



PHASE I ENVIRONMENTAL SITE ASSESSMENT

Vacant Lot
Key Code 18 9999-1B-01
Anderson, Indiana

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TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION	1
1.1 DEFINITIONS AND ACRONYMS.....	1
1.1.1 DEFINITIONS.....	1
1.1.2 ACRONYMS	2
1.2 PURPOSE AND SCOPE OF PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)	3
1.3 SITE DESCRIPTION	4
1.4 ENVIRONMENTAL SETTING	5
1.4.1 TOPOGRAPHY.....	5
1.4.2 GEOLOGY	5
1.4.3 HYDROGEOLOGY	6
1.4.4 SURFACE WATER BODIES	6
1.4.5 ENVIRONMENTALLY SENSITIVE AREAS	7
1.4.6 ZONING OF SITE AND AREA.....	7
1.5 SITE HISTORY	7
1.5.1 PAST OWNER HISTORICAL USE	7
1.5.2 CURRENT OWNER HISTORICAL USE.....	8
1.5.3 CURRENT USE.....	8
1.5.4 CURRENT AND HISTORICAL USE OF ADJACENT SURROUNDING PROPERTIES.....	8
1.6 REPORT ORGANIZATION.....	9
2.0 ENVIRONMENTAL DATABASES SEARCH AND HISTORICAL RECORDS SEARCH	10
2.1 ENVIRONMENTAL DATABASES SEARCH	10
2.1.1 FEDERAL DATABASES.....	10
2.1.2 STATE DATABASES	16
2.2 PUBLIC RECORD REVIEW RESULTS	18
2.2.1 U.S. EPA.....	18
2.2.2 STATE AGENCY	18
2.2.3 LOCAL MUNICIPALITY	18
2.3 HISTORICAL RECORDS REVIEW.....	19
2.3.1 SANBORN FIRE INSURANCE MAPS.....	19
2.3.2 PROPERTY TITLE SEARCH	19
2.3.3 AERIAL PHOTOGRAPHS.....	19
2.3.4 HISTORICAL TOPOGRAPHIC MAPS	21
2.3.5 CITY DIRECTORY SEARCH	22
2.4 SITE FILES	24
2.4.1 FILES	24
2.4.2 VARIOUS CORRESPONDENCE / OTHER DOCUMENTATION	24
2.4.3 DRAWINGS	24
2.4.4 PERMITS.....	25

TABLE OF CONTENTS (Continued)

	<u>Page</u>
3.0 SITE RECONNAISSANCE	26
3.1 SPECIAL PROCESSES AND EQUIPMENT	26
3.2 UTILITY SERVICES	26
3.3 UNDERGROUND STORAGE TANKS (USTS).....	27
3.4 ABOVE GROUND STORAGE TANKS (ASTS)	27
3.5 RAW MATERIAL USAGE AND STORAGE.....	28
3.6 SOLID WASTE HANDLING / STORAGE AND DISPOSAL	29
3.7 HAZARDOUS WASTE HANDLING / STORAGE AND DISPOSAL	29
3.8 POLYCHLORINATED BIPHENYLS (PCBS)	30
3.9 ASBESTOS CONTAINING MATERIAL (ACM)	30
3.10 INDUSTRIAL WASTEWATER / SANITARY SEWERS	31
3.11 STORMWATER	31
3.12 AIR EMISSIONS	32
3.13 IONIZING RADIATION	32
3.14 PERMITS.....	32
3.15 SPILL REPORTS / RELEASES	33
3.16 EMPLOYEE RIGHT TO KNOW (ERTK) / HEALTH AND SAFETY	33
3.17 SARA TITLE III – EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT (EPCRA).....	33
3.18 WELLS	33
3.19 LEAD BASED PAINT (LBP)	34
4.0 SUMMARY OF ENVIRONMENTAL CONDITIONS	35
4.1 PAOCS	35
4.2 PAORS	35
4.3 ADDITIONAL POTENTIAL ENVIRONMENTAL ISSUES.....	35
5.0 CONCLUSIONS.....	36
6.0 CERTIFICATION	37
7.0 REFERENCES	38

LIST OF FIGURES

FIGURE 1.1	SITE LOCATION
FIGURE 1.2	SITE PLAN
FIGURE 3.1	LOCATIONS OF PAORs

LIST OF APPENDICES

APPENDIX A	ASSESSOR'S QUALIFICATIONS
APPENDIX B	NATIONAL WETLANDS INVENTORY MAP
APPENDIX C	LOCAL ZONING PLANS
APPENDIX D	DATABASE SEARCH RESULTS
APPENDIX E	SANBORN MAPS
APPENDIX F	AERIAL PHOTOGRAPHS
APPENDIX G	HISTORICAL TOPOGRAPHIC MAPS
APPENDIX H	CITY DIRECTORY
APPENDIX I	SITE PHOTOGRAPHS

EXECUTIVE SUMMARY

Conestoga-Rovers & Associates (CRA) was retained by General Motors Corporation (GM), at the direction of legal counsel, to complete a Phase I Environmental Site Assessment (ESA) of the vacant lot (Key Code 9999-1B-01) located near the intersection of Hamilton Place and 32nd Street in Anderson, Indiana (Site). The purpose of the Phase I ESA was to identify, through use of good commercial and customary practice, recognized environmental conditions (RECs) and determine if the recognized environmental conditions are potential areas of concern (PAOCs) or potential areas of release (PAORs), as defined by GM, associated with prior or current activities conducted at the Site. This ESA was conducted to assist GM to evaluate business environmental risk as defined in ASTM E-1527-00 for the Site. This ESA included an evaluation of substantive potential compliance issues.

The Site is located in the City of Anderson in Madison County, Indiana. The Site consists of an approximately 0.87-acre parcel of land comprised of unvegetated land. Based on available information and observations during the Site inspection, the Site is currently vacant and unutilized. Historically, a fire pump house and water tank were present on the Site and served the adjacent former Delphi Energy and Engine Management Systems (Delphi) plants, located to the east-northeast of the Site. The use of the pump house and water tank was discontinued and in January 2007, the pump house and the water tank were decommissioned and demolished. Additionally, a 30-inch water supply well was formerly located on the property, which was reportedly used as a source of mill water for the former adjacent Delphi plants. The water supply well was abandoned in January 2007. Prior to development of the fire pump house and water tank in the 1970s, the Site was reportedly residential and vacant land.

Based on the Phase I ESA, including the Site inspection, information provided by individuals associated with the Site, documents reviewed, and the environmental database searches, no PAOCs were identified at the Site.

Based on the Phase I ESA, including the Site inspection, information provided by individuals associated with the Site, documents reviewed, and the environmental database searches, the following PAOR was identified at the Site:

1. **Former Residential Properties:** Based on the review of aerial photographs, and discussions with individuals associated with the Site, the Site was utilized as a residential property prior to the construction of the water tank and associated pump house. No information regarding historical use of heating oil USTs or ASTs, or property demolition procedures was available to CRA.

Based on the Phase I Environmental Site Assessment, including the Site inspection, information provided by individuals associated with the Site, documents reviewed, and the environmental database searches, in addition to the PAOCs and PAORs identified above, the following potential environmental issue was identified at the Site:

1. **Radon:** The U.S. EPA has determined Madison County to be in a Level 1 radon zone with indoor air concentrations of radon anticipated to be greater than 4 pCi/L. The U.S. EPA established action level for radon gas is 4 pCi/L. No basements or below-grade structures are currently present at the Site; however, the potential presence of radon concentrations greater than the U.S. EPA threshold could impact future development at the Site.

