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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**GENERAL MOTORS CORPORATION
NORTH AMERICAN TRUCK PLATFORMS
INDIANAPOLIS, INDIANA
(FORMERLY ULRICH CHEMICAL, INC.
IND 006 044 333)**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
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EXECUTIVE SUMMARY

~~ENFORCEMENT
CONFIDENTIAL~~

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the General Motors Corporation North American Truck Platforms (GMC) facility (formerly known as Ulrich Chemical, Inc.) in Indianapolis, Marion County, Indiana. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

Operations at the GMC facility consist of the repair and storage of metal transfer racks. The facility is also used as office space and has, in the past, been used as a location to conduct personnel training programs and various negotiations. In October 1986, following the removal of various underground storage tanks (UST), soil contaminated with lead and volatile fuels was discovered and subsequently removed from the facility. During operations of Ulrich Chemical, Inc. (Ulrich), the following waste streams were managed on site: spent solvents (F001, F002, F003, and F005); waste acetone (F003); and waste trichloroethylene (F001). The facility generated waste rinse water (nonhazardous) from the process of rinsing out reusable polyethylene acid drums prior to refilling them with product from bulk storage. All of the above-mentioned wastes are no longer managed by the facility as closure of the Ulrich facility was approved by the Indiana Department of Environmental Management (IDEM) in December 1984.

The facility is located at 398 Division Street in Indianapolis, Marion County, Indiana. GMC has operated at this location since June 1982. The facility occupies 2.1 acres in an industrial and residential mixed-use area and employs about 5 to 10 people. The facility's current regulatory status is that of a non-handler of hazardous waste. In the past, the facility was regulated as a generator and transportation, storage, or disposal (TSD) facility when owned and operated by Ulrich Chemical, Inc. (Ulrich). Closure of the former Ulrich facility, which contained one regulated unit, the Former Hazardous Waste Drum Storage Area (SWMU 1), was approved by IDEM in December 1984. After the removal of product diesel fuel, gasoline, and 1,1,1-trichloroethane (TCA) USTs in October 1986, soil contaminated with lead and volatile fuels was discovered and subsequently removed from the

facility. Documents indicating the certification of tank removal and approval of remedial activities were not included in IDEM or EPA files nor were such documents available from facility representatives. Prior ownership history of the facility, according to GMC representatives, dates back to 1929, when the facility was built as a steel warehouse for Truscon Steel. Ulrich acquired the facility in 1961 from Republic Steel Corporation. Additional details and information regarding past ownership and operational history were not included in IDEM or EPA files.

The PA/VSI identified the following two SWMUs and two AOCs at the GMC facility:

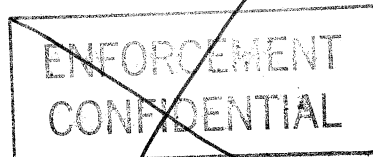
Solid Waste Management Units

1. Former Hazardous Waste Drum Storage Area
2. Former Neutralization Tank

Areas of Concern

1. Former Fuel USTs Area
2. Former TCA UST Area

In December 1984, IDEM approved closure of the Former Hazardous Waste Drum Storage Area (SWMU 1). Details regarding the Former Neutralization Tank (SWMU 2), which no longer exists on-site, were not included in IDEM or EPA files. In October 1986, three USTs were removed from the west side of the facility and another was removed from the northeast side. After removal, excavated soil from both areas was sampled and analyzed. Results indicated that soil had been contaminated with lead and volatile fuels. Approximately 250 cubic yards of soil were excavated and disposed of off site. However, certification of tank removal and approval of remediation activities were not available nor were these documents included in IDEM or EPA files. The two areas where USTs were removed and soil contamination was found represent AOCs 1 and 2. Past potential for release to groundwater, surface water, air, and on-site soils from SWMUs 1 and 2 is unknown due to the lack of information pertaining to these units. Because these units no longer manage waste, there is no current potential for releases to environmental media from SWMUs 1 and 2. The potential for release from AOCs 1 and 2 to groundwater, which is encountered at about 30 feet below grade in the area, is moderate due to the proximity of the contamination to groundwater. Documentation regarding post-excavation sampling was not available nor was it included in IDEM or EPA files. The



nearest surface water body to the facility, White River, lies 0.5 mile to the east; therefore, the potential for release to surface water is low. During the excavation of AOCs 1 and 2, a release of TCA and fuel vapors to air likely occurred. The current potential for release to air from these areas is low due to the nonvolatile nature of lead and because the excavated areas (AOCs 1 and 2) were backfilled.

The GMC facility is situated in an industrial and residential mixed-use area of Indianapolis, Marion County, Indiana. Indianapolis has an approximate population of 740,000 people. The facility is bordered on the north by Conrail Railroad and by residential areas on the south. Industrial facilities lie to the west of GMC and the White River is situated on the facility's east side. There is a palustrine, unconsolidated bottom, intermittently exposed, excavated wetland of approximately 3 acres in size located approximately 0.5 mile west of the facility. Several other wetlands of varying classifications are located within 3 miles of the facility. The nearest school to GMC is Public School #47, which is approximately 0.5 mile southeast of the facility. Access to the facility is controlled by patrolling security guards and GMC is presently installing an alarm detection system.

