



Semi-Annual Technical Progress Report July 2019 – December 2019

RCRA Corrective Action - IND 980 700 801
2915 Dr. Martin Luther
King Jr. Boulevard, Anderson, IN
Revitalizing Auto Communities
Environmental Response Trust

Indiana Department of
Environmental Management

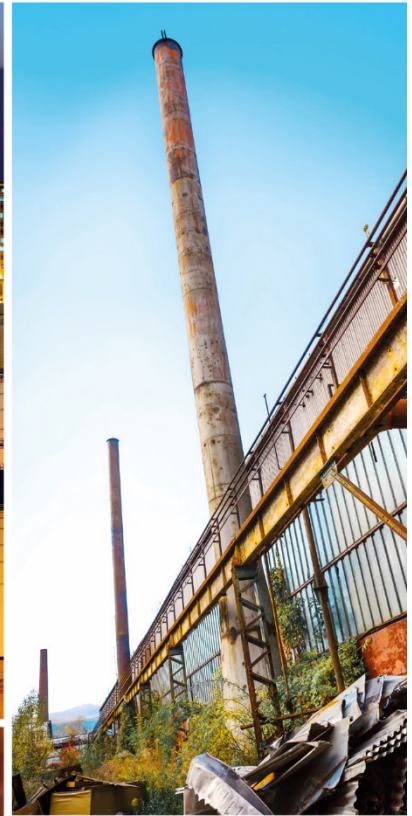




Table of Contents

1.	Introduction.....	1
2.	Summary of RFI, Interim Measures, and Corrective Measures Activities	1
2.1	RCRA Facility Investigation/Environmental Indicators Determination	1
2.2	Interim Measures	1
2.3	Corrective Measures.....	1
3.	Summary of Findings	2
3.1	RCRA Facility Investigation/Environmental Indicators Determination	2
3.2	Interim Measures	2
3.3	Corrective Measures.....	2
4.	Summary of Changes to RFI, Interim and/or Corrective Measures.....	2
5.	Summary of Contacts with Representatives of Local Community, Public Interest Groups, or State Government.....	2
6.	Summary of Problems or Potential Problems	3
7.	Actions Taken To Rectify Problems.....	3
8.	Changes in Personnel.....	3
9.	Projected Work for January through June 2020	3
10.	Reports and Data	4

Appendix Index

Appendix A Project Fact Sheet 28 (January 2020)



1. Introduction

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

This Semi-Annual Technical Progress Report has been prepared to summarize activities related to the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI), Interim Measures (IM) activities, and Corrective Measures (CM) at the Facility for the period of July through December 2019.

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

2.1 RCRA Facility Investigation/Environmental Indicators Determination

There were no RFI activities conducted during this reporting period.

RFI activities are 100 percent complete.

2.2 Interim Measures

Interim measures being conducted at the Site consist of routine groundwater and surface water monitoring and related reporting in accordance with the Site-wide Groundwater Monitoring Plan (AECOM, 2010) and subsequent recommendations made in the 2011 through 2019 Annual Groundwater Monitoring Reports. On June 10, 2019, the Indiana Department of Environmental Management (IDEM) provided comments on the 2018 Annual Groundwater Monitoring Report recommending that groundwater monitoring shift from semi-annual to sampling every 18 months. As such, the July surface water sampling and the October semi-annual groundwater monitoring events were not conducted in 2019. The next scheduled Site-wide groundwater and surface water monitoring event is scheduled for October 2020.

Interim measures are ongoing.

2.3 Corrective Measures

To support development of a revised Corrective Measures Proposal, Meadowbrook Golf Course surface water and select monitoring wells (MW16, MW 29, MW 46, MW 49, MW 59, MW 84, and MW 92-13) were sampled between October 8 and 17, 2019.

To support development of a revised Corrective Measures Proposal, an Evaluation of the Meadowbrook Golf Course Pond Surface Water Analytical Data was completed and provided to IDEM on December 17, 2019. The objective of the evaluation was to assess the Meadowbrook Golf Course Pond surface water analytical data and to evaluate the current and future use of the pond water for irrigation or other non-potable purposes.



The Environmental Restrictive Covenant for Tract B (Central) was executed by RACER Trust on September 13, 2019 and recorded on October 2, 2019. The purpose of the Environmental Restrictive Covenant is to ensure residual contamination at the Site does not pose an unacceptable risk to future on-Site receptors.

3. Summary of Findings

3.1 RCRA Facility Investigation/Environmental Indicators Determination

There were no RFI activities conducted during this reporting period.

