



**CONESTOGA-ROVERS
& ASSOCIATES**

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December 9, 2010

Reference No. 017324

Mr. Don Stilz
Senior Environmental Manager
Indiana Department of Environmental Management
Office of Land Quality/Permits Branch
100 North Senate Avenue Room IGCN 1101
Indianapolis, IN 46204

Dear Mr. Stilz:

Re: Revised Scope of Work
Off-Site Groundwater Investigation
Former GM Manual Transmissions of Muncie
Muncie, Indiana

Conestoga-Rovers & Associates (CRA) has prepared this letter to summarize revisions to the proposed scope of work to conduct an off-Site groundwater investigation at the former General Motors (GM) Manual Transmissions of Muncie (MTM) facility in Muncie, Indiana (Site). The proposed scope of work for the off-Site groundwater investigation was summarized in a memorandum to the Indiana Department of Environmental Management (IDEM) dated October 22, 2010. Based on the November 24, 2010 conference call between representatives of IDEM (Mr. Don Stilz) and Motors Liquidation Company (MLC) (Mr. David Favero), CRA has prepared this letter to document revisions and/or clarifications to the proposed scope of work.

Door-to-Door Survey

Instead of the proposed street level survey, CRA will conduct a door-to-door survey of the Properties of Interest downgradient of the Site. The purpose of the door-to-door survey will be to provide residents with a fact sheet (Attachment A) about historical and upcoming activities at the Site, inquire about the presence or absence of groundwater wells on the property and, if present, the construction details of the well. In addition, the survey will confirm the construction style of buildings on the property (i.e., if basements or crawl spaces are present). The boundary of the door-to-door survey is presented on Figure 1.

Confirm the Proposed Monitoring Well Construction Details

Five boreholes will be advanced using direct push drilling techniques for the purpose of installing monitoring wells. Monitoring wells will be constructed with 2-inch diameter



polyvinyl chloride (PVC) riser pipe with a No. 10-slot PVC screen. The depth of the well and length of the well screen will be determined based on the stratigraphic and hydrogeologic conditions encountered. A maximum screen length of 10-feet will be used such that the monitoring wells are screened to straddle the water table. A sand pack of No. 2 silica sand shall be placed up to two feet above the top of the screened interval, and bentonite chips will be used to achieve a seal above the sand to within 3 feet of ground surface. The well will be completed with an expandable locking cap to prevent tampering with the well. Three feet of concrete shall be placed below the ground surface to achieve a surface seal, and a flushmount protective casing will be installed for protection of and access to the monitoring well.

Proposed Monitoring Well Locations

IDEM requested that the proposed off-Site monitoring wells be placed so to minimize potential influences from nearby industry. The properties identified by IDEM include a salvage yard, a nearby property undergoing Resource Conservation and Recovery Act (RCRA) corrective action, and a nearby property of unknown ownership and operations.

A salvage yard is located downgradient of the Site, and directly north of the railroad that runs along the Site's northern property boundary. The current operations at this property have the potential to impact soil and groundwater, the nature and extent of which are currently unknown.

PSP Realty Inc. (PSP Realty) located at 1011 South Perkins Avenue is undergoing a RCRA corrective action due to waste materials left at the property by a former tenant, resulting in an Agreed Order (AO) with IDEM. A review of files in IDEM's Virtual File Cabinet (VFC) database revealed that two groundwater grab samples were most recently collected from the PSP Realty property on January 13, 2010, as documented in the "*Closure Sampling Report*" prepared by Astbury Environmental Engineering on behalf of PSP Realty. The results of the groundwater sampling indicated trichloroethene (TCE) above the Risk Integrated System of Closure (RISC) Residential Default Closure Level (RDCL), but below the RISC Industrial Default Closure Level (IDCL). The source of the TCE detected on PSP Realty's property is currently unknown.

The wedge-shaped property south of West 2nd Street (i.e., 1415 West 2nd Street) is owned by Mr. Wayne Handshoe. Mr. Handshoe also owns a number of other properties on West 2nd Street, including a used auto parts business. The use of the wedge-shaped property will be confirmed concurrent to the door-to-door survey.



Though CRA recognizes the potential influence from each of these properties to the groundwater quality at the proposed downgradient monitoring well installation areas, no changes to the proposed areas are suggested. If monitoring wells were to be placed south of the salvage yard and wedge-shaped property to eliminate potential influences from the operations at these nearby properties, the proposed monitoring wells would need to be installed in close proximity to the railroad and the Site's northern property boundary. If the monitoring wells are to be installed on the railroad property, MLC would need to enter into negotiations with the railroad, which are typically lengthy and would delay implementation of the proposed scope. Installation of monitoring wells within the railroad property would yield little new information due to its close proximity to the Site's downgradient property boundary, which is well investigated. Additionally, installation of monitoring wells further south than what is proposed (i.e., more than 100-feet from an occupied building) would not yield information that will be helpful in assessing whether an unacceptable risk to downgradient receptors exists from groundwater volatilization to indoor air in accordance with IDEM's Draft Vapor Intrusion Pilot Program Guidance (IDEM, April 2006) and associated February 2010 supplement.