Groundwater is used as a municipal and industrial water supply in the area. The location of the nearest drinking water well could not be determined from a review of IDEM or EPA files. GMC has an industrial well, approximately 90 feet deep, located at its facility.

RAI recommends that EPA determine whether remedial activities for AOCs 1 and 2 were performed properly and adequately by GMC. If so, RAI recommends that EPA request and obtain documentation indicating tank removal certification and approval regarding remediation. If remediation is found to have been inadequate, RAI suggests that both areas be remediated according to an approved remediation plan. RAI recommends no further action for SWMUs 1 and 2.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the General Motors Corporation North American Truck Platforms (GMC) facility (formerly known as Ulrich Chemical, Inc.) in Indianapolis, Indiana.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the GMC facility in Indianapolis, Marion County, Indiana (EPA Identification No. IND 006 044 333). The PA was completed on June 1, 1993. RAI gathered and reviewed information from the Indiana Department of Environmental Management (IDEM) and from EPA Region 5 RCRA files. RAI also reviewed relevant publications from the National Oceanic and Atmospheric Administration (NOAA), U.S. Department of Agriculture (USDA), U.S. Department of Commerce (USDC), U.S. Geological Survey (USGS), U.S. Department of the Interior (USDI), and the Federal Emergency Management Agency (FEMA). The VSI was conducted on June 2, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. RAI identified two SWMUs and two AOCs at the GMC facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and four inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

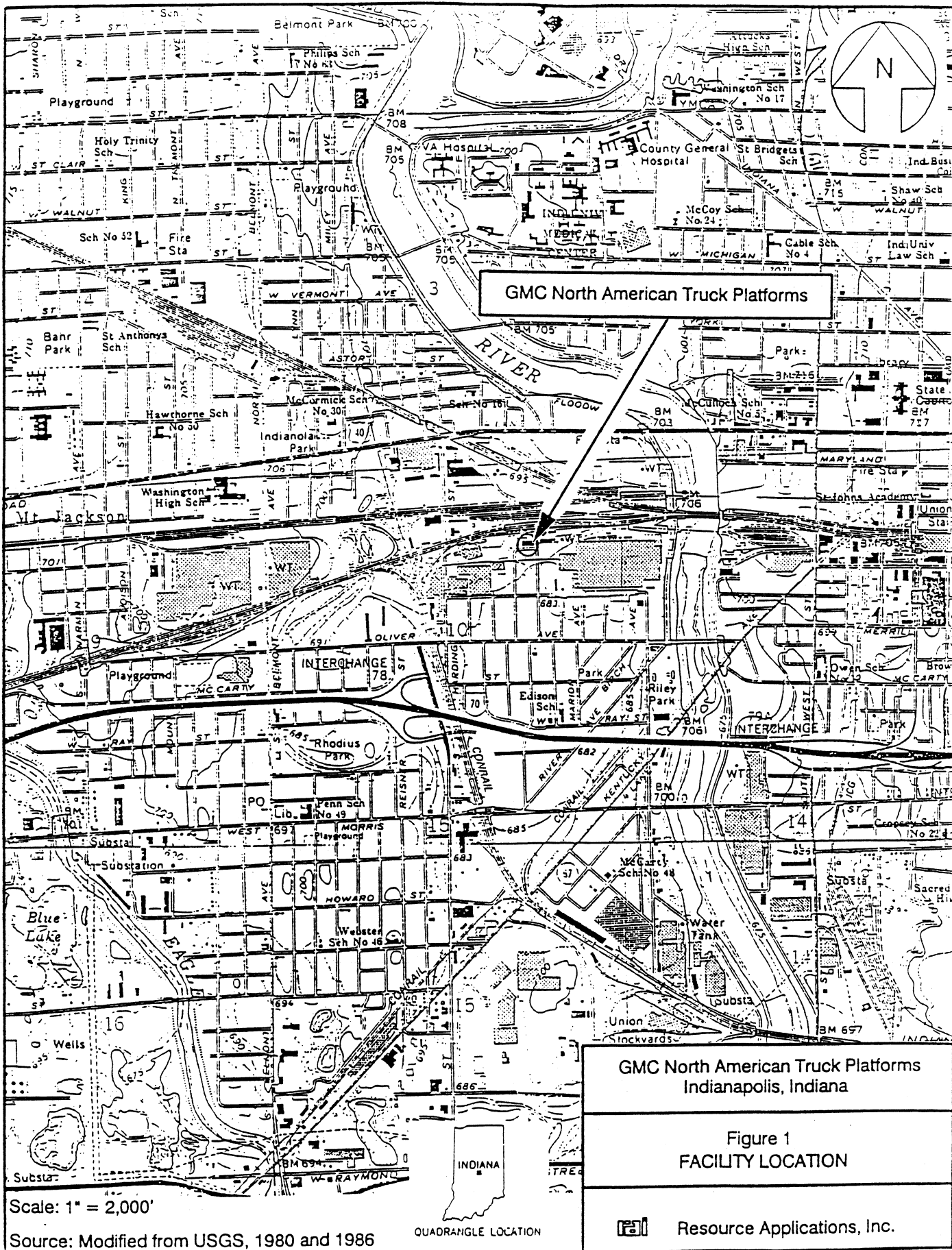
2.1 FACILITY LOCATION

The GMC facility is located at 398 Division Street in Indianapolis, Marion County, Indiana. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 39°45'45" N and longitude 86°10'57" W) (USGS, 1980). The facility occupies 2.1 acres in an industrial and residential mixed-use area.

