that liquid filled electrical equipment at the subject site was tested for PCBs and PCBs were found to not be a problem.

6.1.6 Dry Wells

No dry wells were observed or reported by facility personnel to be on-site.

6.1.7 Solid Waste and Evidence of Waste Filling

No evidence of waste filling was observed during the site visit nor from review of historical topographic maps provided by EDR.

6.1.8 Wastewater and Stormwater Discharge

Storm and waste water sewers are present at the site. Storm sewer discharges to the White River and is regulated by a general permit. Waste water is discharged to the City of Indianapolis sanitary sewer system.

6.1.9 Septic Systems

Facility personnel reported that no known septic systems are known to have been present at the subject site.

7 FINDINGS AND CONCLUSIONS

Haley & Aldrich, Inc. (Haley & Aldrich) has prepared this Phase I environmental site assessment (Phase I assessment) of the subject site. The work was performed by Haley & Aldrich in accordance with Motors Liquidation Company authorization to proceed dated 13 April 2010 and our proposal dated 21 April 2010. As indicated in our proposal, this Phase I assessment was performed in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527-05 Standard) as referenced in 40 Code of Federal Regulations (CFR) Part 312 [the All Appropriate Inquiries (AAI) Rule]. Deviations from this Standard, and/or data gaps and their significance are described herein. Our conclusions are intended to help the user evaluate the "business environmental risk" associated with the subject site, as defined in the ASTM E 1527-05 Standard.

The subject site is an approximate 102-acre property currently developed for industrial use with more than 2 million square feet of building under roof. The subject site was first developed in the late 1800's and early 1900's as a woodworking facility that made carriages. The subject site was converted to a metal working operation making complete automobiles before it was acquired by General Motors (GM) in 1936 and since that time has produced metal stamped automotive parts. Sub-assembly that consisted of welding or gluing stamped metal parts together or welding small fixtures to stamped parts has also taken place at the subject site. From 1972 to 1987 parts washing and painting was also performed at the subject site.

The subject site applied for a RCRA Part A permit in 1980 and had a single Hazardous Waste Management Unit (HWMU). In 1991, the HWMU was closed in accordance with applicable regulations and was converted to a less than 90-day Container Storage Area. The subject site recently changed from large quantity generator status to small quantity generator status.

The subject site is located approximately 500 feet west of the White River on a sand and gravel glacial outwash deposit. Building basements intersect the groundwater table. Approximately seven (7) groundwater dewatering wells/pumps are located around the perimeter of the basement areas. These pumps collect groundwater from outside the basement areas and discharge the water to the White River. Within the basement areas numerous sumps collect oil and groundwater which are either pumped to an oil/water separator or are discharged directly to a collection tank. Oil and water from these systems are shipped off-site for treatment and disposal. Although general groundwater flow in the area is likely east toward the White River, due to the dewatering activities and the presence of a dam on the White River, the subject site may actually be downgradient of surrounding areas.

The objective of a Phase I assessment is to identify known and suspect "recognized environmental conditions" (RECs), historical RECs (HRECs), and *de minimis* conditions associated with the subject site, as defined in the ASTM E 1527-05 Standard.

The ASTM E 1527-05 Standard requires an environmental professional's opinion of the potential impacts of RECs, HRECs, and *de minimis* conditions identified on a site during a Phase I assessment. Our opinion is rendered with respect to an REC's potential (high, medium, or low) to require remedial response based on prevailing agency requirements and on our understanding of Motors Liquidation Company's intended use for the subject site. We do not know the further intended use of the subject site. The current use of the subject site remains industrial. Our opinion regarding an REC's potential impact on the subject site (high, medium, low, or unknown) is based on the scope of our work, the information obtained during the course of our work, the conditions prevailing at the time our work was performed, the

applicable regulatory requirements in effect at the time our work was performed, and/or our experience evaluating similar sites, and on our understanding of the client's intended use for the subject site.

Data gaps exist in the scope of work for this Phase I ESA. We have not received responses to our FOIA requests from the U.S.EPA and the IDEM. If, when received, findings from FOIA requests change our opinion regarding RECs at the subject site, we will notify you.

Based on the results of this Phase I Environmental Site Assessment, our findings are as follows:

KNOWN OR SUSPECT RECOGNIZED ENVIRONMENTAL CONDITIONS

The ASTM E 1527-05 Standard defines an REC as "the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property." A material threat is defined by the ASTM E 1527-05 Standard as "a physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the environmental professional, is threatening and might result in impact to public health or the environment." Consistent with ASTM E 1527-05 Section 12.5 (Report Format), and for the purposes of this assessment, those RECs that have been identified as being present with respect to the subject site are referred to as Known Recognized Environmental Conditions (KRECs), and those RECs that have been identified as being likely present with respect to the subject site are referred to as Suspect Recognized Environmental Conditions (SRECs).