The proposed placement of monitoring wells is shown on Figure 1.

Community Relations Plan

A Community Relations Plan (CRP) will be developed and included in the Site-wide Investigation Work Plan. The goal of the CRP will be to keep the public informed as the project progresses, and to provide a mechanism for disseminating information on a routine as well as a non-routine basis in response to individual requests.

Proposed Schedule

The door-to-door survey will be conducted during the week of December 13, 2010. Monitoring well installation will be conducted during the week of January 3, 2010 pending subcontractor approval of a City of Muncie Right-of-Way Use Application. Monitoring well development and sampling will be completed one week after wells are installed. Assuming a standard three week turn around time for sample analysis at the laboratory, CRA will submit a letter report outlining the well construction details and sampling results eight weeks after sample collection.



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Deliverables

All future deliverables shall be provided to IDEM in the form of one paper copy, and one scanned electronic copy.

Should you have any questions on the above, please do not hesitate to contact our office.

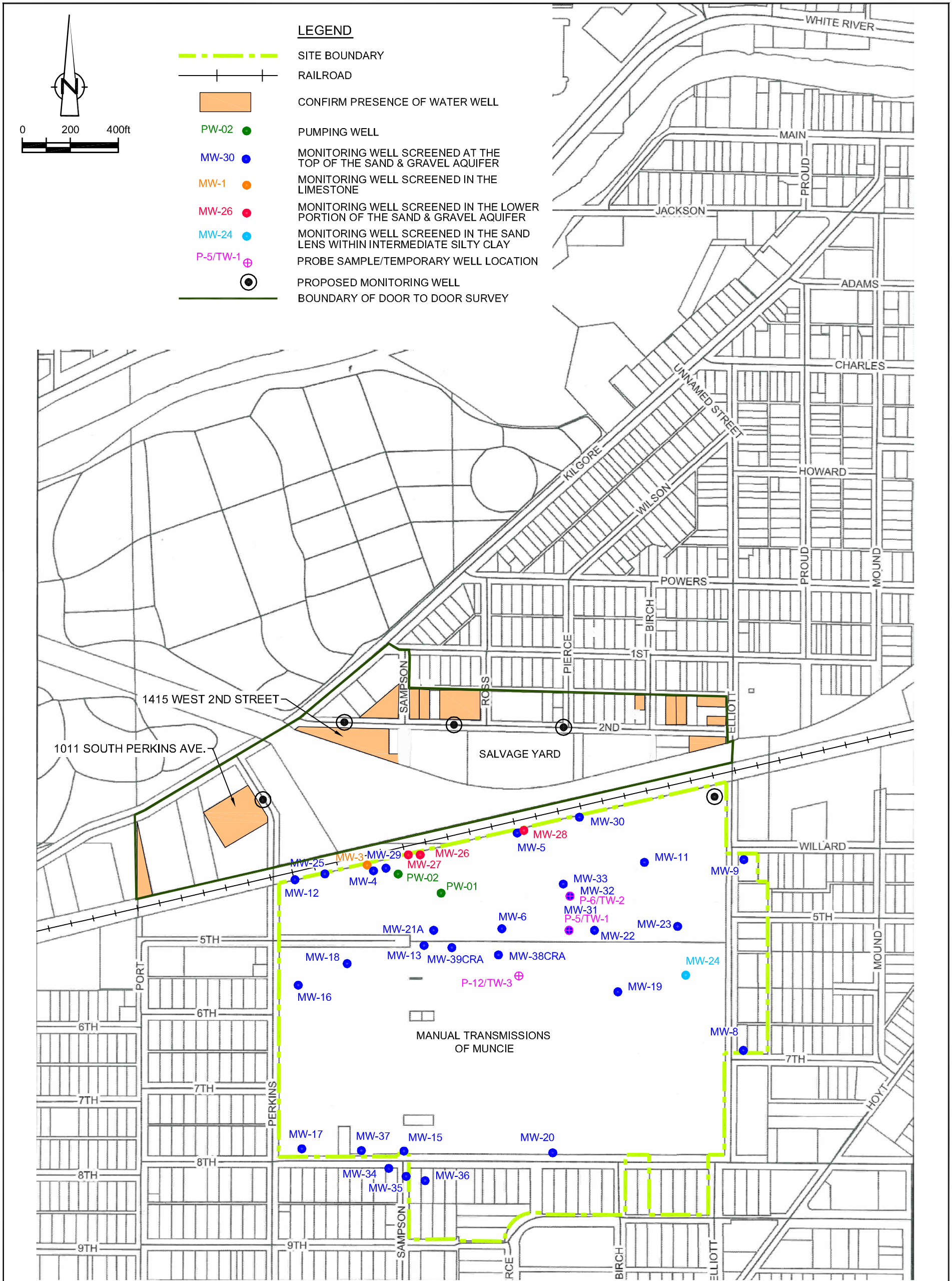
Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Shannon Richardson, B. A. Sc.

