



**QUARTERLY TECHNICAL PROGRESS REPORT  
JULY 2011 – SEPTEMBER 2011  
RCRA CORRECTIVE ACTION  
IND 980 700 801**

**2915 DR. MARTIN LUTHER KING JR. BOULEVARD, ANDERSON, IN  
REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL  
RESPONSE TRUST**

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

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**Prepared by:  
Conestoga-Rovers  
& Associates**

261 Martindale Road, Unit 3  
St. Catharines, Ontario  
Canada L2W 1A2

Office: (905) 682-0510  
Fax: (905) 682-8818

web: <http://www.CRAworld.com>

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## 1.0 INTRODUCTION

Conestoga-Rovers and Associates (CRA), on behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust, has prepared this Quarterly Technical Progress Report for the RACER Trust 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 July through September 2011.

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

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### **2.1 RCRA FACILITY INVESTIGATION/ENVIRONMENTAL INDICATORS DETERMINATION**

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RFI activities conducted during this reporting period are related to responding to the Indiana Department of Environmental Management's (IDEM's) comments on the Final RFI Report (EarthTech and ENVIRON, September 2007) and preparation and submittal of work plans for additional investigation work as detailed in the following paragraphs.

The RFI activities are considered 95-percent completed.

#### **2.1.1 FINAL RFI REPORT**

In response to IDEM's 13 comments on toxicity (IDEM, October 27, 2009), RACER Trust agreed to modify the Final RFI Report. Though these modifications necessitated revisions to several tables, they did not affect the conclusions presented in the Final RFI Report. The revised Final RFI Report was submitted to IDEM on July 8, 2011. IDEM issued additional comments on the revised Final RFI Report on September 14, 2011, which are currently being addressed.

#### **2.1.2 ADDITIONAL INVESTIGATIONS**

On July 7, 2011, the RACER Trust submitted an Investigation Work Plan to IDEM for proposed surface and sub-surface soil and groundwater investigations at the Site. The RACER Trust received IDEM's comments on the Investigation Work Plan on August 15, 2011, and submitted a Revised Investigation Work Plan for IDEM's review on September 2, 2011. The Revised Investigation Work Plan, which includes delineation of chromium impacted soil and perched groundwater at the former Bay M26/M27 area, investigation of the 310 Plater Pit area, delineation of the horizontal and vertical extent of ten areas of stained soil identified beneath the former concrete floor slab at the time of building demolition, and general surface soil screening in the northern portion of the former manufacturing building, was approved by IDEM on September 15, 2011. Field activities are anticipated in November 2011.

On September 1, 2011, the RACER Trust submitted a Residential Vapor Intrusion Assessment Work Plan to IDEM for soil and groundwater investigations at a residential property located downgradient of the Site to assess the potential for vapor intrusion

risks due to chlorinated volatile organic compound (VOC) impacts in nearby groundwater. The Vapor Intrusion Assessment Work Plan was approved by IDEM on October 5, 2011. Field activities are anticipated in November 2011.

## **2.2        INTERIM MEASURES**

On June 8, 2011, the RACER Trust responded to IDEM's April 21, 2011 comments on the 2010 Annual Groundwater Monitoring Report, summarizing the groundwater and surface water activities performed in 2010 in accordance with the Site-Wide Groundwater Monitoring Plan (AECOM, August 2010). On July 5, 2011, IDEM provided comments on the RACER Trust's June 8, 2011 responses to IDEM comments. The additional IDEM comments were provided for clarification. No additional communication regarding the 2010 Annual Groundwater Monitoring Report is warranted. The RACER Trust received IDEM's comments on their response on July 5, 2011. IDEM's comments indicated that no further response was necessary.

On July 28, 2011, three surface water samples, including one field duplicate, were collected at the irrigation pond at the Meadowbrook Golf Course in accordance with the Site-Wide Groundwater Monitoring Plan, the results of which are discussed in Section 3.2 below.

Interim measures are ongoing.

## **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 (CRA, March 2008, the corrective measures activities have not commenced and are considered 0-percent complete.

### **3.0 SUMMARY OF FINDINGS**

#### **3.1 RCRA FACILITY INVESTIGATION/ENVIRONMENTAL INDICATORS DETERMINATION**

In February and March 2011, the Vapor Intrusion Study Work Plan was implemented with some modification to the locations of indoor air samples, as discussed with and approved by IDEM. The data were evaluated by the RACER Trust and its consultants and indicate that there is currently no unacceptable risk due to groundwater volatilization to indoor air at the former Plant 9 building. A technical memorandum presenting the field activities conducted, analytical data generated therefrom, and a discussion of the validated analytical results will be provided to IDEM under separate cover.

#### **3.2 INTERIM MEASURES**

The surface water samples collected on July 28, 2010 from the irrigation pond on the Meadowbrook Golf Course exhibited detectable concentrations of vinyl chloride ranging from 4.2 to 8.8 micrograms per liter ( $\mu\text{g/L}$ ). No other analyzed parameters were detected above the associated reporting limits. The concentrations of vinyl chloride are below the site-specific residential non-potable groundwater use criteria (i.e.,  $46.3 \mu\text{g/L}$ ).

#### **3.3 CORRECTIVE MEASURES**

No corrective measures activities were conducted during this reporting period.

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

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In addition to the RFI activities previously conducted and summarized in the Final RFI Report, additional investigation is proposed in the following areas:

- Bay M26/M27
- 310 Plater Pit
- Visually impacted soil areas (ten)
- Former main manufacturing building (northern portion)
- Residential vapor intrusion pathway

Field work is anticipated in November 2011.

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

A conference call was attended by representatives of IDEM, the RACER Trust, and the RACER Trust's consultants on September 27, 2011 to discuss IDEM's September 14, 2011 comments on the revised Final RFI Report.

Representatives of RACER Trust met with the owner of 3233 Dr. Martin Luther King Jr. Blvd. in August 2011 to obtain access to the residential property related to the September 1, 2011 Residential Vapor Intrusion Work Plan. The access agreement was executed on August 18, 2011.



## **6.0     SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS**

No problems were encountered during the reporting period.

## 7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS

No problems were encountered during the reporting period.

## 8.0 CHANGES IN PERSONNEL

There were no changes to personnel during the reporting period.

## 9.0 PROJECTED WORK FOR OCTOBER THROUGH DECEMBER 2011

Projected work for October through December 2011 includes the following:

- Implementation of the Revised Investigation Work Plan and Residential Vapor Intrusion Assessment Work Plan
- Site-wide hydraulic monitoring, semi-annual groundwater sampling, and fall surface water sampling in accordance with the Site-Wide Groundwater Monitoring Plan
- Submittal of the Vapor Intrusion Study Technical Memorandum
- Approval of the 2012 Budget Request

## **10.0    REPORTS AND DATA**

The revised Final RFI Report was submitted to IDEM on July 8, 2011.

The Quarterly Technical Progress Report, April 2011 through June 2011, was submitted to IDEM on July 22, 2011.

The Residential Vapor Intrusion Assessment Work Plan was submitted to IDEM on September 1, 2011, and approved on October 5, 2011.

The Revised Investigation Work Plan was submitted to IDEM on September 2, 2011, and approved on September 15, 2011.