The facility is bordered on the north by Conrail Railroad and by residential areas on the south. Industrial facilities lie to the west of GMC and the White River is situated on the facility's east side.

2.2 FACILITY OPERATIONS

Operations at the GMC facility currently include the repair and storage of metal transfer racks. Repairing such racks involves cutting and welding scrap metal, which is then transferred for use to the company's main plant for use in sheet metal operations (GMC's main plant is located across Division Street, immediately west of the subject facility). The facility is also used as office space. Since acquiring the facility from Ulrich Chemical, Inc. (Ulrich) in 1982, GMC has also used the facility as a location for holding miscellaneous negotiations with construction managers and as an area for training forklift drivers. GMC generates waste scrap metal from its operations. During the period when Ulrich occupied the facility, operations consisted of storing and transporting virgin chemical products and spent chemicals. Ulrich served as a distributor of product chemicals and also received containerized or drummed waste chemicals for storage and transportation to commercial hazardous waste treatment or disposal facilities. Solid wastes generated from operations of Ulrich and the SWMUs where they were managed are discussed in detail in Section 2.3.



Raw materials used at the GMC facility consist of various gases which are used in the process of welding and repairing metal racks. Among the gases used are oxygen and a blend containing inert argon and an allene hydrocarbon mixture. These gases are contained in pressurized cylinders. When empty, the tanks are reclaimed and refilled by AGA Gas of Indianapolis, Indiana. Raw materials stored by Ulrich included 1,1,1-trichloroethane (TCA), regular and unleaded gasoline, and diesel fuel. TCA was stored in a 10,000-gallon underground storage tank (UST) located on the northeast side of the facility, while diesel fuel and gasoline were stored in one 6,000-gallon and two 10,000-gallon USTs on the west side of the facility. Additional information pertaining to these materials was not included in IDEM or EPA files.

Ulrich also had an aboveground neutralization tank on site. Ulrich used this tank for neutralizing waste rinse waters that were generated from rinsing reusable polyethylene acid containers (prior to refilling them from bulk storage). The neutralization tank was exempt from permitting requirements due to an amendment in applicable RCRA regulations (ISBH, 1981). Details and information pertaining to the method of neutralization, the location of rinsing polyethylene containers, and how this waste rinse water reached the tank, were not included in IDEM or EPA files. GMC facility representatives had no knowledge of Ulrich operations.

GMC had four USTs (used and owned by Ulrich, as mentioned above) removed by Petrochem Services, Inc. (Petrochem) of Indianapolis, Indiana, in October 1986 (GMC, 1986b). The USTs had been out of operation since June 1982 (GMC, 1986a). Subsequent disposal of the tanks and their contents was performed by Indiana Liquid Waste Disposal, Inc. (ILWD) of Indianapolis, Indiana, a sister company of Petrochem. Petrochem transported the liquid contents of the tanks to Heritage Environmental Services of Indianapolis, Indiana. The material was transported under the generator EPA Identification Number of GMC's main plant in Indianapolis (IND 079 583 720). Details regarding the ultimate disposition of the tanks were not available nor were they included in EPA or IDEM files. Soil sampling of the areas that housed the USTs was completed by Process Engineering Group (PEG), also a sister company of Petrochem, and samples were sent for analyses to Alt & Witzig Engineering, Inc. (AWEI) of Indianapolis, Indiana. Results of the analyses revealed that the surrounding soils on the west and northeast sides of the facility had been contaminated with lead and volatile fuels, respectively (AWEI, 1986). Concentrations of lead as high as 68 parts per million (ppm) and volatile fuels at 6,500 ppm were present in soil samples taken from the two areas.

Petrochem excavated, removed, and transported a total of approximately 250 cubic yards of contaminated soil from the UST areas, taking the material to Chemical Waste Management, Inc. in Fort Wayne, Indiana (Petrochem, 1986). The material was transported under the generator EPA Identification Number of GMC's main plant in Indianapolis (IND 079 583 720). Neither a certification of tank removal nor an IDEM or EPA approval of remedial activities for the Former Fuel USTs Area (AOC 1) and Former TCA UST Area (AOC 2) were included in state or federal files. During an interview and after subsequent phone conversations with GMC representatives, documents indicating tank removal certification and approval of remedial activities were not available (GMC, 1993).

The facility is situated on approximately 2.1 acres of land and is comprised of a warehouse area (36,000 square feet) and office space (4,000 square feet). The facility initially operated under the name GMC Truck and Bus Group. However, as indicated by facility representatives, a name change to GMC North American Truck Platforms was made in early 1993 due to the sole involvement with truck and sheet metal operations by GMC's main plant. The GMC facility is presently installing an alarm detection system.