3.2 Interim Measures

There were no interim measures conducted during this reporting period.

3.3 Corrective Measures

The results of the October groundwater and surface water monitoring event will be provided through submittal of the 2019 Annual Groundwater Monitoring Report to IDEM on or before January 31, 2020.

The results of the Evaluation of the Meadowbrook Golf Course Pond Surface Water Analytical Data indicates that there is not a current risk to ecological or human health by using the pond water for irrigation or other non-potable purposes.

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

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

As discussed in Section 2.2, routine groundwater and surface water monitoring will now be conducted every 18 months. A revised long term ground water monitoring program will be provided as part of the revised Corrective Measures Proposal that will be prepared in 2020.

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

The Bedrock Groundwater Investigation Report of Findings was submitted to IDEM on March 19, 2019. On July 1, 2019, IDEM provided comments on the Report. On August 20, 2019, on behalf of RACER Trust, GHD submitted a response to IDEM's comments. On September 10, 2019,



IDEM stated that the response to comments were acceptable and addressed IDEM's questions on the report.

The Environmental Restrictive Covenant for Tract B (Central) was executed by RACER Trust on September 13, 2019 and recorded on October 2, 2019.

On September 13, 2019, the Tract B (Central) portion of the Site was sold to Sirmax North America Inc.

On June 10, 2019 IDEM provided comments on the 2018 Annual Monitoring Report RCRA Corrective Action (GHD, January 31, 2019) stating that the 2018 groundwater monitoring program was in compliance with the Site-Wide Groundwater Monitoring Plan and proposing that site sampling shift from semi-annual to every 18-months. On August 20, 2019 on behalf of RACER Trust, GHD submitted a response to IDEM's comments agreeing on the proposed revisions to the ground water monitoring plan, proposed a revised reporting schedule, and recommended a revised long term groundwater monitoring program be part of the Corrective Measures Proposal. On October 1, 2019, IDEM stated that they agreed with the response to comments and the proposed next steps for the project.

On December 13, 2019, the 2020 Budget Request was submitted to IDEM.

6. Summary of Problems or Potential Problems

During construction activities at the Tract B (Central) property in October 2019, monitoring wells MW 50 and MW 51 were covered with approximately 2 feet of fill.

7. Actions Taken To Rectify Problems

On October 28, 2019 the two monitoring wells were located using a professional surveyor. Due to the backfilling activities, monitoring well MW 51 was damaged beyond repair. On November 1, 2019 GHD retained Midway Services Inc., a licensed driller in the state of Indiana, to decommission monitoring wells MW 50 and MW 51. The two monitoring wells were decommissioned as they were in the area of a proposed building. The replacement of the two monitoring wells will be evaluated as part of the Corrective Measures Proposal that will be completed in 2020.

8. Changes in Personnel

There were no changes to personnel during the reporting period.

9. Projected Work for January through June 2020

Projected work for January through June 2020 includes the following:

- Preparation and submittal of the 2019 Annual Groundwater Monitoring Report



- Preparation and submittal of the Revised Corrective Measures Proposal
- Disposal of investigative derived waste

10. Reports and Data

The Semi-Annual Technical Progress Report January 2019 – June 2019 was submitted to IDEM on July 31, 2019.

The Evaluation of Meadowbrook Golf Course Pond Surface Water Analytical Data was submitted to IDEM on December 17, 2019.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 28 (January 2020) submitted with this Semi-Annual Technical Progress Report as Appendix A.

Appendices

Appendix A

Project Fact Sheet 28 (January 2020)



Revitalizing Auto Communities Environmental Response Trust

Project Fact Sheet 28 | January 2020 | www.racertrust.org

RCRA CORRECTIVE ACTION REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST

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

INTRODUCTION

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

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

SITE BACKGROUND

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

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



PROJECT FACT SHEET

Key documents that have been submitted to U.S. EPA and IDEM and are available for review in the public repository. The following documents have been submitted since 2008:

