



**QUARTERLY TECHNICAL PROGRESS REPORT
OCTOBER 2010 – DECEMBER 2010
RCRA CORRECTIVE ACTION
IND 980 700 801**

**2915 DR. MARTIN LUTHER KING JR. BOULEVARD
MOTORS LIQUIDATION COMPANY, ANDERSON, INDIANA**

**Prepared For:
Indiana Department of Environmental Management**

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1.0 INTRODUCTION

Conestoga-Rovers and Associates (CRA), on behalf of Motors Liquidation Company (MLC), has prepared this Quarterly Technical Progress Report for the MLC Facility located at 2915 Dr. Martin Luther King Junior Boulevard in Anderson, Indiana (Facility or Site). This Quarterly Technical Progress Report has been prepared to summarize activities related to the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI), Interim Measures activities, and Corrective Measures (CM) at the Facility for the period of October through December 2010.

2.0 SUMMARY OF RFI, INTERIM MEASURES, AND CORRECTIVE MEASURES ACTIVITIES

2.1 RCRA FACILITY INVESTIGATION/ENVIRONMENTAL INDICATORS DETERMINATION

RFI activities conducted during this reporting period are related to the Indiana Department of Environmental Management's (IDEM's) comments on the Final RFI Report (EarthTech and ENVIRON, September 2007) and several comment response documents between MLC (formerly known as General Motors Corporation) and IDEM. The remaining item to be addressed includes further evaluation of the potential risk due to groundwater volatilization to indoor air.

Revisions to the RFI Report related to toxicity are ongoing and anticipated to be completed in early 2011. These revisions are in response to related comments provided in IDEM's letter to Mr. David Favero dated October 27, 2009. The RFI activities are considered 95-percent complete.

2.2 INTERIM MEASURES

On October 28, 2010, AECOM submitted the revised Site-Wide Groundwater Monitoring Plan (AECOM, July 2010) in response to the October 1, 2010 Notice of Deficiency (NOD) received from IDEM. The objectives of the groundwater monitoring program are to evaluate the effectiveness of corrective measures (CM) for groundwater, once implemented, monitor the stability of the two volatile organic compound (VOC) plumes, and evaluate metals impacts to groundwater, if any, since initially evaluated as part of the RFI.

In October 2010, groundwater monitoring was conducted in accordance with the Site-Wide Groundwater Monitoring Plan. Activities included:

- Installation of three monitoring wells along the north and east property boundary of former Plant 9
- One-time Site-wide hydraulic monitoring at all accessible monitoring wells
- Routine surface and groundwater sampling for VOC analyses
- One-time groundwater sampling for metals analyses

On November 8, 2010, MLC received IDEM's comments on the 2009 Annual Groundwater Monitoring Report submitted by AECOM, summarizing the groundwater and surface water activities performed in 2009 in accordance with the draft Site-Wide Groundwater Monitoring Plan (AECOM, March 2008). IDEM requested clarification on the field sampling for ferrous iron, the methodology used to generate iso-concentration plots, the methodology used to determine the direction of groundwater flow in the bedrock aquifer, and the need to evaluate trends benzene, toluene, ethylbenzene, and xylene (BTEX) parameters. A response to IDEM comments was prepared by MLC and its consultants and submitted to IDEM in January 2011.

Other interim measures activities, as described in the draft Corrective Measures Proposal (CRA, March 2008) are considered 100-percent complete.

2.3 CORRECTIVE MEASURES

No corrective measures activities were conducted during this reporting period. With the exception of submittal of the draft Corrective Measures Proposal, the corrective measures activities have not commenced and are considered 0-percent complete.

3.0 SUMMARY OF FINDINGS

Interim groundwater monitoring and reporting is ongoing. The results of the Site-wide groundwater monitoring activities conducted in October 2010 will be submitted with the 2010 Annual Groundwater Monitoring Report due to IDEM on January 31, 2011.

