

Trenton Interior and Lighting Plant

Site Location: Trenton, NJ

The Trenton Interior and Lighting Plant ("Site") is located in Trenton, Mercer County, New Jersey. The Site includes approximately 84 acres of land in an area of mixed industrial, commercial and residential properties. The Site location is shown in Figure 1.

Site Operations:

The manufacturing facility was built in 1938 for the production of automotive body hardware, including door handles, seat adjusters, body moldings, and window components. (See Figure 2 for a former Site Layout). Avenger torpedo bombers were built at the facility during World War II. The manufacturing facility encompassed approximately 1 million square feet prior to its demolition in 1998. All above-grade structures have been demolished. (Demolition costs are not included in this analysis.)

Regulatory History:

In February 1996, GM and the NJDEP executed a Memorandum of Agreement (MOA) under which GM agreed to conduct additional RI activities at the Site. GM initiated additional site investigations in 1997 under the New Jersey Industrial Site Recovery Act (ISRA).

Past Response Actions:

GM performed a Preliminary Assessment (PA) to identify areas of concern, and submitted it to the NJDEP in May 1997. A site inspection was conducted by the NJDEP in June 1997. From 1998 to 2003, GM conducted remedial investigation activities.

In 1996, ninety-eight drums containing barium chromate solution and paint thinner were removed from the Barium Chromate Drum Disposal Area located near the eastern border of the Site.

Current Environmental Issues and Future Remedial Actions:

The December 2003 RI report characterizes current conditions in each of the eleven investigation areas of the Site. The data obtained in the RI indicate that certain metals (including arsenic, chromium, copper, lead, nickel, and zinc), chlorinated VOCs, and petroleum hydrocarbons are found in groundwater at concentrations that exceed the New Jersey Ground Water Quality Criteria (GWQC). Some of the constituents that exceed the groundwater criteria are also found in soils at levels that exceed the New Jersey Impact to Ground Water Soil Cleanup Criteria (IGW SCC).

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Based on these results, future remedial action at the Site could involve the following activities:

- Continued studies and investigations to complete the ISRA process. These investigations would address subsurface conditions under foundations that have not been previously investigated and additional groundwater investigations proposed in the RI report.
- Establishment of deed restrictions to address exceedences of New Jersey soil cleanup criteria for impacted soils left in place and a Classification Exception Area for the observed impacts to groundwater.
- Excavation and off-site disposal of impacted soils and sediments. Other portions of the Site may be capped as an engineering control to mitigate direct contact.
- Groundwater extraction and treatment (for VOCs and metals) in the overburden and the shallow bedrock.
- Implementation of a long-term groundwater monitoring program.

GM Share:

In 2003, GM negotiated a settlement with the United States to recover approximately \$1.4 million, net of legal fees, in connection with the federal government's historic involvement at the Site.

Remediation Costs:

From 1991 through December 2003, General Motors has incurred approximately \$7.2 million in past costs.

GM's exposure to potential future costs for environmental remediation at the Site is estimated to be approximately \$20 million¹, as shown in Attachment C.

¹ Future costs presented here in nominal dollars (includes price inflation).

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Attachment A: Site Figures

Figure 1 – Site Location Map

Figure 1 – Site Layout

Attachment B: Ongoing, Planned and Potential Future Remedial Actions

Attachment C: Supporting Cost Schedules

Attachment D: Information Sources

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**ATTACHMENT A
SITE FIGURES**

Trenton Interior and Lighting Plant**ATTACHMENT B
ONGOING, PLANNED AND POTENTIAL
FUTURE REMEDIAL ACTIONS**

Area	Remedial Actions
Site investigations and reports	Additional site investigations and reports will be prepared to complete the ISRA process and address the relevant NJDEP regulations.
Soils	Excavation and off-site disposal: • The excavated areas will be backfilled and covered by an asphalt cap. • An asphalt cap may also be installed as an engineering control in areas where soils that exceed NJDEP soil cleanup criteria are left in place. • Deed restrictions will be recommended to minimize the extent of excavation and capping required.
Groundwater	Remediation of groundwater: • Removal of on-site source materials (impacted soils); • Establishment of a Classification Exception Area; • Installation and operation of a groundwater extraction and treatment system (operated for 10 years); and, • Development and implementation of a long-term groundwater monitoring program (operated for 30 years).

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**ATTACHMENT D
INFORMATION SOURCES**