1.0 INTRODUCTION

1.1 DEFINITIONS AND ACRONYMS

1.1.1 DEFINITIONS

Recognized Environmental Condition (REC) - the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into the soils, groundwater, or surface water of the property. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

Potential Area of Concern (PAOC) - areas with a documented release or likely presence of hazardous substances or petroleum products into the soils, groundwater, or surface water of the property that could pose an unacceptable risk to human health or the environment. The term PAOC is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

Potential Area of Release (PAOR) – areas, equipment, or structures that contain hazardous substances or petroleum products under conditions that, if not managed properly, represent a material threat of a release into the soils, groundwater, or surface water of the property. A PAOR is not a PAOC because there is no evidence of a release to the environment, while if there is evidence of a release then the PAOR would be classified as a PAOC that would require decommissioning. During decommissioning activities, all materials shall be removed from the PAOR, properly decontaminated, and all waste generated shall be managed and disposed in a manner that eliminates the material threat of release.

Phase I ESA - Non-intrusive investigation that identifies PAOCs, which may require further investigation in subsequent phases of work.

Phase II Environmental Site Inspection (ESI) - Intrusive investigation to qualitatively and quantitatively identify contaminants in soil, groundwater, and/or surface water for PAOCs identified in the Phase I ESA.

1.1.2 ACRONYMS

The following acronyms are used in this report in addition to those found in ASTM Standard E1527-00:

ACM	Asbestos Containing Materials
AMSL	Above Mean Sea Level
AST	Aboveground storage tank
bgs	Below Ground Surface
BTEX	Benzene, toluene, ethylbenzene, xylenes
CA	Corrective Action
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act of 1980 (as amended)
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CORRACTS	RCRA - Corrective Action
CRA	Conestoga-Rovers & Associates
EDR	Environmental Data Resources
EPCRA	Emergency Planning and Community Right-to-Know Act
ERD	Environmental Response Division
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
ESI	Environmental Site Investigation
FINDS	Facility Index System
FTTS	FIFRA / TSCA Tracking System
FRDS	Federal Reporting Data System
GM	General Motors Corporation
HMIRS	Hazardous Materials Information Reporting System
IDEM	Indiana Department of Environmental Management
LUST	Leaking Underground Storage Tank
LQG	Large Quantity Generator of Hazardous Waste
MINES	Mines Master Index File
NCP	National Contingency Plan
NFRAP	No Further Remedial Action Planned
NPL	National Priority List
NWIM	National Wetland Inventory Map
PADS	PCB Activity System
PAOC	Potential Area of Concern
PAOR	Potential Area of Release

PCBs	Polychlorinated biphenyls
PNAs	Polynuclear Aromatic Hydrocarbons
PR/VSI	Preliminary Review / Visual Site Inspection
RAATS	Resource Conservation and Recovery Administrative Action Tracking System
RCRA	Resource Conservation and Recovery Act (as amended)
RCRIS	Resource Conservation and Recovery Act Information System
REC	Recognized Environmental Condition
RFI	RCRA Facility Investigation
Site	Subject property on which Phase I ESA is conducted
SQG	Small Quantity Generator of Hazardous Waste
SVOC	Semi-Volatile Organic Compounds
TRIS	Toxic Release Inventory System
TSCA	Toxic Substances Control Act
TSD	Treatment, Storage, or Disposal (RCRA)
U.S. EPA	United States Environmental Protection Agency
UST	Underground Storage Tank
VOC	Volatile Organic Compounds
WWTP	Waste Water Treatment Plant

1.2 PURPOSE AND SCOPE OF PHASE I ENVIRONMENTAL SITE ASSESSMENT (ESA)

Conestoga-Rovers & Associates (CRA) was retained by General Motors Corporation (GM), at the direction of legal counsel, to complete a Phase I Environmental Site Assessment (ESA) of the vacant lot (Key Code 9999-1B-01) located near the intersection of Hamilton Place and 32nd Street in Anderson, Indiana (Site). In defining a standard of good commercial and customary practice for conducting an environmental site assessment of a parcel of property, the goal of the processes established by the ASTM Standard Practice E1527-00 is to identify recognized environmental conditions (RECs). The purpose of the Phase I ESA was to use good commercial and customary practices to identify RECs and determine if these RECs are potential areas of concern (PAOCs) or potential areas of release (PAORs) associated with prior or current activities conducted at the Site. This ESA was conducted to assist GM to evaluate business environmental risk as defined in ASTM E1527-00 for the Site. This ESA included an evaluation of substantive potential compliance issues. The Site location is presented on Figure 1.1. The current Site plan is presented on Figure 1.2.

The Phase I ESA was conducted in general accordance with ASTM Standard E1527-00, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Practices" for conducting environmental assessments. The assessment included an environmental database search, historical records review, a Site inspection, discussions with individuals associated with the Site, and a review of available Site records. This Phase I ESA was prepared by Ms. Jennifer Quigley, and reviewed by Mr. Brian Boevers, both of CRA. Copies of curriculum vitae outlining their qualifications are presented in Appendix A. The following tasks were conducted during the assessment:

- review of Federal and State environmental databases and historical records;
- review of aerial photographs of the Site;
- review of past and current property use and adjacent property occupancy;
- inspection of the facilities, equipment, utility services, operations, and associated Site records;
- observations of Site conditions;
- review of chemical use and storage and spill/release incidents;
- review of waste handling, accumulation, storage, and disposal practices;
- review of air emissions, and stormwater and wastewater discharges;
- review of equipment that may potentially contain polychlorinated biphenyls (PCBs);
- interviews with individuals associated with the Site;
- observation of potential asbestos-containing materials (ACM);
- review of aboveground and underground storage tank records;
- review of the results of prior inspections and remedial activities conducted at the Site; and
- review of previously prepared environmental reports for the Site.

This report summarizes the information gathered by CRA during the Phase I ESA and identified PAOCs and PAORs associated with the Site. This Phase I ESA is the sole property of GM and has been prepared for use by GM and may not be relied on by any other party, without the written consent of CRA.

1.3 SITE DESCRIPTION

The Site is bounded by a substation and Amacor facility (formerly Xstrata Magnesium Corporation (Xstrata)) to the east, Conrail Railroad and beyond by residential properties

to the north, vacant land and beyond by commercial and residential areas to the west, and 32nd Street and residential properties to the south. The Site location is presented on Figure 1.1.

The Site consists of an approximately 0.87-acre parcel of land comprised of unvegetated land. Based on available information and observations during the Site inspection, the Site is currently vacant and unutilized. A Site Plan is presented on Figure 1.2.

1.4 ENVIRONMENTAL SETTING

Based on observations made during the Site inspection, the Site is located in an area of mixed industrial, commercial, and residential land use.

No surface water bodies or wetlands are located on or adjacent to the Site; however, Pittsford Ditch is located approximately a quarter-mile to the east of the Site.

1.4.1 TOPOGRAPHY

The Site is located at an elevation of approximately 900 feet above mean sea level (AMSL). The slope of the land surface at the Site is to the east-northeast. The greatest relief in the vicinity of the Site is approximately a mile to the north of the Site, where the elevation is approximately 840 feet AMSL, which is the White River flood plain. Figure 1.1 presents the Site location and topography of the immediate area surrounding the Site.

1.4.2 GEOLOGY

Based on information about regional geology, the Site is characterized by the glaciofluvial loamy till of the Huron-Erie Lobe common to central Indiana, which are Wisconsin deposits. The configuration of the land surface or physiography is dictated by the presence of these glacial sediments. Based on a review of *The Soil Survey of Madison County, Indiana* (United States Department of Agriculture, Soil Conservation Service, March 1967), Site soils consist of Fox series silty loam with a till substratum. Fox series soils are well-drained soils formed from glacial outwash material that are underlain by calcareous till. Fox series soils reportedly consist of a granular silt loam surficial layer underlain by interbedded layers of sand/gravel and loam. Bedrock

would be expected to be from 100 to 200 feet below ground surface and consist of Silurian age limestone and dolomite.

No information regarding the geologic conditions at the Site was available for review by CRA; however, based on stratigraphic information gathered during subsurface investigations within a half-mile of the Site, the overburden at the Site is expected to consist of a sand and/or clay surficial layer containing varying amounts of gravel, sand, silt, and clay underlain by a sand and gravel layer. Based on the review of available information for surrounding properties, this sand and gravel layer extends to approximately 40 feet below ground surface (bgs), where a regional competent clay layer is encountered.