According to GMC representatives, Ulrich acquired the facility in 1961 from Republic Steel Corporation. The facility was originally built as a steel warehouse for Truscon Steel in 1929. Additional information regarding past operations and former land use was not included within IDEM or EPA files nor was it available during interviews with GMC facility representatives.

2.3 WASTE GENERATION AND MANAGEMENT

The lone solid waste currently generated from operations (metal rack repair and storage) at the GMC facility is waste scrap metal. Soil contaminated with lead and volatile fuels (D001, D008) was "generated" from the removal of USTs (AOCs 1 and 2) in October 1986.

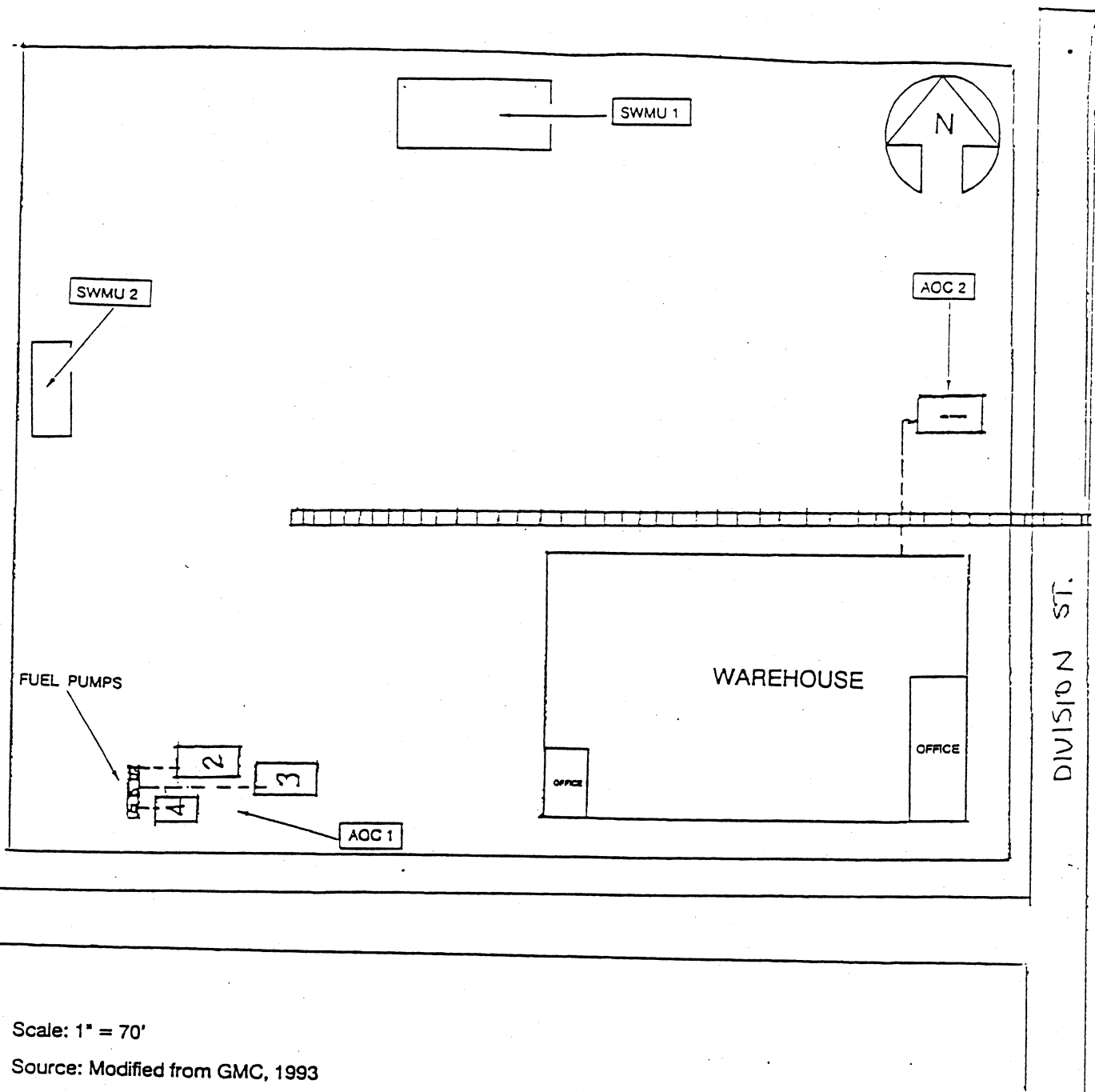
During the period when facility operations were controlled by Ulrich, various hazardous wastes were handled and generated on site. SWMUs formerly used by Ulrich, and their current status, are identified in Table 1. The former locations of these SWMUs in relation to the facility layout are shown in Figure 2. Past wastes generated at the facility are summarized in Table 2.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Former Hazardous Waste Drum Storage Area	Yes	Inactive; RCRA closure approved in December 1984
2	Former Neutralization Tank	No	Inactive

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B Permit application.