JB/jb/1
Encl.

c.c.: David Favero



SOURCE: DELAWARE COUNTY'S GIS INTERMAP.

figure 1

REVISED SCOPE OF WORK
OFF-SITE GROUNDWATER INVESTIGATION
FORMER MANUAL TRANSMISSIONS OF MUNCIE
MOTORS LIQUIDATION COMPANY
Muncie, Indiana



ATTACHMENT A

FACT SHEET

DRAFT**RCRA CORRECTIVE ACTION
MOTORS LIQUIDATION COMPANY****1200 West 8th Street
MUNCIE, 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 1200 West 8th Street, Muncie, Indiana (Site), most recently operated as Manual Transmissions of Muncie (MTM). These activities are being conducted under the oversight of the Indiana Department of Environmental Management (IDEM).

The Corrective Action process includes a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of the soil and groundwater conditions at and in the vicinity of the Site. Based upon an evaluation of the results obtained during these investigations, appropriate corrective measures will be proposed and implemented to ensure that the soil and groundwater at the Site do not pose an unacceptable risk to human health and the environment.

SITE BACKGROUND

The Site is located in Delaware County, Indiana, and consists of a 62 acre property on West 8th Street, as well as surrounding properties east of Elliot Street and south of West 8th Street that were used as employee parking lots for the former plant. Manufacturing operations began at the Site in 1904 when the northern 18 acres of the site were developed with the construction of the former Delco Remy Battery Plant. After several plant expansions and updates, the property was developed to include a manufacturing building approximately 1.2 million square feet in size, and several outlying buildings and structures. In 1990, the site was operated as New Venture Gear, Inc. through a joint venture between GM and Acustar New Process Gear, Inc. Ownership and operational responsibility of the site reverted to GM in 2003 and operations began as Manual Transmissions of Muncie in 2004. Demolition of the plant commenced in 2007 and activities were completed in 2009.

**The following remedial activities have been completed at the Site:**

- » Removal of 15 underground storage tanks (USTs) (1989, 1990)
- » Excavation and disposal of surface (0-2 ft bgs) soils, and installation of a bioremediation system at an above ground storage tank (AST) location (1993)
- » Various subsurface investigations associated with former USTs (1995)
- » In-place closure of one UST (1996)
- » Decommissioning of the in-situ bioremediation system (1996)
- » Subsurface investigations associated with two former USTs (2004, 2005)
- » Various soil and groundwater investigations (2007)
- » Implementation of groundwater and land use limitations through an Environmental Restrictive Covenant (ERC), entered into by GM (2008)

DRAFT

As result of GM's bankruptcy, certain operating assets of GM were sold to a newly formed company, which is now known as General Motors Company or General Motors LLC. Existing, non-continuing assets, including this Site, 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.

RCRA CORRECTIVE ACTION

The United States Environmental Protection Agency (U.S. EPA) requested that the Indiana Department of Environmental Management (IDEM) conduct a RCRA Facility Assessment (RFA) of the Site in 1989. The RFA consisted of a Preliminary Review (PR), a Visual Site Inspection (VSI), and a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Preliminary Assessment (PA). According to the RFA report, the CERCLA PA and VSI provided no evidence of a current (at that time) release of hazardous materials to the environment from the Site. In the CERCLA PA, IDEM recommended the Site receive a priority assessment status of No Further Remedial Action Planned (NFRAP). At the time of the RFA, GM had recently conducted an investigation at the former Delco Remy Battery Plant. The CERCLA PA noted that only preliminary reports of the GM investigation were available and therefore, the NFRAP status of the site was conditional on the final report by GM not identifying any areas of concern at the former Battery Plant. The U.S. EPA Region V Comprehensive Corrective Action Report (CCAR) database indicates that the RFA concluded that a RCRA Facility Investigation (RFI) should be conducted. According to the CCAR database, the Site was assigned

a low corrective action priority on September 27, 1991, was re-evaluated on March 31, 1994, and remained a low corrective action priority.

RCRA FACILITY INVESTIGATION/SITE CLOSURE

MLC is currently in communication with IDEM to develop a strategy for Site closure.

UPCOMING ACTIVITIES

Monitoring wells will be installed within the road allowance along 2nd Street and South Perkans Avenue in early January 2011. Drilling activities will be conducted during the day and in such a manner as to limit disturbances due to traffic and noise. Groundwater samples will be collected from the newly installed wells in mid-January 2011.

ENVIRONMENTAL RESPONSE TRUST

In October 2010 the U.S. Government announced that MLC has agreed to resolve its liabilities at 89 sites relating to liabilities under the Comprehensive Environmental Response, Compensation and Liability Act, the Resource Conservation and Recovery Act, and the Clean Air Act. The bankruptcy settlement, if and when approved by the bankruptcy court, will set up an Environmental Response Trust to conduct, manage, and fund cleanup at 89 MLC owned sites where MLC has liabilities, including the former Manual Transmissions of Muncie facility.

CONTACT INFORMATION

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