1.4.3 HYDROGEOLOGY

Based on regional information about groundwater, the Site hydrogeology may consist of groundwater present as perched water within 20 feet of ground surface. Groundwater is present in the vicinity of the Site within the glacial till overburden unit at approximately 15 to 20 feet bgs. Groundwater may also be present within bedrock beneath the Site. Groundwater levels in the overburden material would be expected to vary in response to rainfall and changes in the levels in nearby surface waters.

No groundwater monitoring well logs or water level measurements were available for review by CRA to determine Site specific hydrogeology; however, based on the review of information gathered during subsurface investigations within a half-mile of the Site, groundwater is expected to be present at the Site at a depth of approximately 15 to 20 feet bgs and groundwater flow in the overburden material is reported to be to the north-northwest.

1.4.4 SURFACE WATER BODIES

The nearest surface water bodies to the Site are Pittsford Ditch, located approximately a quarter-mile to the east of the Site, which flows to the north and discharges to the White River located approximately one mile to the north of the Site.

No surface water was observed on Site during the Site inspection.

1.4.5 ENVIRONMENTALLY SENSITIVE AREAS

No environmentally sensitive areas (i.e., wetlands, parklands, etc.) exist on the Site. CRA obtained and reviewed the National Wetlands Inventory Map (NWIM) for Anderson, Indiana. No wetlands were mapped for the Site. A copy of the NWIM is presented in Appendix B.

1.4.6 ZONING OF SITE AND AREA

Based on the review of the City of Anderson zoning map, the Site is zoned for industrial use. The surrounding areas are zoned for a mixture of residential, business, and industrial use. A copy of a portion of the City of Anderson zoning map is presented in Appendix C.

1.5 SITE HISTORY

Historically, a fire pump house and water tank were present on the Site and served the adjacent former Delphi Energy and Engine Management Systems (Delphi) plants, located to the east-northeast of the Site. The use of the pump house and water tank was discontinued and in January 2007, the pump house and the water tank were decommissioned and demolished. Additionally, a 30-inch water supply well was formerly located on the property, which was reportedly used as a source of mill water for the former adjacent Delphi plants. The water supply well was abandoned in January 2007. Prior to development as a fire pump house and water tank in the 1970s, the Site was reportedly residential and vacant land.

1.5.1 PAST OWNER HISTORICAL USE

Based on the review of available aerial photographs, the Site was residential and vacant land prior to development as a fire pump house and water tank.

1.5.2 CURRENT OWNER HISTORICAL USE

The fire pump house and water tank formerly located on the Site were originally developed by GM in the 1970s and were decommissioned and demolished in January 2007.

1.5.3 CURRENT USE

The property is currently vacant and unused.

1.5.4 CURRENT AND HISTORICAL USE OF ADJACENT SURROUNDING PROPERTIES

Current use of adjacent surrounding properties is consistent with the zoning discussed in Section 1.4.6. Historical use of the adjacent properties was unknown prior to development as residential, commercial, and industrial properties; however, it is assumed that these properties were vacant or agricultural land.

A substation and an Amacor facility (formerly Xstrata Magnesium Corporation (Xstrata)) is present to the east of the Site. Individuals associated with the Site indicated that the substation is owned by Anderson Power and Light. No staining was noted at the substation at the time of the Site inspection; however, scattered snow cover prevented a full inspection. Based on the review of the environmental database search results (see Section 2.0), Xstrata is listed in the RCRIS-SQG Report and on the FINDS List. Amacor was listed in the UST Report as having one permanently out of service gasoline UST and in the LUST Report as having a No Further Action status under the 1994 guidance (low priority with soil impact only). Additionally, Amacor was listed on the CERCLIS List as being a Removal Only Site (No Site Assessment Work Needed), with removal started on January 14, 2005 and completed on January 16, 2005. The priority level listed in the database search results is "Cleaned Up." Advanced Magnesium Alloys Corporation is listed in the Tier 2 Database and the AIRS. Prior to operation of this adjacent property by Amacor and Xstrata, it was operated by Delphi Plant 19. Plant 19 was included in the RCRA CA investigation activities. Based on the review of available documentation, Plant 19 was removed from the required RCRA CA activities, no investigation was required, and was sold in 1999.

The Conrail Railroad is located adjacent to the north of the Site with residential properties located beyond. Vacant land is present to the west of the Site with commercial and residential areas located beyond. 32nd Street is present to the south of the Site with residential properties located beyond. Based on the review of aerial photographs, these properties appear to have been residential and commercial in nature prior to the 1960s.

No PAOCs or PAORs were identified associated with adjacent property historical use.

1.6 REPORT ORGANIZATION

The remainder of this Phase I ESA is organized as follows:

PHASE I ESA

- **Section 2.0 – Environmental Database Search and Historical Records Review** - presents the results of the environmental database searches, public records reviewed, Sanborn map review, aerial photograph review, and Site files reviewed.
- **Section 3.0 – Site Reconnaissance** - presents the results of the Site inspection by issues (i.e. aboveground storage tanks, underground storage tanks, raw material usage, etc.).
- **Section 4.0 – Summary of Recognized Environmental Conditions** - presents a summary of the PAOCs and PAORs identified at the Site.
- **Section 5.0 – Conclusions** - presents the conclusions reached in the Phase I ESA based on the PAOCs and PAORs identified in Section 4.0.
- **Section 6.0 – Certification** - presents certification that this Phase I ESA has been completed according to good commercial and customary practices and in general accordance with ASTM Standard E1527-00.
- **Section 7.0 – References** - presents the sources of information used in the development of this Phase I ESA.

2.0 ENVIRONMENTAL DATABASES SEARCH AND HISTORICAL RECORDS SEARCH

2.1 ENVIRONMENTAL DATABASES SEARCH

CRA contracted Environmental Data Resources, Inc. (EDR) to conduct a search of federal and state environmental databases. Based on the address of the Site, the database searches were completed to assist in the identification of conditions at the Site and within a one-mile radius distance. A copy of the database search is included as Appendix D. The following databases were searched with the findings as follows:

2.1.1 FEDERAL DATABASES

1. National Priority List (NPL) - The NPL is a U.S. EPA listing of the nation's worst uncontrolled or abandoned hazardous waste sites. NPL Sites are targeted for possible long-term remedial action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980. In addition, the NPL Report includes information concerning cleanup agreements between the U.S. EPA and potentially responsible parties, any liens filed against contaminated properties, as well as the past and current U.S. EPA budget expenditures tracked within the Superfund Consolidated Accomplishments Plan (SCAP).

FINDING: According to the databases searched, the Site was not on the NPL. No sites within a one-mile radius of the Site were on the NPL.

2. Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) – The CERCLIS List contains data on potentially hazardous waste sites that may have been reported to the U.S. EPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the NPL and sites which are in the screening and assessment phase for possible inclusion on the NPL.

FINDING: According to the databases searched, the Site was not on the CERCLIS List. No sites within a half-mile radius of the Site were on the CERCLIS List.

One site was listed on the CERCLIS List, but could not be located by EDR with respect to the Site due to incomplete address information, this being Amacor Residential located at 3Snd and Forrest Terrace (sic 32nd and Forrest Terrace). 32nd and Forrest Terrace is located one block west of the intersection of 32nd Street and Hamilton Place (i.e., the approximate location of the Site). No further information was available in the environmental database search results.

3. No Further Remedial Action Planned Sites Report (NFRAP) – As of February 1995, CERCLIS sites designated “No Further Remedial Action Planned” have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund Action or NPL consideration. EPA has removed approximately 25,000 CERCLIS sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA’s Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

FINDING: According to the databases searched, the Site was not listed in the NFRAP Sites Report. No sites within a half-mile radius of the Site were listed in the NFRAP Sites Report.