Scale: 1" = 70'

Source: Modified from GMC, 1993

Solid Waste Management Units (SWMU)

1. Former Hazardous Waste Drum Storage Area
2. Former Neutralization Tank

Areas of Concern

1. Former Fuel UST's Area
2. Former TCA UST Area

GMC North American Truck Platforms
Indianapolis, Indiana

Figure 2
FACILITY LAYOUT



Resource Applications, Inc.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^b</u>
Waste Scrap Metal/NA	Welding and repair of metal racks	None
Soil Contaminated With Lead and Volatile Fuels/D001, D008	Removal of former fuel and TCA USTs	None
Spent Solvents/F001, F002, F003, F005	Various off-site facilities	1
Waste Acetone/F003	Various off-site facilities	1
Waste Trichloroethylene/F001, F002	Various off-site facilities	1
Waste Rinse Water/NA	On-site rinsing of reusable polyethylene acid containers by Ulrich	2

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b "None" indicates that the waste is not managed on site.

SWMUs formerly used by Ulrich are discussed in detail in Section 3.0. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

Waste scrap metal is generated from the process of welding and repairing metal racks. This waste is not managed onsite, but rather is taken immediately to GMC's main plant. From the main plant, Kasle Recycling Metallic Resources Corporation of Indianapolis, Indiana, claims the scrap metal for recycling. No rate of generation was available for waste scrap metal.

Soil contaminated with lead and volatile fuels (D001, D008) was "generated" from the one-time removal of USTs in October 1986. Soil contaminated with lead and volatile fuels was excavated from the west side of the facility and transported directly to Chemical Waste Management, Inc. (CWM) in Fort Wayne, Indiana, for disposal (method of disposal not specified). Soil on the northeast portion of the facility, contaminated with volatile fuels, was also transported directly to CWM for disposal.

Ulrich operated as a treatment, storage, or disposal (TSD) facility, accepting virgin chemicals and spent solvents from off-site locations, storing the waste in drums, and then transporting the waste to off-site reclamation and treatment facilities. As indicated by the facility's RCRA Part A Permit application, Ulrich accepted and handled virgin corrosive chemicals, industrial water treatment chemicals, and spent solvents (F001, F002, F003, and F005 wastes). Specific solvents were not identified on the RCRA Part A Permit application. Spent solvents, which were accepted from various off-site facilities (unspecified), were kept in drums and stored for less than 90 days on a concrete floor in the Former Hazardous Waste Drum Storage Area (SWMU 1). From SWMU 1, the drummed wastes were transported offsite to various unspecified reclamation and treatment facilities. Additional information and descriptions regarding virgin product chemicals were not included in IDEM or EPA files.

An Indiana Stream Pollution Control Board Liquid Waste Removal Record of 1981 indicated that Hydrite Chemical Company, of Cottage Grove, Wisconsin, transported Waste Acetone (F003) and Waste Trichloroethylene (F001, F002) from the Ulrich facility (Ulrich, 1981b). These wastes, which were stored in SWMU 1, originated from various off-site locations. Additional information regarding this waste was not available nor was it included in IDEM or EPA files.

Ulrich generated nonhazardous waste rinse water from the process of rinsing out reusable polyethylene acid containers on site. The facility rinsed the containers prior to refilling them with virgin chemicals from bulk storage. The resulting waste rinse water was neutralized in the Former Neutralization Tank (SWMU 2) and then discharged to the municipal sewer.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility.

As part of operations by Ulrich, four USTs held product chemicals, including regular and unleaded gasoline, diesel fuel, and TCA. The gasoline and diesel fuel USTs were located outdoors on the west side of the facility, while the UST containing product TCA was located outdoors on the northeast side of the facility. In October 1986, GMC contracted with Petrochem to have the USTs removed. After removal of the USTs, PEG sampled the excavated soil and results of the sample analyses, performed by AWEI, indicated that on-site soils in the areas of the Former Fuel USTs Area (AOC 1) had been contaminated with lead and volatile fuels and the Former TCA UST Area (AOC 2) had been contaminated with volatile fuels. Concentrations as high as 68 ppm and 6,500 ppm were detected for lead and volatile fuels, respectively. Information and details regarding the cause of such contamination were not available nor were they included in IDEM or EPA files. Petrochem excavated, removed, and transported approximately 250 cubic yards of lead- and volatile fuel-contaminated soil, taking it to Chemical Waste Management, Inc. in Fort Wayne, Indiana. The material was transported under the generator EPA Identification Number of GMC's main plant (IND 079 583 720). Documents indicating certification of tank removal and approval of remedial activities were not available, nor were such documents included in IDEM or EPA files.