4.0 SUMMARY OF CHANGES TO RFI, INTERIM AND/OR CORRECTIVE MEASURES

In correspondence to IDEM dated January 28, 2010, MLC agreed to modify the Final RFI Report as requested in IDEM's 13 comments on toxicity criteria dated October 27, 2009. It is anticipated that the requested revisions to the Final RFI Report will be submitted to IDEM in the first quarter of 2011.

Based on the October 1, 2010 NOD received from IDEM, MLC has modified the Site-Wide Groundwater Monitoring Plan. The revised Site-Wide Groundwater Monitoring Plan was submitted to IDEM on October 28, 2010.

5.0 SUMMARY OF CONTACTS WITH REPRESENTATIVES OF LOCAL COMMUNITY, PUBLIC INTEREST GROUPS, OR STATE GOVERNMENT

On October 1, 2010, MLC received a NOD from IDEM related to the August 13, 2010 revised Site-Wide Groundwater Monitoring Plan.

Ongoing communications with the City of Anderson (City) personnel regarding a Right-of-Way Permit and related maintenance bond for wells on City property.

Communication with the owner of former Plant 9 is ongoing, related to the pending vapor intrusion investigation anticipated to be completed in the first quarter of 2011.

Communication with IDEM related to past costs, cash forecasts, and the November-December 2010 and 2011 Budget Authorization Requests is ongoing. The November-December 2010 Budget Authorization Request (Nov-Dec 2010 Request) was provided to IDEM on October 26, 2010, and the 2011 Budget Authorization Request (2011 Request) for the Site was provided to IDEM on December 10, 2010. Representatives of IDEM, MLC, and CRA participated in a conference call on January 6, 2011 to discuss IDEM's comments on their initial review of the 2011 Request. IDEM's written comments on the 2011 Request were received by MLC on January 10, 2011. MLC provided written responses to IDEM's January 10, 2011 comments and a revised 2011 Request on January 19, 2011.

6.0 SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS

With the exception of IDEM's January 20, 2011 approval to finalize the 2010 Annual Groundwater Monitoring Report and to implement the field activities associated with the Vapor Intrusion Study Work Plan, approval of the Nov-Dec 2010 Request and the 2011 Request are pending.

7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS

MLC and its consultants will continue to respond to IDEM's requests/comments regarding the Nov-Dec 2010 Request and the revised 2011 Request and/or discuss the strategy for the Site with IDEM at their earliest opportunity.

8.0 CHANGES IN PERSONNEL

Though there were no changes to personnel during the reporting period, it is noted that MLC's headquarters have moved to the following address:

401 S. Old Woodward, Suite 370
Birmingham, MI 48009

MLC's Project Manager's address is not affected by this change.

9.0 PROJECTED WORK FOR JANUARY THROUGH MARCH 2011

Projected work for January through March 2011 includes the following:

- Preparation and submittal of responses to IDEM's requests/comments regarding the Nov-Dec 2010 Request and the revised 2011 Request
- Preparation and submittal of the 2010 Annual Groundwater Monitoring Report
- Preparation and submittal of revisions to the Final RFI Report to address IDEM's October 27, 2009 comments on toxicity
- Implementation of the Vapor Intrusion Study Work Plan

10.0 REPORTS AND DATA

The Quarterly Technical Progress Report for July through September 2010 was submitted to IDEM on October 28, 2010.

The revised Groundwater Monitoring Plan was submitted to IDEM on October 28, 2010.

The validated groundwater and surface water data generated during this reporting period will be submitted with the 2010 Annual Groundwater Monitoring Report.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 10 (January 2011) submitted with this Quarterly Technical Progress Report as Appendix A.