One site was listed in the NFRAP Sites Report, but could not be located by EDR with respect to the Site due to incomplete address information, this being Indiana Salvage located at Grand Avenue, 500 feet east of Jack.

4. Resource Conservation and Recovery Information System (RCRIS) – Non-Corrective Action Treatment, Storage and Disposal (TSD) Facilities Report - The RCRIS-TSD Report contains information regarding these facilities that either treat, store or dispose of U.S. EPA-regulated hazardous waste. The following information also is included in the RCRIS-TS Report: information regarding the status of facilities tracked by the Resource Conservation and Recovery Act (RCRA) Administrative Action Tracking System (RAATS); inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; and a complete listing of U.S. EPA-regulated hazardous wastes which are generated or stored on site.

FINDING: According to the databases searched, the Site was not listed in the RCRIS-TSD Report. No sites within a one-mile radius of the Site were listed in the RCRIS-TSD Report

5. Resource Conservation and Recovery Act (RCRA) - Corrective Action (CORRACTS) Report - The CORRACTS Report contains information pertaining to hazardous waste treatment, storage and disposal facilities (RCRA TSDs) which have conducted or are currently conducting corrective actions as regulated by the Resource Conservation and Recovery Act. The following information also is included in the CORRACTS Report: information regarding the status of facilities tracked by the RAATS; inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; information pertaining to corrective actions undertaken by the facility or the U.S. EPA; and a complete listing of U.S. EPA-regulated hazardous wastes which are generated or stored on site.

FINDING: According to the databases searched, the Site was not listed in the CORRACTS Report. No adjacent sites were listed in the CORRACTS Report. One site within a one-mile radius of the Site was listed in the CORRACTS Report, this being Delphi Energy and Engine Management Systems "Acre Area" (address not provided).

6. Resource Conservation and Recovery Act - Large Quantity Generators (RCRA-LQG) Report - The RCRA-LQG Report contains information regarding facilities that either generate more than 1,000 kilograms (kg) of U.S. EPA-regulated hazardous waste per month or meet other applicable requirements of RCRA. The following information also is included in the RCRA-LQG Report: information regarding the status of facilities tracked by the RAATS; inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; information pertaining to corrective actions undertaken by the facility or the U.S. EPA; and a complete listing of U.S. EPA-regulated hazardous wastes which are generated or stored on site.

FINDING: According to the databases searched, the Site was not listed in the RCRA-LQG Report. No sites within a quarter-mile radius of the Site were listed in the RCRA-LQG Report.

7. Resource Conservation and Recovery Act - Small Quantity Generators (RCRA-SQG) Report - The RCRA-SQG Report contains information regarding facilities

that either generate between 100 kg and 1,000 kg of U.S. EPA-regulated hazardous waste per month or meet other applicable requirements of RCRA. The following information also is included in the RCRA-SQG Report: information regarding the status of facilities tracked by the RAATS; inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; information pertaining to corrective actions undertaken by the facility or the U.S. EPA; and a complete listing of U.S. EPA-regulated hazardous wastes which are generated or stored on site.

FINDING: According to the databases searched, the Site was not listed in the RCRA-SQG Report. No adjacent sites were listed in the RCRA-SQG Report. One site within a quarter-mile radius was listed in the RCRA-SQG, this being Delco Remy, Inc. Plant 10 located at 2828 Monroe Street.

The following sites were listed in the RCRA-SQG Report, but could not be located with respect to the Site by EDR due to incomplete address information:

<u>Facility</u>	<u>Address</u>
Conrail South Anderson Yard	Main Street & Andover Road
Ind Bell Tel Co Anderson 64X	121 East Market

8. Emergency Response Notification System - ERNS records and stores information on reported releases of oil and hazardous substances.

FINDING: According to the databases searched, the Site was not listed in the ERNS.

9. Toxic Chemical Release Inventory System (TRIS) - The TRIS Database identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

FINDING: According to the databases searched, the Site was not listed in the TRIS Database.

10. Superfund (CERCLA) Consent Decrees List - The Superfund (CERCLA) Consent Decrees List identifies major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. The Superfund (CERCLA) Consent Decree is released periodically by United States District Courts after settlement by parties to litigation matters.

FINDING: According to the databases searched, the Site was not listed in the Superfund (CERCLA) Consent Decrees List. No sites within a one-mile radius of the Site were listed in the Superfund (CERCLA) Consent Decrees List.

11. Record of Decision (ROD) - ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

FINDING: According to the databases searched, the Site was not listed in the ROD database. No sites within a one-mile radius of the Site were listed in the ROD database.

12. Delisted NPL - The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the U.S. EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425(e) sites may be deleted from the NPL where no further response is appropriate.

FINDING: According to the databases searched, the Site was not listed on the delisted NPL. No sites within a one-mile radius of the Site were listed on the delisted NPL.

13. Facility Index System (FINDS) - FINDS contains both facility information and "pointers" to other sources that contain more detail. The following FINDS databases are included in this report: CERCLIS; RCRIS; PCS (Permit Compliance System); AIRS (Aerometric Information Retrieval System); FATES (FIFRA and TSCA Enforcement System); FTTS (FIFRA/TSCA Tracking System); DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes, FURS (Federal Underground Injection Control); FRDS (Federal Reporting Data System); SIA (Surface Impoundments); CICS (TSCA Chemicals in Commerce Information System); RCRA-J (medical waste transporters/disposers); and PADS (PCB Activity Data System).

FINDING: According to the databases searched, the Site was not listed in the FINDS.

The following sites were listed in the FINDS, but could not be located with respect to the Site by EDR due to incomplete address information:

<u>Facility</u>	<u>Address</u>
Conrail South Anderson Yard	Main Street & Andover Road
Ind Bell Tel Co Anderson 64X	121 East Market

14. Hazardous Materials Information Reporting System (HMIRS) - The HMIRS contains hazardous material spill incidents reported to the Department of Transportation. The source of this database is the U.S. EPA.
FINDING: According to the databases searched, the Site was not listed in the HMIRS.
15. Material Licensing Tracking System (MLTS) - The MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements.
FINDING: According to the databases searched, the Site was not listed in the MLTS.
16. Mines Master Index File (MINES) - The MINES is maintained by the Department of Labor, Mine Safety and Health Administration.
FINDING: According to the databases searched, the Site was not listed in the MINES. No sites within a quarter-mile radius of the Site were listed in the MINES.
17. PCB Activity System (PADS) - PADS identifies generators, transporters, commercial stores and/or brokers and disposers of PCBs who are required to notify the U.S. EPA of such activities.
FINDING: According to the databases searched, the Site was not listed in the PADS.
18. RCRA Administrative Action Tracking System (RAATS) - RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the U.S. EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. The U.S. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.
FINDING: According to the databases searched, the Site was not listed in the RAATS.
19. Toxic Substances Control Act (TSCA) List – The TSCA List identifies manufacturers and importers of chemical substances included on the TSCA

Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

FINDING: According to the databases searched, the Site was not listed on the TSCA List.

20. FIFRA/TSCA Tracking System (FTTS) – FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act) over the previous five years.

FINDING: According to the databases searched, the Site was not listed in the FTTS.

2.1.2 STATE DATABASES

1. Underground Storage Tank (UST) Database – USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program.

FINDING: According to the databases searched, the Site was not listed in the UST Database. One adjacent site was listed in the UST Database, this being Amacor located at 1820 East 32nd Street, which was listed as having one permanently out of service gasoline UST. No other sites within a quarter-mile radius of the Site were listed in the UST Database.

The following sites were listed in the UST Report but could not be located due to incomplete address information:

<u>Facility</u>	<u>Address</u>
INDOT Alexandria Unit	SR 9 and SR 28
INDOT Anderson Subdistrict	SR 32 and SR 109
Delphi Energy Plant 17	2902 SR 9
Sears Roebuck and Co. #2140	2109 SR 9 S

2. Leaking Underground Storage Tank Sites (LUST) Report - The LUST Report contains an inventory of reported leaking underground storage tank incidents.