2.5 REGULATORY HISTORY

GMC does not generate hazardous waste from facility operations. Consequently, GMC never submitted a Notification of Hazardous Waste Activity form or RCRA Part A Permit application (for the subject facility) to EPA. Ulrich submitted a Notification of Hazardous Waste Activity form to EPA on August 14, 1980, designating itself as a hazardous waste generator and TSD facility (Ulrich,

1980a). The form did not contain EPA hazardous waste codes for wastes handled on site. On November 18, 1980, Ulrich submitted a RCRA Part A Permit application to EPA, listing F001, F002, F003, and F005 wastes and process code S01, with a design capacity of 3,300 gallons (Ulrich, 1980b). The application also listed process code T02, referring to the Former Neutralization Tank (SWMU 2). This unit was later found to be exempt from RCRA permitting requirements due to the amendment in RCRA treatment regulations.

Closure activities for Ulrich's S01 unit, referring to the Former Hazardous Waste Drum Storage Area (SWMU 1), began when the facility submitted a closure plan to IDEM on July 18, 1983 (Ulrich, 1983). On September 25, 1984, IDEM approved the facility's closure plan, which entailed the physical removal of all hazardous waste containers for treatment or disposal by commercial off-site hazardous waste management facilities (IDEM, 1984a). On November 14, 1984, Ulrich submitted certification of closure for the facility. At this time, Ulrich also indicated that the property had been sold to GMC and that Ulrich no longer had access to or control of the subject property (Ulrich, 1984). In a December 27, 1984, letter to Ulrich, IDEM indicated that closure had been completed as required by 40 CFR 265.110 through 265.115 and 320 IAC 4-7-1 (IDEM, 1984b). GMC currently operates the facility as a non-handler of hazardous waste.

Various inspections have occurred at the facility during operations by both Ulrich and GMC. On September 22, 1981, EPA and the Indiana State Board of Health (ISBH) conducted a RCRA Interim Status Standards inspection of the Ulrich facility (ISBH, 1981a). During the inspection, the facility's contingency plan was found to be deficient and violations relating to hazardous waste management paperwork were cited. Ulrich responded to the deficiencies and violations on November 13, 1981, and based upon review by ISBH, Ulrich had achieved compliance with interim status standards (Ulrich, 1981a; ISBH, 1981b).

On August 27, 1984, the ISBH Division of Land Pollution Control performed a closure inspection of the former Ulrich facility. In an ISBH memorandum regarding the closure inspection, an ISBH representative indicated that "everything was in order with no evidence of any drums or spills" at the facility (ISBH, 1984). An ISBH representative indicated that ISBH would request owner certification to completely close the facility (Ulrich submitted certification of closure on November 14, 1984, and IDEM subsequently approved closure on December 27, 1984).

On April 24, 1986, IDEM conducted a post-closure inspection of the former Ulrich facility (IDEM, 1986). The inspection revealed that no hazardous waste activities were occurring at the facility. The inspection report indicated that GMC now used the facility to store metal transfer racks, to conduct training of fork lift drivers, and as office space. IDEM indicated that no further action was required for the facility.

Based on review of IDEM and EPA files and interviews with facility representatives, the GMC facility is not required to have air permits. There is no history of odor complaints from area residents.

According to GMC representatives, the facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. Sanitary wastewaters from the facility discharge to the sanitary sewer, ultimately leading to the Belmont Publicly Owned Treatment Works. Additional information regarding water discharges was not available, nor was it included in IDEM or EPA files. Information on water discharges during operations by Ulrich was not included in IDEM or EPA files.

The facility, when occupied by Ulrich, had four USTs located onsite. The USTs contained regular and unleaded gasoline, diesel fuel, and product TCA, and were removed by Petrochem (contractor to GMC) in October 1986. It was estimated, on a Description of Underground Storage Tanks form, that each of the tanks was last used in June 1982 (GMC, 1986a). After removal of the USTs, soil sampling was performed in the areas of the USTs and resulting analyses indicated that on-site soils on the west and northeast sides of the facility had been contaminated with lead and volatile fuels. Details regarding contamination of this area are discussed in Sections 2.4 and 4.0 of this report. Certification of removal and approval of cleanup activities were not available nor were such documents included in IDEM or EPA files.

There has been no CERCLA (Superfund) activity performed at the GMC facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The GMC facility is located in Marion County, which is on the fringe of the climatic influence of the Great Lakes. Marion County has a typically continental humid climate, with warm summers and cool winters. Weather changes over a period of a few days are induced by the alternate passage of cool polar air masses from the northwest and warm tropical air masses from the southwest. These changes are more frequent in winter and spring than in fall or summer, and tend toward short-period fluctuations in temperature, humidity, and precipitation (USDA, 1978; Ruffner, 1978). The average annual monthly temperature is 52.3 degrees Fahrenheit (°F). The highest average daily temperature is 85.4 °F in July and the lowest average daily temperature is 19.7°F in January. Average annual precipitation is 38.74 inches (Ruffner, 1978), and average net annual precipitation is 5.74 inches (USDC, 1968). Average annual snowfall is 20 inches. Precipitation is evenly distributed throughout the year, with slightly more falling in the spring and early summer (USDA, 1978). The 1-year, 24-hour maximum rainfall recorded in the area over a 29-year period is 4.18 inches (Ruffner, 1978).