This Phase I assessment has revealed evidence of fourteen KRECs or SRECs in connection with the subject site.

Our opinion of the potential impacts of the REC(s) identified in this Phase I assessment is as follows:

Known Recognized Environmental Conditions

KREC #1: AOC A - Former Plant No. 5 Underground Storage Tanks
Potential Impact: Medium
Explanation: The Ulrich Chemical property was purchased by GM in 1982 and that property is now known as former Plant No. 5. The United States Environmental Protection Agencies (USEPAs) Preliminary Assessment/Visual Inspection (PA/VSI) for the Ulrich facility (Ulrich PA/VSI) states the dates of operation of the TCA Tank from 1973 to 1982 and the fuel USTs from 1968 to 1982. Based on IDEM Initial Incident Report in Nov 1986, the gasoline tanks were installed around 1954. Based on UST Notification, 10,000-gallon 1,1,1-TCA tank (1977), 10,000-gallon diesel tank (1976), 10,000-gallon gasoline tank (1978) and 6,000-gallon gasoline tank (1971). Four Underground Storage Tanks (USTs) containing leaded and unleaded gasoline, diesel fuel and 1,1,1-trichloroethane were located on the property at the time of purchase. A 200,000-gallon neutralization tank and a hazardous waste storage area were also located in this area. These USTs were identified in the Ulrich PA/VSI report as Area of Concern A (AOC A). According to the Ulrich PA/VSI, GMC removed the USTs in 1986 and surface soil that was excavated to remove the tanks "showed the possibility of contamination". Based on the findings of this assessment, the possible soil and groundwater impacts have not been investigated.

KREC #2: AOC C - West Gate Spill Area
Potential Impact: Low
Explanation: On 11 June 1986, a 500-gallon gasoline above-ground storage tank was displaced from its moorings and its contents were released to the surrounding soil. Gasoline reportedly made its way into a storm drain along Division Street and some contaminated soil was excavated and disposed off-site. This

area is identified in the PA/VSI for the GM stamping facility (GM PA/VSI) as AOC C. Based on our findings to date, the possible soil and groundwater impacts have not been investigated.

KREC #3: Paint Mix-Oil Stores Area
Potential Impact: Medium
Explanation: The following potential releases were identified in this area:

- AOC E (Oil/Water Mixing Tank Spill Area) – The GM PA/VSI identified an approximate 10,000-gallon release of an oil-water mixture on July 11, 1978 as AOC E. The GM PA/VSI also reported that 100 gallons migrated to the storm water sewer system and 2,000 gallons of the mixture were recovered and sent off-site for disposal. The GM PA/VSI also reported that this area "has a history of minor releases". This area also contains the Former Interim Status Container Storage Area (SWMU 1 in the GM PA/VSI) though no releases have been associated directly to SWMU 1.
- Fuel Oil Tanks – Sanborn maps from 1966 and 1968 show three fuel oil tanks adjacent to, and east of, the former powerhouse. Other than the Sanborn Maps, no information on the tanks (including their capacity, whether they were above- or below-ground, etc.) was found during our assessment. Additionally, at this same location the 1950 and 1956 Sanborn maps show an apparent tank with an undecernable label at the same location of the three fuel oil tanks.
- Ash Slurry UST #8 (SWMU 10) – Facility documents indicate regulated UST #8 was located north of the east end of the former powerhouse. The facility documents indicate the concrete tank had a capacity of 6,000 gallons and was installed in 1956. The facility documents indicate the tank was last used in 1980, and was filled with inert material. Further documentation indicated the tank area was scheduled for soil testing, although no documentation of soil sampling was located.
- Compressor room basement – At the time of our site visit several small oil leaks were observed in the compressor room basement. Though the observable leaks were minor in nature, the two sumps located in the basement may have provided a preferential pathway for oils to migrate to soil or groundwater.

Based on our findings to date, the possible soil and groundwater impacts have not been investigated.

KREC #4: Stamping Operations
Potential Impact: Medium
Explanation: Lubricating oils and hydraulic oils were observed on soil around the Baler Building, on floors, walls and in sumps around the metal stamping presses and associated equipment (including hydraulic compressors and chip handling equipment). This area includes the Free Oil Treatment System (SWMU 6), the Free and Soluble Oil Storage Tanks (SWMU 8) and the Basement Floor Sumps (SWMU 24) identified in the GM PA/VSI. The presence of these oils on floors, walls and in groundwater control sumps indicates a potential release to soil and groundwater. This area covers a large portion of the building area on the subject site. The basement floor sumps are distributed throughout the basements and are connected via piping under the slab.