FINDING: According to the databases searched, the Site was not listed in the LUST Report. One adjacent site was listed in the LUST Report, this being Amacor located at 1820 East 32nd Street, which was listed as having a No Further Action status under the 1994 Guidance. Impacts were limited to soil and the

Amacor facility was issued a low priority status. The following additional sites within a half-mile radius of the Site were listed in the LUST Report:

<u>Facility</u>	<u>Address</u>	<u>Status</u>
Delphi Energy	2911 Scatterfield Drive	NFA-94 Guidance
Delco Remy Plt 16	2316 Jefferson Street	MNA
Delco Remy Plt 18	2900 S. Scatterfield Road	Active
General Motors Plt 20	2620 East 38 th Street	Discontinued

3. Solid Waste Facility List - The Solid Waste Facility List contains an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

FINDING: According to the databases searched, the Site was not on the Solid Waste Facility List. No sites within a half-mile radius of the Site were on the Solid Waste Facility List.

4. State Hazardous Waste Sites List – State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS List. Priority sites planned for cleanup using state funds are identified along with sites where cleanup will be paid for by the potentially responsible parties.

FINDING: According to the databases searched, the Site was not on the State Hazardous Waste Sites List. No sites within a one-mile radius of the Site were on the State Hazardous Waste Sites List.

5. Voluntary Remediation Program Site List (referred to as the VCP Database) – The VCP Database includes a current listing of Voluntary Remediation Program sites that are no longer confidential.

FINDING: According to the databases searched, the Site was not listed in the VCP Database. No sites within a half-mile radius of the Site were listed in the VCP Database.

6. State NPL Sites List – State NPL site records are the states' equivalent to the Federal NPL.

FINDING: The State of Indiana does not maintain a State NPL Sites List.

Based on the review of the environmental database search results, no PAORs or PAOCs were identified associated with the Site or surrounding properties.

2.2 PUBLIC RECORD REVIEW RESULTS

Public records reviewed during this Phase I ESA include those presented in Section 2.1, which were reviewed during the environmental database search; the City of Anderson zoning map, as presented in Section 1.4.6; Sanborn maps, as presented in Section 2.3.1; historical aerial photographs as presented in Section 2.3.3; topographic maps, as presented in Section 2.3.4; and the NWIM, as presented in Section 1.4.5. Additionally, local representatives were contacted as presented in the subsections below.

2.2.1 U.S. EPA

The U.S. EPA was not contacted during this Phase I ESA. No information reviewed in the environmental database search, historical records review, or during the on-Site records review warranted contacting the U.S. EPA for additional information regarding the Site.

2.2.2 STATE AGENCY

The IDEM was not contacted during this Phase I ESA. No information reviewed in the environmental database search, historical records review, or during the on-Site records review warranted contacting the IDEM for additional information regarding the Site.

2.2.3 LOCAL MUNICIPALITY

The City of Anderson zoning map was reviewed at the local municipality (see Section 1.4.6). A portion of the local zoning map is presented in Appendix C.

Historical aerial photographs were also obtained and reviewed from EDR, the Madison County Surveyors and Assessors office, and the Madison County Natural Resource Conservation Service (NRCS) office (see Section 2.3.3).

2.3 HISTORICAL RECORDS REVIEW

2.3.1 SANBORN FIRE INSURANCE MAPS

Sanborn Fire Insurance Maps assist in the identification of historic land use and commonly indicate the existence and location of aboveground and underground storage tanks, structures, improvements and facility operations. No Sanborn Maps were reported to be available for the Site in the EDR Historic Map Collection.

A copy of the Sanborn Map search result is presented in Appendix E.

2.3.2 PROPERTY TITLE SEARCH

Historical property title information was not available from GM.

2.3.3 AERIAL PHOTOGRAPHS

Aerial photographs were reviewed to document the general development of the Site and properties in the vicinity of the Site and to identify potential on-Site solid waste disposal areas, fill areas, and any other suspect activities or developments. Aerial photographs of the Site and surrounding areas were obtained for the years 1939, 1956, 1959, 1961, 1975, 1987, 1992, 1994, 1997, 2002, and 2003 from EDR, the Madison County Surveyor and Assessors Office, and the Madison County USDA. Copies of the 1959, 1987, 1992, 1998, and 2003 aerial photographs are presented in Appendix F. Other aerial photographs were not presented due to size and/or quality.

The 1939 aerial photograph was reviewed at an unknown scale and depicts the Site as a single structure residential property. Vacant land is present adjacent to the east and west of the Site. The Conrail railroad is present to the north of the Site, with vacant land located beyond. East 32nd Street is present to the south of the Site, with residential properties located beyond. Former Delphi Plant 3 is located to the north of the Site.

The 1956 aerial photograph was reviewed at a scale of one inch equals 660 feet and depicts the Site as essentially unchanged from the 1939 aerial photograph, with the exception that some clearing appears to have taken place. The adjacent property to the east remains vacant; however, appears to have been cleared. A commercial type structure and associated parking areas are present to the west of the Site. Residential

properties have been constructed to the north of the Site, across the Conrail railroad. Former Delphi Plants 7, 10, and 11 have been constructed to the north and northeast of the Site. A coal pile is located to the northeast of the Site.

The 1959 aerial photograph was reviewed at a scale of one inch equals 700 feet and depicts the Site as vacant land. The surrounding properties appear essentially unchanged from the 1956 aerial photograph.

The 1961 aerial photograph was reviewed at an unknown scale and depicts the Site as having some areas of land disturbance. Areas of disturbance are present to the northeast of the Site. The remainder of the surrounding properties on the aerial photograph appears essentially unchanged from the 1959 aerial photograph.

The 1975 aerial photograph was reviewed at a scale of one inch equals 200 feet and depicts the Site as having the former water tank and associated pump house structures. Plant 19 (currently Amacor) has been constructed to the east of the Site. The remainder of the surrounding properties on the aerial photograph appear essentially unchanged from the 1961 aerial photograph.

The 1987 aerial photograph was reviewed at a scale of one inch equals 660 feet and depicts the Site and surrounding properties as essentially unchanged from the 1975 aerial photograph.

The 1992 aerial photograph was reviewed at a scale of one inch equals 700 feet and depicts the Site and surrounding properties as essentially unchanged from the 1987 aerial photograph.

The 1994 aerial photograph was reviewed at a scale of one inch equals 660 feet and depicts the Site and surrounding properties as essentially unchanged from the 1992 aerial photograph.

The 1997 aerial photograph was reviewed at a scale of one inch equals 400 feet and depicts the Site and surrounding properties as essentially unchanged from the 1994 aerial photograph with the exception that Delphi Plants 7 and 10 have been razed.

The 1998 aerial photograph was reviewed at a scale of one inch equals 700 feet and depicts the Site and surrounding properties as essentially unchanged from the 1997 aerial photograph.

The 2002 aerial photograph was reviewed at an unknown scale and depicts the Site and surrounding properties as essentially unchanged from the 1998 aerial photograph, with the exception that the adjacent Anderson Power and Light substation is under construction.

The 2003 aerial photograph was reviewed at a scale of one inch equals 700 feet and depicts the Site and surrounding properties as essentially unchanged from the 2002 aerial photograph.

Based on the review of available aerial photographs, no PAOCs or PAORs were identified associated with the Site or adjoining properties.

2.3.4 HISTORICAL TOPOGRAPHIC MAPS

Historical topographic maps were reviewed to assist in the identification of historic land use, to document the general development of the Site and properties in the vicinity of the Site, and to identify potential on-Site fill activities. The 1961, 1981 (photorevised 1961), and 1994 (photorevised 1961) historical topographic maps were obtained from EDR and were reviewed by CRA. All topographic maps were reviewed at a scale of one inch equals 2,000 feet. Copies of available historical topographic maps are presented in Appendix G.