APPENDIX A

FACT SHEET 10 - JANUARY 2011

RCRA CORRECTIVE ACTION MOTORS LIQUIDATION COMPANY 2915 Dr. Martin Luther King Jr. Boulevard (Formerly Pendleton Avenue) ANDERSON, INDIANA

INTRODUCTION

Motors Liquidation Company [formerly known as General Motors Corporation (GM)] 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 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 result of GM's June 2009 bankruptcy, certain operating assets of GM were sold to a newly formed company, which is now known as General Motors LLC. Existing, non-continuing assets remained the property of "old" GM, which is now known as Motors Liquidation Company (MLC), in its capacity as a debtor-in-possession in the bankruptcy case. Portions of the Site were historically sold to other companies. The portions of the Site not sold by (old) GM remain the property of MLC.

ENVIRONMENTAL RESPONSE TRUST

In October 2010, the U.S. Government announced that MLC has agreed to resolve its liabilities under the Comprehensive Environmental Response, Compensation and Liability Act, the Resource Conservation and Recovery Act, and the Clean Air Act at 89 sites. The bankruptcy settlement is setting up an Environmental Response Trust to conduct, manage, and fund cleanup at 89 MLC owned sites where MLC has liabilities, including the 2915 Dr. Martin Luther King Jr. Boulevard (formerly Pendleton Avenue) facility.



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 2005:

- Interim Measures Work Plan for South Court Area, March 21, 2005
- RCRA Facility Investigation Stage II Data Report, March 30, 2005
- RCRA Facility Investigation Report, August 12, 2005
- Documentation of Environmental Indicators Determination, September 20, 2005
- Interim Site-Wide Groundwater Monitoring Plan, September 20, 2005
- Interim Measure Work Plan - Production Well Abandonment, July 27, 2006
- 2006 Annual Groundwater Monitoring Report, January 31, 2007
- Response to IDEM's Comments on Final RFI Report, April 5, 2007
- Revised Final RFI Report and Response to IDEM's Comments, September 27, 2007
- Production Well Abandonment Memo, November 16, 2007
- 2007 Annual Groundwater Monitoring Report, January 31, 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 covering February 1998 through September 2009
- 2008 Annual Groundwater Monitoring Report, February 2009
- 2009 Annual Groundwater Monitoring Report, July 2010
- Vapor Intrusion Study Work Plan, July 2010

RCRA CORRECTIVE ACTION

MLC 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 RCRA Facility Investigation (RFI) that is designed to identify and address any significant risks to human health or the environment resulting from the release of hazardous waste or hazardous constituents to environmental media such as soil or groundwater. The scope of the RFI and required cleanup work has been and will continue to be reviewed with IDEM. The activities will be conducted according to standards that are protective of human health and the environment.

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

RCRA FACILITY INVESTIGATION

RFI activities have been completed at the Site. The purpose of an RFI is to investigate any areas of the Site that may need further action and to determine what additional steps might be appropriate. The results of these investigations were documented in reports that have been submitted to IDEM and copies are available for review in the information repository at the local library. MLC has provided responses to IDEM comments on the Final RFI Report, the latest of which were provided to IDEM in January 2010 agreeing to conduct a vapor intrusion study at the Site.

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 sampling conducted in December 2004 identified that the TCE concentrations were highest in an area of approximately 20 x 35-feet.

Soil was excavated from the 20 x 35-foot area, to the depth of the perched water table at approximately 8 feet below ground. The soil was temporarily staged in rolloff boxes during excavation and then disposed of 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. TCE concentrations in groundwater have decreased since the IM was conducted.

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.

MLC continues to complete interim Site-wide groundwater monitoring in accordance with the revised Site-wide Groundwater Monitoring Plan submitted to IDEM in October 2010.

CORRECTIVE MEASURES

A draft Corrective Measures Proposal was submitted to IDEM in March 2008. A revised corrective measures proposal will be prepared as necessary to address the results of activities completed since the time of the initial proposal.

UPCOMING ACTIVITIES

Groundwater monitoring and reporting is ongoing. A vapor intrusion study will be conducted in the Winter of 2011.

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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