



**QUARTERLY TECHNICAL PROGRESS REPORT  
JANUARY 2011 - MARCH 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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## 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). Further information regarding the RACER Trust is provided in Section 8.0.

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 January through March 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 implementation of the Vapor Intrusion Study Work Plan and responding to the Indiana Department of Environmental Management's (IDEM's) comments on the Final RFI Report (EarthTech and ENVIRON, September 2007), including several comment response documents between Motors Liquidation Company (MLC) [formerly known as General Motors Corporation (GMC)] and IDEM.

In February and March 2011, the Vapor Intrusion Study Work Plan (CRA, July 2010) was implemented at the former Plant 9 building, located at 1305 West 29th Street, Anderson, Indiana. The Vapor Intrusion Study was implemented to provide a more direct basis for assessing vapor intrusion to indoor air and to provide Site-specific data to support modification of IDEM's generic attenuation coefficients to support the Site-specific risk assessment provided in the RFI Report. The Vapor Intrusion Study included the collection and chemical analysis of groundwater, deep soil gas, sub-slab soil vapor and ambient and indoor air samples, the results of which are discussed in Section 3.0.

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

### **2.2 INTERIM MEASURES**

On November 8, 2010, MLC received IDEM's comments on the 2009 Annual Groundwater Monitoring Report submitted by AECOM, summarizing the groundwater and surface water activities performed in 2009 in accordance with the draft Site-Wide Groundwater Monitoring Plan (AECOM, March 2008). A response to IDEM comments was prepared by MLC and its consultants and submitted to IDEM on January 6, 2011.

The 2010 Annual Groundwater Monitoring Report summarizing the groundwater and surface water sampling activities performed in 2010 was submitted to IDEM on January 31, 2011. Included in the 2010 Annual Groundwater Monitoring Report was

recommendations to expand on sampling program described in the Site-Wide Groundwater Monitoring Plan (AECOM, August 2010), herein referred to as the GMP.

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

### **2.3 CORRECTIVE MEASURES**

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

### 3.0 SUMMARY OF FINDINGS

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

On February 3, 2011, CRA commenced the field activities proposed in the Vapor Intrusion Study Work Plan at the former Plant 9 building. Field activities included advancing three boreholes to the depth of the groundwater table to facilitate the collection of groundwater grab samples in the southwest corner of building nearest the leading edge of the WWTP Area plume. The preliminary groundwater analytical results were provided to IDEM via electronic mail on February 14, 2011.

The groundwater grab sample results indicate detectable concentrations of 1,1-dichloroethane, cis-1,2-dichloroethene and trans-1,2-dichloroethene, however, the results are below the industrial groundwater vapor intrusion screening criteria derived following IDEM's 2006 draft vapor intrusion guidance. Trichloroethene and vinyl chloride were not detected in groundwater grab samples.

The preliminary results of the groundwater grab samples were discussed with IDEM on February 22, 2010. At IDEM's request, sub-slab vapor, deep soil gas, indoor air, and ambient air sampling was conducted on March 4, 2011 to demonstrate that there is currently no unacceptable risk due to groundwater volatilization to indoor air.

Final analytical results, once validated, will be provided to IDEM under separate cover.

#### 3.2 INTERIM MEASURES

Groundwater monitoring activities completed in 2010 were reported to IDEM on January 31, 2011 and included installation of three additional monitoring wells north and east of former Plant 9, collection of Site-wide groundwater level measurements, and monitoring well sampling and analysis in accordance with the GMP. A brief summary of conclusions from the 2010 Site-wide groundwater and surface water monitoring are provided below.

- Existing perimeter wells contained no volatile organic compound (VOC) contaminants above associated laboratory reporting limits in 2010.
- There are significant long term decreasing VOC trends at several wells in and near the South Court source area.

- A decreasing trend for cis-1,2-dichloroethene is apparent near the source area of the former Wastewater Treatment Plant (WWTP) Area plume, however, there are increasing trends for cis-1,2-dichloroethene and vinyl chloride at several monitoring wells scattered throughout the central and southeastern part of the former WWTP Area plume. Increasing trends are particularly prevalent for vinyl chloride in downgradient areas of the plume.
- Vinyl chloride was detected above the screening criteria at two surface monitoring points at the Meadowbrook Golf Course central irrigation pond in August 2010.
- Based on the 2010 monitoring, the golf course irrigation pond appears to be within the former WWTP Area plume, and the plume is expanding in the direction of the pond.