Oil staining was observed around the chip handling equipment in the Baler Building. A waste oil collection sump is currently located in the Baler Building. The integrity of the sump was not able to be determined. Facility documentation and the GM PA/VSI indicate up to two waste oil collection tanks have historically been present in the Baler Building. Facility personnel report that IDEM indicated no further action was necessary for at least one UST. A facility document indicates a possible second UST is located in the area. This second UST may actually be referring to the current waste oil sump in the Baler Building. In either case, the presence of the current sump and the stained soil indicate a potential release to subject site groundwater and/or soils. Although some investigations have been performed around the Baler Building to delineate impacts of oil, the continued presence of free oil on the ground indicate a continued release.

KREC #5: Building 32 Area Waste Handling Operations and USTs
Potential Impact: Medium
Explanation: The Former CPI Waste Oil Underground Storage Tank (SWMU 4), the Former Rubbish Dock Waste Oil Tank (SWMU 7), the Floor Cleaning Water Holding Tank (SWMU 11), the Waste Treated Pine Floor Block Storage Area (SWMU 18), the Scrap Metal Storage Pit (SWMU 19), the Empty Drum Storage Areas (SWMU 17), current and former trash compactors and scrap metal bins, and dock leveling hydraulic equipment have been, or are currently, located in this area. Information obtained from IDEM indicates that the two former USTs in this area were issued No Further Action letters. Minor leaks and staining was observed around the hydraulic dock leveling equipment, trash compacting equipment and chip collection equipment. The GM PA/VSI reported that the Waste Treated Pine Floor Block Storage Area was located outside on pavement and the investigators observed extensive staining associated with this area (at the time of the GM PA/VSI). No documentation of sampling or remediation activities has been located for this area. Waste floor block is currently stored in the pipe fittings storage building in steel bins. The GM PA/VSI also identified oily residue under the Empty Drum Storage Areas. Facility documentation reports a spill of 340 gallons of oil in this area. A photograph provided with the GM PA/VSI report shows oil along a plant wall and in a storm drain. Although some investigations have been performed around former USTs, based on our findings to date, the possible soil and groundwater impacts have not been fully investigated.

KREC #6: Storm and Waste Water Treatment Facilities and Fuel Oil USTs
Potential Impact: Medium
Explanation: The Industrial Wastewater Treatment Facility (IWTF) (SWMU 14), the Storm Water Treatment Facility (SWTF) (SWMU 15) and two 30,000-gallon fuel oil USTs have been located in this area. Only the SWTF exists today and is operational. According to the GM PA/VSI the IWTF was operational from 1984 to 1988. It received wastewater from the ELPO painting process, the parts washing system and other sources. The system consisted of two 350,000-gallon batch tanks, one 50,000 sludge storage tank, a filter press, a filter cake roll-off between the tanks, and a sump. The sump collected excess water from the filter press operation. No assessment of the integrity of the storage components of this process has been made.

The SWTF consists of a 350,000-gallon clarifier tank for skimming used oil and floatables. The oil and other "floatables" are stored in a 6,000-gallon underground concrete tank. Heavier-than-water particulates settle to the bottom of the tank and are pumped to the storm water sludge tank. This process has been in operation since 1969. No assessment of the integrity of the storage components of this process has been made.

Facility documents indicate that the two fuel oil tanks were removed in 1987. We have not been provided with documentation of tank removal, closure activities, or IDEM status from the facility or IDEM.

KREC #7: Closed in Place Fuel Oil UST
Potential Impact: Medium
Explanation: An 8,000-gallon fuel oil UST was closed in place in 1990. TPH (1,876 ppm) was detected in a soil sample adjacent to the UST. A report submitted to IDEM indicated that bioremediation would be used to address the impacted soil; however, no further information was provided by the facility or IDEM regarding this UST.

KREC #8: Former Meuhlstien Property
Potential Impact: Medium
Explanation: The former Meuhlstien property is located on the northeast corner of Division Street and Gillette Street. This property was acquired by GMC between 1993 and 1997. The Meuhlstien property is

first shown on Sanborn maps as being occupied by the National Wheel Company, a woodworking shop in 1898. In 1915 the National Wheel buildings are shown as vacant. The 1950, 1956, 1966 and 1988 Sanborn maps show the property as being a Reclaimed Rubber Processing Plant. We reviewed a draft Phase III remedial investigation report which indicated impacts from multiple compounds across this area. The impacts were from site operations and from 2 USTs on the property. We did not find a final report documenting remediation of the impacts.