On the 1961 topographic map, the Site is depicted as vacant land with no structures present. A residential-type structure is located to the west of the Site. Four of the Delphi plants are present to the north and east of the Site. 32nd Street is present to the south of the Site. The Conrail railroad is present to the north of the Site. Residential structures and vacant land are present to the east of the Site, along with the aforementioned Delphi plants. The properties to the west and south of the Site are depicted as urban land, and as such, the density of the structures generally does not include the identification of individual residential-type structures.

On the 1981 (photorevised 1961) topographic map, the Site is depicted as having a tank in the central portion. The Amacor plant has been constructed immediately to the east of the Site. Additions have been constructed on the Delphi plants to the north and east of the Site.

On the 1994 (photorevised 1961) topographic map, the Site and surrounding properties appear essentially unchanged from the 1981 topographic map.

Based on the review of available historical topographic maps, no PAOCs or PAORs were identified associated with the Site and adjoining properties.

2.3.5 CITY DIRECTORY SEARCH

A city directory search was conducted by EDR from the earliest available directory to the present. Available directories were reviewed at approximately five-year intervals starting in 1937 and ending in 2005. A copy of the city directory search results are presented in Appendix H. The Site was not listed in the 1937, 1947, 1967, 1985, 1990, 1995, 2000, or 2005 city directories.

A City Directory Search was also conducted for surrounding properties during the specified time periods. East 27th Street was listed in the 1967 Mullin-Kille City Directory. No other streets were listed in the remaining directories. The following entities were identified as surrounding properties during the specified time periods.

<u>Date</u>	<u>Address</u>	<u>Listed Business Entity</u>
1937	1711 East 32 nd Street	Address Not Listed
	1717 East 32 nd Street	Address Not Listed
	1721 East 32 nd Street	Address Not Listed
	1800 East 32 nd Street	Address Not Listed
	1802 East 32 nd Street	Address Not Listed
	1806 East 32 nd Street	Address Not Listed
	1815 East 32 nd Street	Address Not Listed
	1820 East 32 nd Street	Address Not Listed
	1828 East 32 nd Street	Address Not Listed
	1904 East 32 nd Street	Address Not Listed
	1928 East 32 nd Street	Address Not Listed
1947	1711 East 32 nd Street	Address Not Listed
	1717 East 32 nd Street	Address Not Listed
	1721 East 32 nd Street	Address Not Listed
	1800 East 32 nd Street	Residence
	1802 East 32 nd Street	Residence
	1806 East 32 nd Street	Residence
	1815 East 32 nd Street	Residence
	1820 East 32 nd Street	Address Not Listed
	1828 East 32 nd Street	Address Not Listed

Privileged and Confidential
Prepared at General Motors Counsel's Request

	1904 East 32 nd Street	Address Not Listed
	1928 East 32 nd Street	Address Not Listed
1967	1711 East 32 nd Street	Address Not Listed
	1717 East 32 nd Street	Address Not Listed
	1721 East 32 nd Street	Address Not Listed
	1800 East 32 nd Street	Residence
	1820 East 32 nd Street	Address Not Listed
	1828 East 32 nd Street	Residence
	1904 East 32 nd Street	Vacant
	1928 East 32 nd Street	Residence
1985	1711 East 32 nd Street	No Information
	1717 East 32 nd Street	Residence
	1721 East 32 nd Street	Address Not Listed
	1800 East 32 nd Street	Residence
	1820 East 32 nd Street	Address Not Listed
1990	1711 East 32 nd Street	No Information
	1717 East 32 nd Street	Residence
	1721 East 32 nd Street	Address Not Listed
	1820 East 32 nd Street	Address Not Listed
1995	1711 East 32 nd Street	Residence
	1717 East 32 nd Street	Residence
	1721 East 32 nd Street	Residence
	1820 East 32 nd Street	Address Not Listed
2000	1711 East 32 nd Street	Not Verified
	1717 East 32 nd Street	Residence
	1721 East 32 nd Street	Residence
	1820 East 32 nd Street	Delphi Automotive Systems
2005	1711 East 32 nd Street	Residence
	1717 East 32 nd Street	Residence
	1721 East 32 nd Street	Residence
	1820 East 32 nd Street	Address Not Listed

Based on the review of city directories, no PAOCs or PAORs were identified associated with the Site or surrounding properties.

2.4 SITE FILES

According to individuals associated with the Site, no documents regarding the environmental condition of the Site exist.

2.4.1 FILES

According to individuals associated with the Site, no files regarding the environmental condition of the Site exist.

2.4.2 VARIOUS CORRESPONDENCE /OTHER DOCUMENTATION

The following report was obtained by CRA from individuals associated with the Site and was reviewed:

- *Phase I Environmental Site Assessment GM Delphi-E Plant 19* prepared by EMCON and dated February 18, 1998.

Based on the review of EMCON's Phase I ESA, no PAOCs were identified at the Plant 19 property. Therefore, no issues were identified at the adjacent Plant 19 property that could potentially impact the Site. It should be noted that the Site was not included in the Phase I ESA conducted for the Plant 19 property.

2.4.3 DRAWINGS

No drawings were reviewed during the development of this Phase I ESA.

2.4.4 PERMITS

According to individuals associated with the Site, no environmental permits are currently maintained by the Site. The Site is comprised of a vacant property that does not require any permits.

3.0 SITE RECONNAISSANCE

The Site inspection was performed by Ms. Jennifer Quigley of CRA on February 2, 2007. The Site inspection included an inspection of the Site and surrounding properties, discussions with various individuals associated with the Site, and a review of available documentation associated with the Site. Site photographs were taken during the Site inspection and are presented in Appendix I.

3.1 SPECIAL PROCESSES AND EQUIPMENT

Based on discussions with individuals associated with the Site, observations made during the Site inspection and review of available information, there are currently no special processes or equipment associated with the Site.

Historically, a fire pump house and water tank were present on the Site and served the adjacent former Delphi Energy and Engine Management Systems (Delphi) plants, located to the east-northeast of the Site. The use of the pump house and water tank was discontinued and in January 2007, the pump house and the water tank were decommissioned and demolished. Additionally, a 30-inch water supply well was formerly located on the property, which was reportedly used as a source of mill water for the former adjacent Delphi plants. The water supply well was abandoned in January 2007. Prior to development as a fire pump house and water tank in the 1970s, the Site was reportedly vacant land. Based on the review of available information, and discussions with individuals associated with the Site, no other historical operations, including special processes and equipment, were utilized on the Site.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with special processes and equipment.

3.2 UTILITY SERVICES

According to individuals associated with the Site, no utility services are currently provided to the Site, with the exception of storm sewer service.

According to individuals associated with the Site, electricity and natural gas in the vicinity of the Site are provided by Anderson Power and Light and Vectron, respectively.

Potable water is supplied in the vicinity of the Site by the City of Anderson. According to individuals associated with the Site and based on observations during the Site inspection, no water supply, dry, or monitoring wells are currently present at the Site. Historically, a 30-inch water supply well was formerly located on the property, which was reportedly used as a source of mill water for the former adjacent Delphi plants. The water supply well was abandoned in January 2007.

No sanitary wastewater is generated at the Site. According to individuals associated with the Site, there are no on-Site septic systems and no evidence of a septic system was observed by CRA during the Site inspection. Sanitary sewer service in the vicinity of the Site is provided by the City of Anderson combined sewer system.

Stormwater generated at the Site infiltrates undeveloped Site surfaces or flows via sheetflow to a stormwater catchbasin located on the northeastern portion of the Site. The catchbasin discharges to the City of Anderson combined sewer system.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with utility services.

3.3 UNDERGROUND STORAGE TANKS (USTs)

Individuals associated with the Site were unaware of any current USTs operated at the Site. CRA did not observe any physical evidence (e.g., vent pipes, fill ports, etc.) of USTs during the Site inspection. No information regarding potential historical heating oil UST use at former residence was available. The Site was not listed in the UST or LUST databases as having USTs or releases therefrom.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with USTs.