The prevailing winds are from the southwest, although during some winter months, winds from the northwest dominate. The mean annual wind speed is 9.7 miles per hour. Average wind speed is highest in March at 11.7 miles per hour from the west-northwest (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The GMC facility is located in a Zone C flood plain area, indicating that it lies in an area of minimal flooding outside the 500-year flood plains (FEMA, 1988).

Surface water runoff from the facility flows easterly toward Division Street and drains to the municipal sewer. From the municipal sewer, surface water ultimately goes to the Belmont Publicly Owned Treatment Works.

2.6.3 Geology and Soils

Site-specific information regarding soils and geology is not available, therefore, regional information is presented here.

The area is underlain by soils of the Urban land - Genesee complex. The Urban land component consists of areas in which extensive development has obscured the original nature of the soils and extensive filling and cutting have occurred. The Genesee series is identifiable in lawns, gardens, parks, and other open areas, and consists of well drained soils formed in loamy alluvium. The surface layer is a dark grayish brown silt loam, approximately 6 inches thick. Beneath the surface layer lies a dark grayish brown firm silt loam to a depth of approximately 23 inches followed by a brown friable loam to a depth of approximately 32 inches. The underlying material consists of a very friable brown sandy loam to a depth of approximately 34 inches and a brown stratified silt loam and heavy silt loam to a depth of 60 inches. Permeability is moderate, available water capacity is high, and organic-matter content is high (USDA, 1978).

The entire land surface of Marion County consists of unconsolidated glacial deposits, or drift, of Pleistocene (Wisconsinan) age, as well as alluvium derived from the subsequent erosion of glacial materials by water. In the vicinity of the GMC facility, the surficial geology consists of outwash silts, sands and gravels, the result of erosion of bedrock by ice and water, and subsequent meltwater stream deposition. To the east and west of the facility, in the vicinities of White River and Eagle Creek, surface deposits consist of alluvial sands, silts, and clays; the result of recent stream erosion and deposition (Harrison, 1963). The outwash deposits beneath the facility contain lenses of glacial till deposits consisting of silt and clay (Hartke, et al, 1980). The thickness of drift deposits in the vicinity of the facility is approximately 125 feet (Harrison, 1963).

The drift deposits lie unconformably on Devonian bedrock. Bedrock units in the Indianapolis area dip gently to the west, and this has led to the complete erosion of the Upper Devonian New Albany Shale below the facility. This deep brown to black pyritiferous shale occurs as the uppermost bedrock unit a short distance to the west. The uppermost bedrock unit beneath the facility is the Middle Devonian Jeffersonville Limestone. Beneath this are a series of Silurian limestones and dolomites, with intermittent calcareous shales. The Silurian and Devonian rocks have an inferred thickness of approximately 400 feet, and are underlain by Ordovician shales of the Richmond Group.

2.6.4 Groundwater

The majority of the water supply for the City of Indianapolis is obtained from surface water; Eagle Creek Reservoir is fed by Eagle Creek; Morse Reservoir is fed by the White River in Hamilton County, to the north; and Geist Reservoir is fed by Fall Creek in northeastern Marion County (Hartke et al., 1980). About 8 percent, or 7.2 million gallons per day (mgd), of the Indianapolis Water Company supply is obtained from groundwater wells.

The primary groundwater sources are the unconsolidated drift materials covering the county, primarily sand and gravel deposits. Sand and gravel wells in the vicinity of the GMC facility may yield in excess of 500 gallons per minute (gpm) (Herring, 1974). The aquifer in the vicinity of the facility is divided into two units separated by a clay (till) lens approximately 20 feet thick. Information on the exact depth of the lens was not available. The facility well taps the lower sand and gravel aquifer, down to a depth of approximately 90 to 100 feet.

The most productive bedrock aquifer system, located at a depth of approximately 100 feet, is that of the Silurian-Devonian limestone and dolomite formations. These units behave hydraulically as a single aquifer, and the most productive zone is in the upper 100 feet, where the greatest amount of solution development has occurred (Hartke, et al., 1980). In the vicinity of the facility, yields of 75 to 250 gpm may be obtained from bedrock wells in limestone (Herring, 1974). Groundwater in the vicinity of the facility is encountered at a depth of 30 to 40 feet in the sand and gravel aquifer (IDNR, 1993).

2.7 RECEPTORS

The GMC facility occupies 2.1 acres in an industrial and residential mixed-use area in Indianapolis, Indiana. Indianapolis has an approximate population of 740,000 people.

The facility is bordered on the north by Conrail Railroad and by residential areas on the south. Industrial facilities lie to the west of GMC and the White River is situated on the facility's east side. The nearest school, Public School #47, a junior high school, is located approximately 0.5 mile

southeast of the facility. Facility access is controlled by patrolling security guards. GMC is presently installing an alarm detection system.

The nearest surface water body, White River, is located about 0.5 mile north and east of the facility. The river is used as municipal and industrial water supply and for recreational purposes. Eagle Creek is located approximately 1 mile west of the facility and Fall Creek is located 1 mile northeast of the facility.

Groundwater is used as a municipal and industrial water supply in the area. The location of the nearest drinking water well could not be determined after a review of IDEM and EPA files or the interview with GMC representatives. GMC has an industrial well, approximately 90 feet deep, located at its facility.