Suspect Recognized Environmental Conditions

SREC #1: AOC D ((West Pump House Spill Area) and UST #16
Potential Impact: Low
Explanation: On 14 January 1988, approximately 20 gallons of diesel fuel was spilled onto soil due to overfilling of a UST near the fire protection pump house. Soil and gravel was excavated at the time of the release. Documentation of delineation of possible soil and groundwater impacts has not been located. UST #16 is a 4,000-gallon diesel fuel tank which was removed in 1988. We did not find documentation of tank removal, closure activities, or IDEM status.

SREC #2: Building 14 Area
Potential Impact: Low
Explanation: SWMUs 12 (the ELPO Paint System Waste Pit), SWMU 13 (the Former Chromic Acid Treatment Tank), and UST #11 were previously located in this area. An oil/water separator and a trench drain were observed in the executive car garage at the time of our site visit. Although there are no known releases in this area, several conditions have been identified that may have lead to a release to the environment. SWMU 12 (the ELPO Paint System Waste Pit), SWMU 13 (the Former Chromic Acid Treatment Tank), and UST #11 (a 120,000-gallon ELPO spill reservoir), all handled waste below grade and the below grade structures that handled these materials were not inspected at the time of their removal to determine the integrity of the structures. The oil/water separator and the trench drain in the executive car garage have not been assessed as to system integrity. No soil or groundwater sampling data has been located for these areas.

SREC #3: USTs 4 and 5
Potential Impact: Low
Explanation: Facility documents indicate a 10,000-gallon diesel fuel UST and an 8,000-gallon leaded gasoline UST south of the southwest corner of the main production building. Facility reports indicate that both were removed in December 1992 by Dennistar (both installed in 1974), and that nine samples were collected for TPH and results indicate concentrations were less than 10 ppm. We did not find documentation of tank removal, closure activities, or IDEM status.

SREC #4: Building 31 Area
Potential Impact: Medium
Explanation: The Standard Oil Company of Indiana is shown on this parcel on Sanborn maps dated 1950, 1956, 1966, and 1968. The operations shown were consistent throughout each of the maps. Oil transfer operations are shown with an oil warehouse, a barrel filling room, a barrel paint room, a warehouse, a pump room, and a pump shed. A five-foot concrete wall is shown on the eastern end of this facility near the pump shed. This wall enclosed an area that we observed on aerial photographs as an area of possible distressed soil. The use of this area is unknown.

During our site visit we observed trench drains and collection sump in the battery re-charge area and hydraulic dock leveling equipment. The condition of the sump and the hydraulic equipment could not be determined.

SREC #5: Surrounding Properties
Potential Impact: Low
Explanation: Much of the surrounding area may be upgradient with respect to groundwater flow because the subject site is between them and the White River and pumping operations on the subject site to control groundwater in basements. The surrounding area is predominated by commercial (i.e. dry cleaners, gas stations, automotive repair facilities) and industrial (i.e. oil refinery, tannery, scrap and salvage operations) sites that may have an impact on the subject site.

SREC #6: Storm Water Sewer System and Retention Basin
Potential Impact: Low
Explanation: The Storm Water Sewer System (SWMU 23) and Retention Basin (SWMU 16) have been identified as receiving several releases throughout the history of the operations including oil, oily water and gasoline. Because the integrity of these sewers is unknown, the storm water sewers may have released contaminants to subject site soils and/or groundwater.

HISTORICAL RECs

The ASTM E 1527-05 Standard defines an HREC as an environmental condition "which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently."

This Phase I assessment has revealed evidence of two HRECs in connection with the subject site.

HREC #1: AOC B – Pipe Fitting Storage Building Spill Area
Potential Impact: Low
Explanation: During a compliance inspection conducted in November 1986, an oily residue was discovered near the pipe fittings storage building next to the north side of the railroad tracks. Soil samples collected of the stained area did not show elevated levels of lead, cadmium or chromium. This area was identified in the GM PA/VSI as AOC B. At the time of the GM PA/VSI, no evidence of the oily residue was present. The GM PA/VSI recommended no further action for this area.

HREC #2: Executive Car Garage UST
Potential Impact: Low
Explanation: A 10,000-gallon gasoline UST located outside the executive car garage was removed in 2002. A letter from IDEM indicates no further action is required regarding this UST.