3.4 ABOVE GROUND STORAGE TANKS (ASTs)

According to individuals associated with the Site and available information, no ASTs are currently present at the Site. No evidence of any current or historic ASTs (e.g., foundations, pipes, etc.) was observed by CRA personnel during the Site inspection. Historically, a fire pump house and water tank were present on the Site and served the

adjacent former Delphi Energy and Engine Management Systems (Delphi) plants, located to the east-northeast of the Site. The use of the pump house and water tank was discontinued and in January 2007, the pump house and the water tank were decommissioned and demolished. The former water tank was a 250,000-gallon insulated steel AST. In addition, an approximate 250-gallon diesel fuel single-walled steel AST was formerly located in the pump house as a fuel source. The AST was contained within the pump house structure. Individuals associated with the Site indicated that no releases occurred from the former diesel fuel AST.

No information regarding potential historical heating oil AST use at former residence was available.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with ASTs.

3.5 RAW MATERIAL USAGE AND STORAGE

According to individuals associated with the Site and based on observations made during the Site inspection, there is currently no use or storage of raw materials on Site. Historical chemical usage included diesel fuel (see Section 3.4).

There are no agricultural chemicals stored on Site. Based on available information, the Site may have historically used as cultivated farmland. Based on the historic use of the Site as cultivated farmland, agricultural chemicals such as pesticides, herbicides, and fertilizers would have historically been used on the Site. Information regarding historic use, storage, or application rates was not available. If the chemicals were applied in accordance with manufacturer recommendations, residuals remaining in Site soils would be expected to be similar to other area properties. No information was available to determine whether residual concentrations exceeded government use or exposure criteria.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with raw material use and storage.

3.6 SOLID WASTE HANDLING/STORAGE AND DISPOSAL

According to individuals associated with the Site and based on observations made during the Site inspection, no solid waste is currently handled, stored, or disposed of at the Site.

According to Site personnel, no on-Site disposal of solid non-hazardous waste has occurred at the Site. No evidence of the on-Site disposal of solid non-hazardous waste was observed by CRA during the Site inspection. No information regarding the potential use of demolition debris as backfill material during demolition of the former residential structure was available.

Based on the information reviewed during the Phase I ESA, the potential historical use of demolition debris as backfill material is PAOR No. 1. No PAOCs were identified associated with solid waste handling/storage and disposal. Locations of PAORs are presented on Figure 3.1.

3.7 HAZARDOUS WASTE HANDLING/STORAGE AND DISPOSAL

According to individuals associated with the Site and based on observations made during the Site inspection, no hazardous waste is currently handled, stored, or disposed at the Site. The Site is not listed in the environmental database search results as a hazardous waste generator, or treatment, storage, or disposal facility, or as the subject of a RCRA CA.

An Amacor facility (formerly Xstrata Magnesium Corporation) is located to the west of the Site. Prior to operation of this adjacent property by Amacor and Xstrata, it was operated by Delphi Plant 19, which historically included the Site. Plant 19 was included in the RCRA Corrective Action investigation activities conducted for the "Acre Area". Based on the review of available documentation, Plant 19 was removed from the required RCRA CA activities, no investigation was required, and was sold in 1999, with GM retaining ownership of the Site. As such, the Site is no longer part of the "Acre Area" RCRA CA.

According to Site personnel, no on-Site disposal of hazardous waste has occurred at the Site. No evidence of the on-Site disposal of hazardous waste was observed by CRA during the Site inspection.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with hazardous waste handling / storage and disposal.

3.8 POLYCHLORINATED BIPHENYLS (PCBs)

Site personnel were not aware of any PCB-containing electrical or hydraulic equipment currently located at the Site. No potential PCB-containing equipment was observed on the Site by CRA during the Site inspection. Based on discussions with individuals associated with the Site, three pole-mounted transformers were formerly located on the Site, which owned by Anderson Power and Light and were removed by the utility in December 2006. Individuals associated with the Site indicated that these transformers were labeled as non-PCB.

Based on observations during the Site inspection, one pole-mounted transformer is present along the western property boundary, which is owned by Anderson Power and Light. The transformer was labeled as non-PCB, with no staining or distressed vegetation in the general vicinity or any evidence of any leakage. The transformer is owned by Anderson Power and Light and would be the utility's responsibility for any reporting, inspections, testing, or release response.

Individuals associated with the Site indicated that the lighting in the former pump house structures was incandescent; therefore, no ballasts were utilized at the Site.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with PCBs.

3.9 ASBESTOS CONTAINING MATERIAL (ACM)

An ACM survey was not conducted as part of this Phase I ESA.

The Site is vacant and no structures are located at the Site. CRA did not observe any physical evidence of ACM during the Site inspection. Individuals associated with the Site indicated that there was no potential LBP on the former pump house structures. No information regarding the potential presence of ACM use at former residence was available. No information regarding the demolition procedures of the former residential structure was available.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with ACM.

3.10 INDUSTRIAL WASTEWATER/SANITARY SEWERS

According to individuals associated with the Site, and based on observations made during the Site inspection and review of available information, there is currently no industrial or sanitary wastewater generated at the Site.

Based on the review of available documentation, no industrial process lines are currently or were historically present at the Site.

Based on the review of available documentation and discussions with individuals associated with the Site, sanitary sewer lines are present beneath the existing streets adjacent to the Site. The Site does not discharge to these sanitary sewer lines. These lines discharge to the City of Anderson Publicly Owned Treatment Works (POTW).

No information regarding historical domestic sanitary wastewater discharges was available, including information regarding the potential presence of historical septic systems at the former residential property.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with industrial wastewater / sanitary sewer system.

3.11 STORMWATER

Based on CRA's observations during the Site inspection, stormwater consists of precipitation that flows via sheet flow to a stormwater catch basins located on the northeastern portion of the Site or infiltrates undeveloped Site surfaces. The off-Site catch basins discharge to the City of Anderson combined sewer system and eventually to the City of Anderson POTW. No evidence of industrial activity that would have the potential to impact stormwater was observed by CRA during the Site inspection and, furthermore, stormwater discharges to the City of Anderson combined sewer system and eventually to the POTW.

Based on information reviewed during this Phase I ESA, no PAOCs or PAORs were identified associated with stormwater.

3.12 AIR EMISSIONS

According to individuals associated with the Site and based on observations made during the Site inspection, the Site currently has no air emissions sources.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with air emissions.

3.13 IONIZING RADIATION

No commercial sources of ionizing radiation (e.g., fill level controllers) were observed by CRA personnel during the Site inspection.

The U.S. EPA has determined that Madison County has a predicted average indoor screening level for radon gas of greater than 4 pCi/L. The residential screening level recommended by the U.S. EPA is 4 pCi/L. The Site does not have any structures and, therefore, no belowgrade structures or basements.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with ionizing radiation; however, the potential presence of radon gas at concentrations exceeding the U.S. EPA threshold is a Site development issue.

3.14 PERMITS

According to individuals associated with the Site and information reviewed, the Site currently does not maintain any permits.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with permits.

3.15 SPILL REPORTS/RELEASES

According to individuals associated with the Site and based on information reviewed, there have not been any reportable spills/releases at the Site. CRA did not observe any staining at the Site. The Site was not listed on the ERNS.

Based on information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with spill reports/releases.

3.16 EMPLOYEE RIGHT TO KNOW (ERTK)/HEALTH AND SAFETY

No hazardous substances or maintenance products are used or stored at the Site. The Site is vacant and ERTK/Health and Safety issues are not applicable.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with ERTK/health and safety.

**3.17 SARA TITLE III – EMERGENCY PLANNING AND COMMUNITY
RIGHT TO KNOW ACT (EPCRA)**

The Site has not made any notifications under Sections 311, 312, or 313 of EPCRA. No chemicals were identified at the Site; therefore, the Site is not subject to reporting pursuant to EPCRA.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with EPCRA.