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

As presented in the 2010 Annual Groundwater Monitoring Report, the following changes to routine groundwater and surface water monitoring in accordance with the GMP are proposed:

- Annual Site-wide potentiometric surface monitoring
- Annual sampling of MW86 and MW88
- Locate, repair, and/or abandon missing monitoring wells
- Install a boring/monitoring well near the CSX eastern property boundary to observe and log soil stratigraphy and to collect a groundwater sample for VOC analysis to characterize the groundwater migrating eastward across the CSX property boundary towards neighboring residential properties

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

Communication with the owner of former Plant 9 is ongoing, related to the vapor intrusion investigation.

Communication with IDEM related to past costs, cash forecasts, and the 2011 Budget Authorization Requests was ongoing through much of this reporting period. The 2011 Budget Authorization Request (2011 Request) for the Site was provided to IDEM on December 10, 2010. Representatives of IDEM, MLC, and CRA participated in a conference call on January 6, 2011 to discuss IDEM's comments on their initial review of the 2011 Request. IDEM's written comments on the 2011 Request were received by MLC on January 10, 2011. MLC provided written responses to IDEM's January 10, 2011 comments and a revised 2011 Request on January 19, 2011. IDEM approved the revised 2011 Request, as well as past costs for November 2010 through December 2010 costs on February 16, 2011. IDEM approved the past costs for July 2010 through October 2010 costs on February 25, 2011.

## 6.0 SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS

Though utility drawings were reviewed and drilling locations cleared by a representative for the current owner of former Plant 9, a storm sewer line was punctured during implementation of the Vapor Intrusion Study Work Plan. It was determined that the storm sewer line that was punctured was not represented accurately on the building's utility plan.

No other problems were encountered during the reporting period.

## 7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS

The damaged storm sewer line will be repaired in April 2011 by the RACER Trust and CRA.

## 8.0 CHANGES IN PERSONNEL

As a result of GMC's 2009 bankruptcy, certain operating assets of GMC were sold on July 10, 2009 to a newly formed company known as General Motors LLC. Existing non-continuing assets, including the Facility, became the property of MLC, in its capacity as debtor-in-possession in the bankruptcy case. In October 2010, the United States Government announced that MLC had agreed to resolve its liabilities at 89 sites relating to liabilities under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), RCRA, and the Clean Air Act through an environmental response trust fund. On March 31, 2011, the RACER Trust became effective and will conduct, manage, and fund cleanup at the 89 sites formerly owned by MLC, including the Facility. Effective March 31, 2011, Mr. Robert (Bob) Hare, Cleanup Manager, became the RACER Trust Project Manager for the Site. Mr. Hare's contact information is provided below:

Robert W. Hare, P.E., CHMM  
Cleanup Manager (IL, IN, KS, MO, NJ, WI), RACER Trust  
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Birmingham, MI 48009  
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Phone: 313-486-2928

## 9.0 PROJECTED WORK FOR APRIL THROUGH JUNE 2011

Projected work for April through June 2011 includes the following:

- Preparation and submittal of revisions to the Final RFI Report to address IDEM's October 27, 2009 comments on toxicity
- Review of soil vapor and indoor and ambient air data collected during implementation of the Vapor Intrusion Study Work Plan and preparation of an RFI Addendum, if appropriate
- Completion of an investigation work plan for investigation of the M26/M27 chromium pit area, north area soil grid sampling, and surface soil chromium investigations
- Semi-annual groundwater monitoring in accordance with the recommendations made in the GMP and 2010 Annual Groundwater Monitoring Program Report
- Preparation and submittal of response to IDEM April 21, 2011 comments on the 2010 Annual Groundwater Monitoring Report
- Disposal of investigation derived waste

## 10.0 REPORTS AND DATA

A response to IDEM comments on the revised 2009 Annual Groundwater Monitoring Report was submitted to IDEM on January 6, 2011.

The 2010 Annual Groundwater Monitoring Report was submitted to IDEM on January 31, 2011. IDEM comments on the Report were received on April 21, 2011 via electronic mail.

The Quarterly Technical Progress Report, October 2010 through December 2010, was submitted to IDEM on February 1, 2011.

Preliminary vapor intrusion data (i.e., groundwater grab sample data) were submitted to IDEM by email on February 14, 2011.