DE MINIMIS CONDITIONS

The ASTM E 1527-05 Standard defines *de minimis* conditions as those conditions which "do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." The ASTM E 1527-05 Standard notes that "conditions determined to be *de minimis* are not recognized environmental conditions."

This Phase I assessment has revealed no evidence of *de minimis* conditions in connection with the subject site except for the following:

Numerous small stains were observed in areas not identified above. These stains were generally from automobiles in parking areas, oil drips from miscellaneous equipment or from unknown sources and were determined to not be a likely source of action from a regulatory agency or that they would be a risk to human health or the environment.

SUMMARY AND RECOMMENDATIONS

In summary, several RECs were identified during this Phase I assessment for which additional investigation would be necessary to further define the business environmental risk associated with this property. These investigations would include but would not be limited to soil and groundwater sampling.

8 CREDENTIALS

This Phase I assessment report was prepared by Dennis Kreitzburg, Rick Volpi and Beth Vanden Berg, under the direct supervision of Dan Putz and David Hagen, who served as the Project Manager and Officer-in-Charge of this project, respectively. Qualification information for the project personnel is provided below.

DAVID J. HAGEN, CP, CPG
Vice President

Since joining Haley & Aldrich in 1986, Mr. Hagen has participated in a variety of environmental investigations involving the delineation and remediation of soil and groundwater contamination. Project experience and responsibilities includes design and implementation of site assessment and investigation programs, remedial design, remedial construction, landfill siting, RCRA closures, RCRA equivalency demonstrations, brownfield investigations and redevelopment, and hydrogeologic investigations. Responsible for development of site investigation programs, subsurface environmental testing, installation of monitoring systems, groundwater modeling, project management, remedial design, remedial construction management, regulatory compliance, and negotiations with regulatory agencies.

DANIEL R. PUTZ
Project Manager

As an engineer with Haley & Aldrich since 1991, Mr. Putz has been actively involved in project management, technical project issues and project execution. His project management responsibilities have included staff and field supervision, environmental and geotechnical design, report preparation, environmental and geotechnical database development and management, geographic information system development, data analysis and evaluation, construction project change order review and field construction supervision. Mr. Putz has been involved in a wide variety of projects including environmental remediation, Resource Conservation and Recovery Act (RCRA) corrective action projects, Ohio voluntary action projects, New Jersey Department of Environmental Protection (NJDEP) Industrial Site Recovery Act (ISRA) and New York State Department of Environmental Conservation (NYSDEC) hazardous waste projects. His construction monitoring experience has included site health & safety monitoring, trench excavation and compaction, environmental drilling and testing, building construction, compacted fill placement, and in-situ density testing. Mr. Putz has been widely recognized for both outstanding project performance by external clients, as well as Haley & Aldrich management for excellence in Project Management.

DENNIS J. KREITZBURG
Sr. Environmental Geologist

Since joining Haley & Aldrich in January of 1994, Mr. Kreitzburg has contributed to projects involving soil and groundwater contamination delineation and remediation, environmental site assessments, environmental construction and regulatory compliance. Project experience and responsibilities includes: Phase I and Phase II environmental site assessments under Ohio VAP and ASTM guidelines; removal, contamination assessment, clean-up and closure of USTs under Ohio, Kentucky and New York state guidelines; RCRA Facility Investigations, Corrective Measures Studies, Interim Measures Studies and Interim Measures Implementation. Mr. Kreitzburg has performed over 20 ASTM Phase I Environmental Assessments.

RICHARD VOLPI
Senior Hydrogeologist

Mr. Volpi has 22 years of experience in the management, field investigation, reporting and remediation phases of hazardous and non-hazardous waste sites completed under several Federal and State regulatory programs, including CERCLA, Ohio VAP, Michigan Act 201, Pennsylvania Land Recycling Act, and others. Mr. Volpi has conducted or managed more than 125 Phase I Environmental Site Assessment (Phase I) Reports and more than 100 Phase II ESAs. In total, Mr. Volpi has completed professional assignments in over 28 states, as well as in Canada, Mexico and Puerto Rico. Mr. Volpi has conducted hydrogeological investigations, aquifer characterizations and contamination assessments in a variety of technically challenging and complex geological regimes. Mr. Volpi's expertise includes the evaluation of contaminant migration pathways and characteristics, interaction of contaminant plumes and natural systems, and assessment of low-cost remedial alternatives. Further, Mr. Volpi's diverse and extensive professional background includes regulatory compliance evaluation and negotiation, risk/liability identification, and natural attenuation modeling and monitoring. Other areas of expertise include NAPL contamination assessment and remediation.

