



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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Mr. David Favero  
Favero Geosciences  
1210 South 5<sup>th</sup> Street  
Springfield, IL 62703

November 24, 2010

Dear Mr. Favero:

Re: Approval of Site-Wide Groundwater  
Monitoring Plan  
Motors Liquidation Company  
Dr. Martin Luther King Jr. Boulevard Facility  
Anderson, Madison County  
IND980700801

The Indiana Department of Environmental Management (IDEM) has received the *Site-Wide Groundwater Monitoring Plan (GWMP)* for Motors Liquidation Company's Dr. Martin Luther King Jr. Boulevard site, dated October 28, 2010. The GWMP has been reviewed and is hereby approved with the enclosed modifications and/or clarifications.

If you have any questions regarding this matter, please call (800) 451-6027, press 0, and ask for Mr. Robert Marshall at extension 2-4534, or call 317/232-4534.

Sincerely,

Victor P. Windle, Chief  
Hazardous Waste Permit Section  
Permits Branch  
Office of Land Quality

REM  
Enclosure

cc: Namrata Patel, IDEM (w/ enclosure)  
Harold Templin, IDEM (w/ enclosure)  
Michael Anderson, IDEM (w/ enclosure)  
File IB3e

Modifications to the Site-Wide Groundwater Monitoring Plan  
Motors Liquidation Company  
Dr. Martin Luther King Jr. Boulevard Facility  
Anderson, Madison County  
IND980700801

1. Clarification of the use of the Field Method Guidelines (FMG) must be addressed in the Sampling and Analysis Plan (SAP). This comment was in reference to FMG 6.4, where it states that suction, peristaltic, and Waterra type pumps can be used for the collection of ground water samples. It is recommended that the last paragraph of Section 3.3.3 be modified to include the statement that peristaltic and Waterra type pumps will not be used for the collection of ground water samples.
2. The IDEM acknowledges that there are two main sources for the VOC plumes at the site. However, with the removal of the main building, there are possible new sources for dissolved metals to be carried by the ground water. The IDEM is unaware of site-specific criteria set for the screening of the dissolved metals in the ground water. It is recommended that Section 4 be modified to include a statement that the dissolved metals data will be compared to the drinking water standard found at 327 IAC 2-11.
3. The intent of Comment #5, from the IDEM's October 1, 2010 letter, was to point out the fact that IDEM staff would be evaluating the adequacy of the monitoring system to characterize the plume's behavior. This evaluation is based on having at least two monitoring wells in the source area, which are along the centerline of the plume. In addition, staff agrees that the assessment of the plume behavior during remediation is helpful to identify the efficiency of the remediation system. However, for demonstrating that no further action is needed, the plume behavior must be based on the natural conditions.
4. IDEM staff acknowledges that the annual ground water reports have recorded a surface water elevation of the pond at Culvert 1. However, the GWMP does not state that surface water elevation of the pond will be taken when samples are collected from the pond. The plan should be modified at Section 3.3.1 to include the measurement of the elevation of the surface water at the Meadowbrook Golf Course during each semi-annual sampling event.
5. There are significant uncertainties in the behavior of the identified plumes emanating from this site. Listed in the IDEM's October 1, 2010 letter, the South Court plume has the potential to migrate into the northwest or eastern residential areas. On its present course, the South Court plume will mingle with the wastewater treatment plant (WWTP) plume, which would change the evaluation of the WWTP plume. In the IDEM's November 5, 2010 letter, regarding the review of the *2009 Annual Groundwater Report*, the concern was raised on the inability to adequately determine the ground water flow direction in the bedrock aquifer. The IDEM recommends that Section 3.2.3 of the GWMP be modified to state that measurement of water levels in all accessible site monitoring wells will be included annually, during the fall sampling event.