3.18 WELLS

According to individuals associated with the Site and based on information reviewed, there are no water supply wells, dry wells, or monitoring wells at the Site. Historically, a 30-inch water supply well was formerly located on the property, which was reportedly used as a source of mill water for the former adjacent Delphi plants. The water supply well was abandoned in January 2007. No information was available regarding a historical water supply well potentially utilized at the former residence located at the Site.

Based on information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with wells.

3.19 LEAD BASED PAINT (LBP)

A LBP survey was not conducted as part of this Phase I ESA.

The Site is vacant and no structures are located at the Site. CRA did not observe any physical evidence of LBP during the Site inspection. Individuals associated with the Site indicated that there was no potential LBP on the former pump house structures. No information regarding the potential presence of LBP use at the former residence was available. No information regarding the demolition procedures of the former residential structure was available.

Based on the information reviewed during the Phase I ESA, no PAOCs or PAORs were identified associated with LBP.

4.0 SUMMARY OF ENVIRONMENTAL CONDITIONS

4.1 PAOCS

Based on the Phase I Environmental Site Assessment, including the Site inspection, information provided by individuals associated with the Site, documents reviewed, and the environmental database searches, no PAOCs were identified at the Site.

4.2 PAORS

Based on the Phase I Environmental Site Assessment, including the Site inspection, information provided by Individuals associated with the Site, documents reviewed, and the environmental database searches, the following PAOR was identified at the Site.

1. **Former Residential Property:** Based on the review of aerial photographs, and discussions with individuals associated with the Site, the Site was utilized as a residential property prior to the construction of the water tank and associated pump house. No information regarding historical use of heating oil USTs or ASTs, or property demolition procedures was available to CRA.

4.3 ADDITIONAL POTENTIAL ENVIRONMENTAL ISSUES

Based on the Phase I Environmental Site Assessment, including the Site inspection, information provided by Individuals associated with the Site, documents reviewed, and the environmental database searches, the following other potential environmental issue were identified at the Site.

1. **Radon:** The U.S. EPA has determined Madison County to be in a Level 1 radon zone with indoor air concentrations of radon anticipated to be greater than 4 pCi/L. The U.S. EPA established action level for radon gas is 4 pCi/L. No basements or below-grade structures are currently present at the Site; however, the potential presence of radon concentrations greater than the U.S. EPA threshold could impact future development at the Site.

5.0 CONCLUSIONS

A Phase I ESA was conducted for the vacant lot (Key Code 18 9999-1B-01) located near the intersection of Hamilton Place and 32nd Street in Anderson, Indiana. The Phase I ESA identified one PAOR and one other environmental issue, as presented in Section 4.0.

PAORs

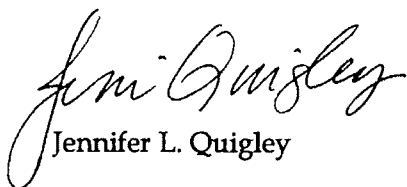
1. Former Residential Property

Other Environmental Issue

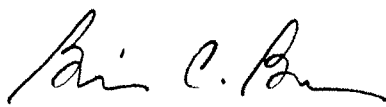
1. Radon

6.0 CERTIFICATION

We certify that this Phase I ESA has been completed in accordance with good commercial and customary practices in accordance with GM specifications and in general accordance with the ASTM Standard E1527-00 for conducting environmental assessments.



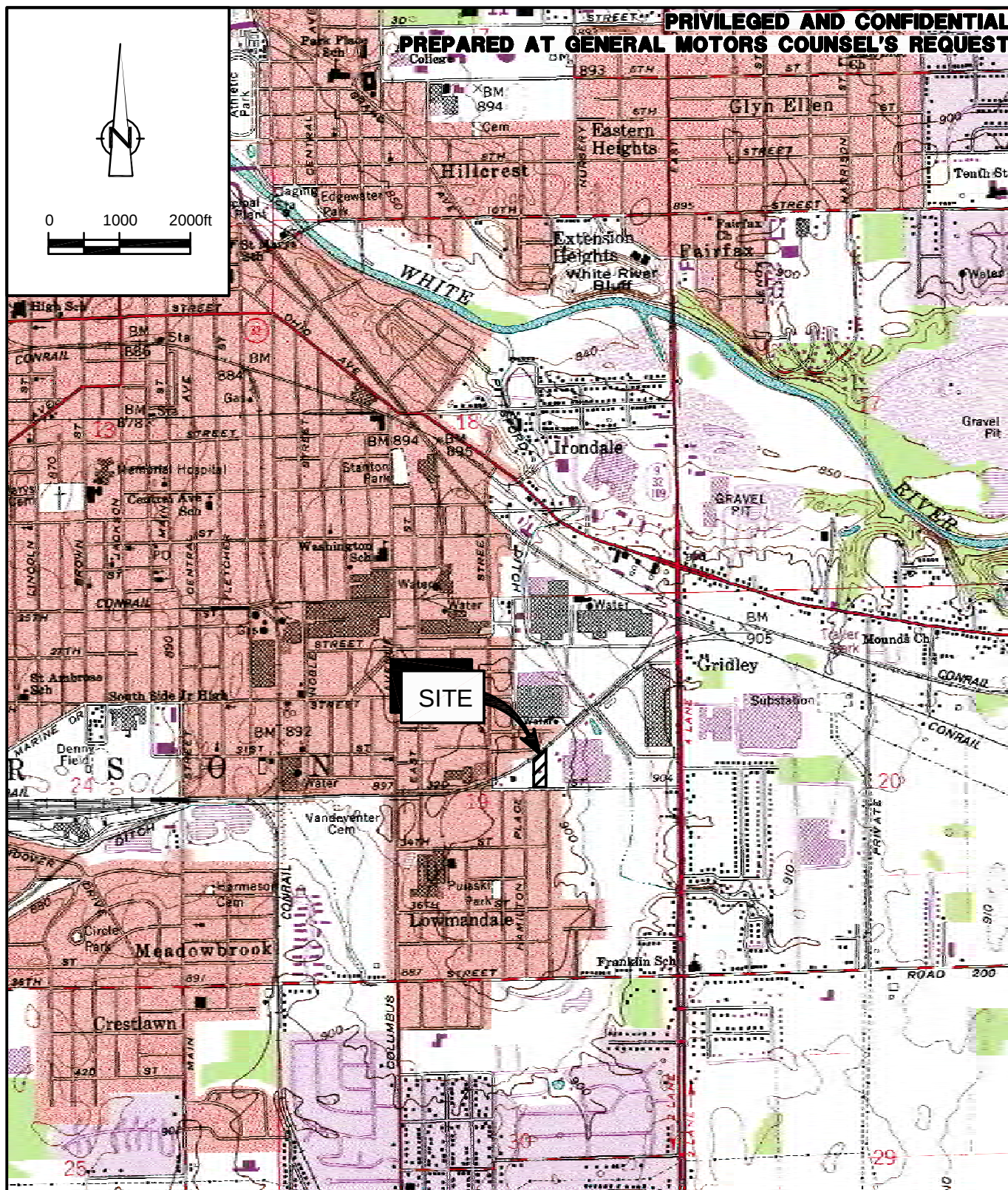
Jennifer L. Quigley



Brian C. Boevers

7.0 REFERENCES

- ASTM Standard E1527-00, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.
- Interviews with Site personnel including Mr. Steve Weflen (Delphi Senior Environmental Engineer) and Mr. Paul McConnell;
- National Wetland Inventory Map for Anderson South, Indiana; and
- Environmental Database Search for the Site and the surrounding area conducted by EDR, dated September 29, 2004.



SOURCE: USGS QUADRANGLE MAP;
ANDERSON SOUTH, INDIANA

figure 1.1

SITE LOCATION
VACANT LOT
KEY CODE 9999-1B-01
Anderson, Indiana