- Corrective Measures Plan, March 31, 2008
- Site-Wide Groundwater Monitoring Plan, March 31, 2008
- Notification to IDEM of a new potential contaminant source area, September 5, 2008
- Progress Reports from 1998 to present
- Annual Groundwater Monitoring Reports for 2008 to 2019
- Vapor Intrusion Study Work Plan, July 2010
- Residential Vapor Intrusion Assessment Work Plan, September 1, 2011
- Investigation Work Plan, September 2, 2011
- Vapor Intrusion Study Work Plan Implementation – Technical Memorandum, November 3, 2011
- Residential Vapor Intrusion Assessment Technical Memorandum, March 7, 2012
- Supplemental RFI Results Technical Memorandum, March 7, 2012
- Soil and Perched Groundwater Delineation Work Plan, June 26, 2012
- Wastewater Treatment Plant Source Area Investigation Work Plan, January 4, 2013
- Perched Groundwater Investigation Work Plan, April 3, 2013
- Revised Risk Assessment Approach Letter, April 26, 2013
- Wastewater Treatment Plant Source Area Investigation Technical Memorandum, July 31, 2013
- Revised Risk Assessment Interim Deliverable, August 9, 2013
- Wastewater Treatment Plant Groundwater Investigation Work Plan, September 27, 2013
- Refined Human Health Risk Assessment and Derivation of Site-Specific Risk-Based Screening Levels, October 2013
- Refined Human Health Risk Assessment – Addendum, May 12, 2014
- Perched Groundwater Investigation Report of Findings, May 12, 2014
- RFI Final Report, June 2014
- Residential Well Sampling Work Plan, October 23, 2014
- Revised South Court Soil Investigation and WWTP Plume Boundary Well Installation Work Plan, November 14, 2014
- Wastewater Treatment Plant Groundwater Investigation Report of Findings, March 26, 2015
- City Beautification of Anderson Parking Lot Memorandum, June 1, 2015
- South Court Soil and WWTP Plume Boundary Investigation Report of Findings, June 4, 2015
- Supplemental Analysis in Support of the CMP, August 12, 2015
- Chromium and Hexavalent Chromium Groundwater Data Memorandum, September 23, 2015
- Refined Human Health Risk Assessment – Addendum 2, February 2, 2016
- Chromium Groundwater Investigation Work Plan, March 9, 2016
- Chromium Groundwater Investigation Report of Findings, August 3, 2016
- Request for Reduction of Progress Reporting, February 24, 2017
- Residential Well Sampling Report of Findings, December 7, 2017
- Bedrock Groundwater Investigation Work Plan, May 8, 2018
- Former Plant 6 and Plant 9 Soil Vapor Investigation Work Plan, January 22, 2019
- Bedrock Groundwater Investigation Report of Findings, March 19, 2019
- Former Plant 6 and Plant 9 Soil Vapor Investigation Report of Findings, June 17, 2019
- Evaluation of Meadowbrook Golf Course Pond Surface Water Analytical Data, December 17, 2019

RCRA CORRECTIVE ACTION

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

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

IDEM issued a Notice of Corrective Action Complete for Tract B (North) detailing IDEM's Final Decision, stating that RACER Trust has fulfilled its obligations under Indiana's RCRA Corrective Action Program for the parcel of land.

RCRA FACILITY INVESTIGATION

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

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

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

levels. The Refined Human Health Risk Assessment, coupled with the Addendum, was approved by IDEM on May 19, 2014.

RFI activities are 100-percent complete.

COMPLETED INTERIM MEASURES

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

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

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

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

CORRECTIVE MEASURES

A draft Corrective Measures Proposal was submitted to IDEM in March 2008. A revised corrective measures proposal is being prepared as necessary incorporating the results of activities completed since the time the initial proposal was submitted, including a revised Human Health Risk Assessment and additional investigations. Environmental Restrictive Covenants for Tract A, Tract B (North), Tract B (Central), Tracts C to F, Crawford Field, Lot 1 and former Plant 9 have been completed, approved by IDEM and recorded.

REDEVELOPMENT

RACER Trust is currently marketing portions of the Site for redevelopment. On April 1, 2015, the northern portion of the former main manufacturing building area, Tract B (North), was sold to GDI Construction. RACER Trust donated Tracts C to F and Crawford Field to the City of Anderson on September 14, 2015. Lot 1 was sold on July 6, 2016 to Tower Anderson, LLC. The central portion of the former main manufacturing building, Tract B (Central), was sold on September 13, 2019 to Sirmax North America Inc.

UPCOMING ACTIVITIES

Routine groundwater and surface water monitoring and reporting is ongoing. A revised Corrective Measures Proposal is in the process of being completed.

PUBLIC PARTICIPATION

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

Anderson Public Library

111 East 12th Street
Anderson, IN 46016
Tel: (765) 641-2450

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

CONTACT INFORMATION

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about GHD

GHD is one of the world's leading professional services companies operating in the global markets of water, energy and resources, environment, property and buildings, and transportation. We provide engineering, environmental, and construction services to private and public sector clients.

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