BETH A. VANDEN BERG, P.G.
Staff Hydrogeologist

As a staff environmental geologist, Miss Vanden Berg is involved in a variety of projects including real estate due diligence assessments, and regulatory compliance activities. She has experience with the Ohio regulations and the ASTM Standard Practice for Phase I Environmental Site Assessments. Miss Vanden Berg has had experience conducting due diligence throughout the United States.

REFERENCES

1. GM Metal Fabricating Division, Plant Layout, February 1, 2010.

2. Haley & Aldrich, Inc., site visit conducted by Dennis Kreitzburg and Rick Volpi of Haley & Aldrich, Inc. on April 19th and 20th, 2010.

3. John Chroniak of General Motors Company, interview with Haley & Aldrich, Inc., April 19, 2010.

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7. EDR Environmental Data Resources, The EDR Radius Map™ with GeoCheck®, April 14, 2010.

8. EDR Environmental Data Resources, Certified Sanborn® Map Report, April 15, 2010.

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10. EDR Environmental Data Resources, The EDR Aerial Photo Decade Package, April 14, 2010.

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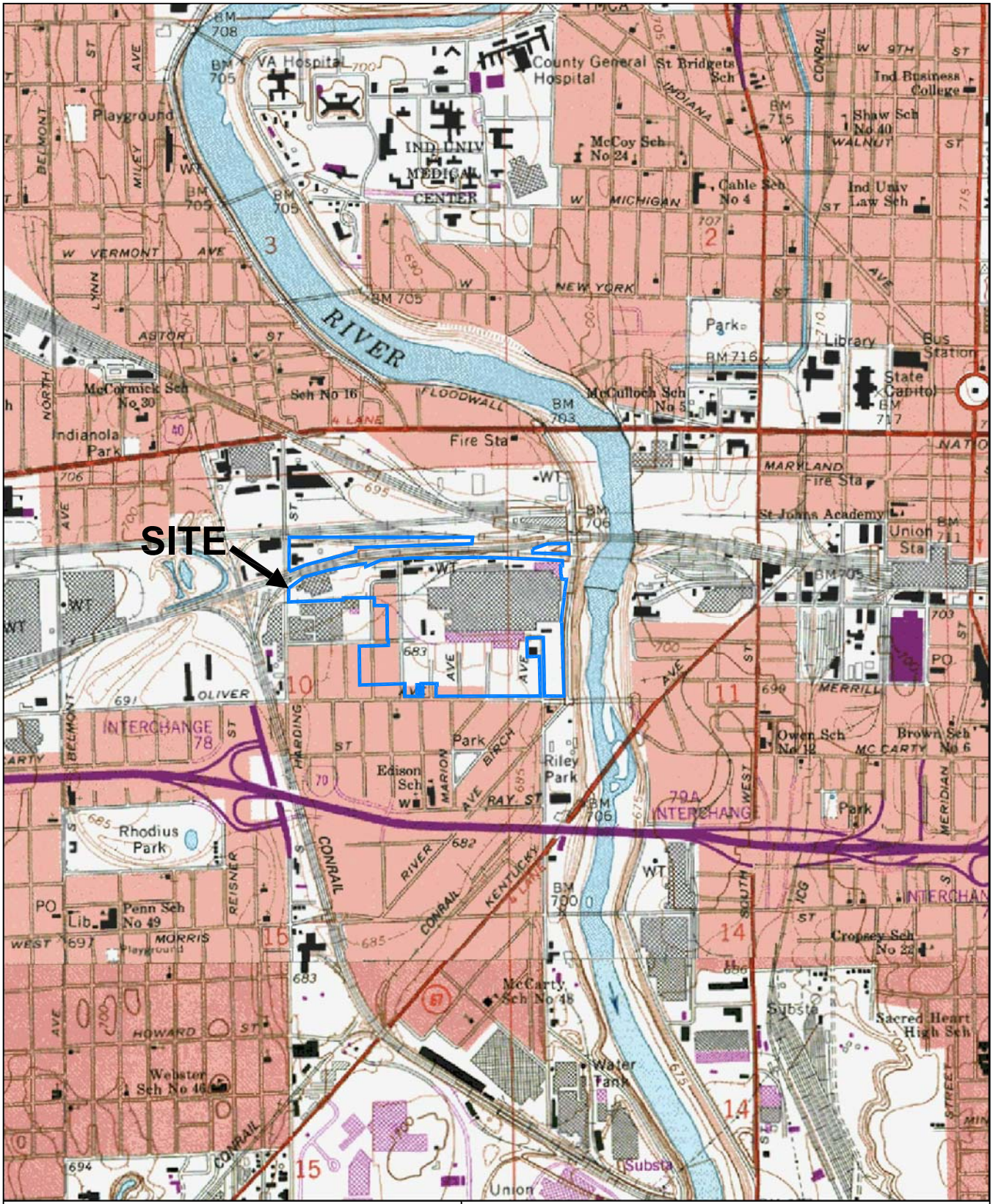
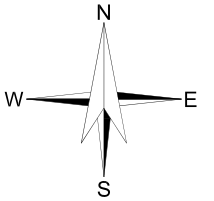
12. Previous reports provided in Appendix F.



SITE COORDINATES: 39°45'42"N 86°10'42"W



U.S.G.S. QUADRANGLE: INDIANAPOLIS WEST, IN

HALEY & ALDRICH

MLC STAMPING - INDIANAPOLIS
340 WHITE RIVER PARKWAY WEST DRIVE SOUTH 50
INDIANAPOLIS, INDIANA

PROJECT LOCUS

SCALE: 1:24000
APRIL 2010

FIGURE 1

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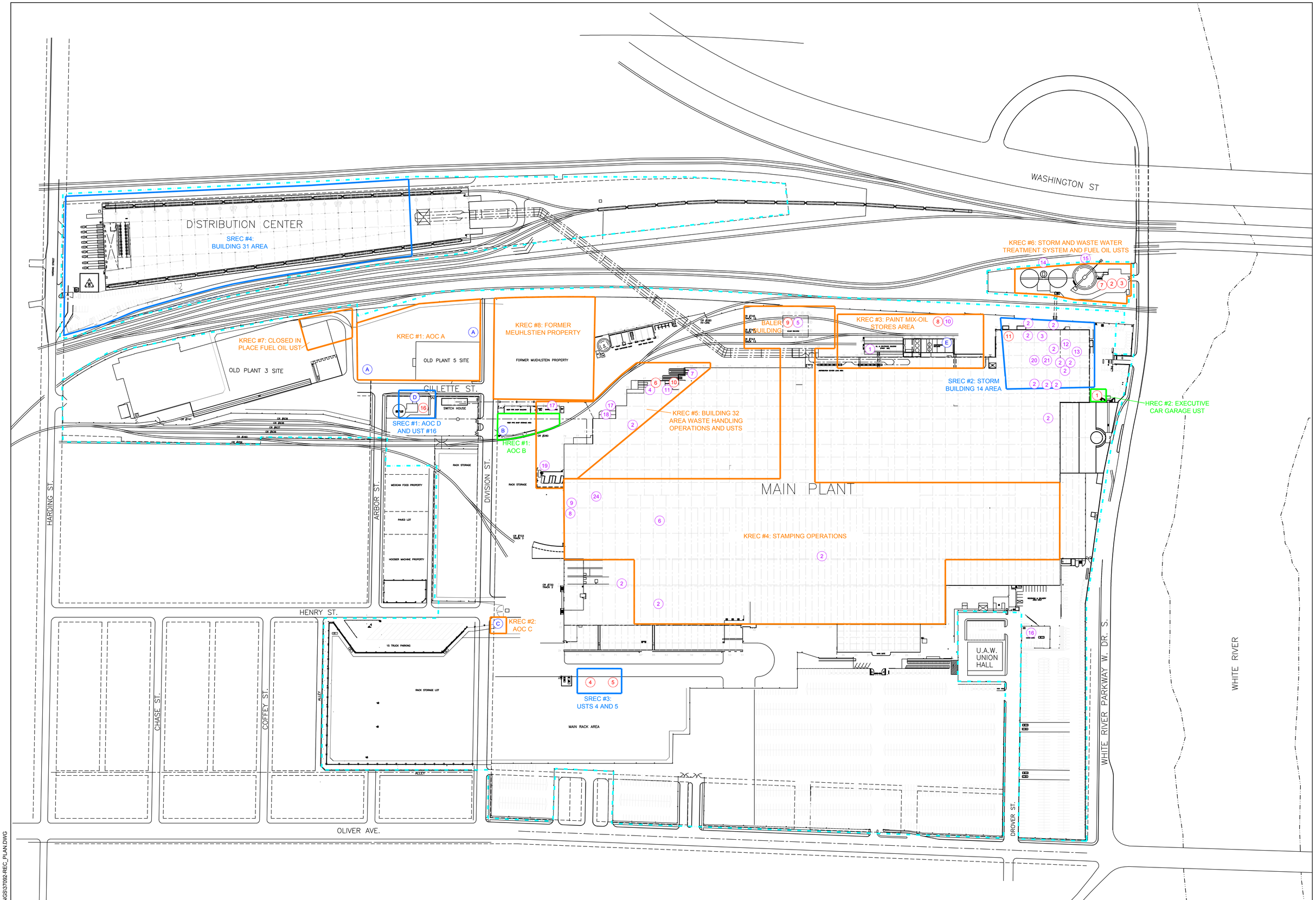

LEGEND:

- APPROXIMATE PROPETY BOUNDARY
- KNOWN RECOGNIZED ENVIRONMENTAL CONDITIONS
- SUSPECTED RECOGNIZED ENVIRONMENTAL CONDITIONS
- HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITIONS
- (2) SWMU'S (SOLID WASTE MANAGEMENT UNIT)
- (A) AOC'S (AREA OF CONCERN)
- (1) CURRENT AND FORMER UNDERGROUND STORAGE TANKS

RECS NOT SHOWN ON MAP:
SREC #6: STORM WATER SEWER SYSTEM AND RETENTION BASIN
SREC #5: SURROUNDING PROPERTIES

SWMU:
1. FORMER INTERIM STATUS CONTAINER STORAGE AREA
2. SAFETY-KLEEN SOLVENT UNITS
3. SPRAY PAINT BOOTH WASTE ACCUMULATION AREA
4. FORMER CPI WASTE OIL UNDERGROUND STORAGE TANK
5. BAILER ROOM WASTE OIL UNDERGROUND STORAGE TANK
6. FREE OIL TREATMENT SYSTEM
7. FORMER RUBBISH DOCK WASTE OIL TANK
8. FREE AND SOLUBLE OIL STORAGE TANKS
9. MOBILE WASTE OIL COLLECTION UNIT
10. ASH SLURRY UNDERGROUND STORAGE TANK
11. FLOOR CLEANING WATER HOLDING TANK
12. ELPO PAINT SYSTEM WASTE PIT
13. FORMER CHROMIC ACID TREATMENT TANK
14. INDUSTRIAL WASTEWATER TREATMENT FACILITY
15. STORM WATER TREATMENT FACILITY
16. STORM WATER RETENTION BASIN
17. EMPTY DRUM STORAGE AREAS
18. WASTE TREATED PINE FLOOR BLOCK STORAGE AREA
19. SCRAP METAL STORAGE PIT
20. FORMER PARTS WASHING MACHINE
21. FORMER ELPO PAINT SYSTEM
22. CONTAINER STORAGE AREA
23. STORM WATER SEWER SYSTEM
24. BASEMENT FLOOR SUMPS

AOC:
A. FORMER PLANT NO. 5 UNDERGROUND STORAGE TANK
B. PIPE FITTING STORAGE BUILDING SPILL AREA
C. WEST GATE SPILL AREA
D. WEST PUMP HOUSE SPILL AREA
E. OIL/WATER MIXING TANK SPILL AREA

CURRENT AND FORMER UNDERGROUND STORAGE TANKS:
UST #1 - 5,000gal - UNLEADED GASOLINE
UST #2 - 30,000gal - FUEL OIL
UST #3 - 30,000gal - FUEL OIL
UST #4 - 10,000gal - DIESEL FUEL
UST #5 - 8,000gal - LEADED GASOLINE
UST #6 - 10,000gal - WASTE OIL
UST #7 - 6,000gal - CLARIFIER SKIMMER HOLDING TANK
UST #8 - 6,000gal - ASH SLURRY
UST #9 - 4,200gal - WASTE OIL
UST #10 - 6,000gal - STRIP TANK DUMP TANK
UST #11 - 120,000gal - ELPO SPILL RESERVOIR
UST #16 - 4,000gal DIESEL FUEL

N W E S

0 100 200 300 400
SCALE IN FEET

HALEY & ALDRICH

MLC STAMPING - INDIANAPOLIS
340 WHITE RIVER PARKWAY WEST DRIVE SOUTH 50
INDIANAPOLIS, INDIANA

SITE PLAN SHOWING RECOGNIZED ENVIRONMENTAL CONDITIONS

SCALE: AS SHOWN
APRIL 2010

FIGURE 2

G:\37092 - INDY METAL CENTER\CAD\DRAWINGS\37092-REC_PLAN.DWG

APPENDIX A

Haley & Aldrich proposal dated 04/21/2010

APPENDIX B

Historical Research Documentation

APPENDIX C

Regulatory Records Documentation

APPENDIX D

Site Photographs

APPENDIX E

Phase I Environmental Pre-Assessment Questionnaire