The White River, located approximately 0.5 mile to the north and east of the facility, is classified as a lacustrine, limnetic, unconsolidated bottom, permanently flooded, diked wetland. A palustrine, unconsolidated bottom, intermittently exposed, excavated wetland of approximately 3 acres in size is located approximately 0.5 mile west of the facility. Several other wetlands of varying classifications are located within 3 miles of the facility. No state or national parks are located within 2 miles of the facility. There are no other sensitive environments within 2 miles of the facility (USDI, 1981).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Hazardous Waste Drum Storage Area

Unit Description:

The Former Hazardous Waste Drum Storage Area is an outdoor area located on the north side of the facility, formerly used by Ulrich for storing drummed hazardous wastes for less than 90 days. The unit consisted of a metal shed and a concrete floor. There was no information in EPA or IDEM files indicating whether or not the unit had berms, dikes, or floor drains associated with it. Dimensions of this unit were not identified, though from Ulrich's RCRA Part A Permit application, the design capacity of the unit was 3,300 gallons (60 55-gallon drums). Additional information regarding this unit was not available nor was it included in IDEM or EPA files.

Date of Startup:

The exact date on which this unit began operations is unknown. This unit was listed on the facility's November 18, 1980, RCRA Part A Permit application, and documents in IDEM and EPA files indicate that the unit was used as recently as June 1982.

Date of Closure:

This unit was RCRA closed in December 1984.

Wastes Managed:

This unit managed the following wastes: spent solvents (F001, F002, F003, and F005); waste acetone (F003); and waste trichloroethylene (F001, F002). These wastes were managed in 55-gallon drums and kept on a concrete floor. From SWMU 1, the drummed wastes were shipped to unspecified off-site disposal and treatment facilities.

Release Controls: No information was available regarding possible release controls associated with this unit.

History of Documented Releases: There have been no documented releases from this unit.

Observations: At the time of the VSI, the location of the Former Hazardous Waste Drum Storage Area was viewed. Metal racks were being stored on the ground (gravel and dirt) in this area (See Photograph No. 2). Information regarding soil sampling and removal of the concrete pad in this area was not available from facility representatives, nor was it included in IDEM or EPA files.

SWMU 2 Former Neutralization Tank

Unit Description: The Former Neutralization Tank was located outdoors on the northwest side of the facility. Additional information and details regarding this unit, including the material of its construction and any secondary containment devices, were not available from facility representatives, nor were they included in IDEM or EPA files. On Ulrich's RCRA Part A Permit application (it was listed as a protective filing measure), the unit was listed as having a capability of treating 200,000 gallons per day.

Date of Startup: The date when this unit went into operation was not included in IDEM or EPA files.

Date of Closure: This unit no longer exists on site. Due to an amendment in RCRA treatment regulations, this unit was exempt from permitting requirements. No other information was provided regarding this unit.

Wastes Managed: This unit managed nonhazardous waste rinse water, generated from Ulrich's process of rinsing out reusable polyethylene acid containers prior to refilling them with product from bulk storage. The waste rinse water was managed and treated in the tank prior to discharge to the municipal sewer.

Release Controls: No information was available regarding possible release controls associated with this unit.

History of Documented Releases: There were no documented releases from this unit.

Observations: During the VSI, RAI observed the area of the Former Neutralization Tank. Metal racks are kept in the area (See Photograph No. 3). Information on removal of this unit and any subsequent sampling performed in the area was not available, nor was such information included in IDEM or EPA files.

4.0 AREAS OF CONCERN

RAI identified two AOCs during the PA/VSII. These AOCs are discussed below; their locations are shown in Figure 2.

AOC 1

Former Fuel USTs Area

This area is the location of three former steel USTs used for holding leaded and unleaded gasoline and diesel fuel. The USTs, which had storage capacities of 6,000 and 10,000 gallons, were situated 4 to 8 feet below grade. After the removal of gasoline and diesel fuel USTs in October 1986, the surrounding soil on the west side of the facility was found to be contaminated with lead and volatile fuels (concentrations as high as 68 ppm were found for lead). Petrochem excavated an "area approximately twice the size of the area occupied by the tanks" and removed approximately 250 cubic yards of contaminated soil from the area. The area (see Photograph No. 4) is an AOC because a certification of tank removal and approval of remedial activities were not available, nor were such documents found within IDEM or EPA files. Requirements for providing IDEM with certification of tank removal became effective in January 1986.

AOC 2

Former TCA UST Area

This area is the location of a former 10,000-gallon, steel TCA UST. Located on the northeast side of the facility, the UST was removed in October 1986. The UST was situated approximately 4 feet below grade. After its removal (an area "approximately twice the area occupied by the tank" was excavated), surrounding soil on the northeast side of the facility was found to be contaminated with volatile fuels (concentrations as high as 6,580 ppm). Contaminated soil (the amount was not specified) was removed from the area and

taken to Chemical Waste Management in Fort Wayne, Indiana. The area (See Photograph No. 1) is an AOC because a certification of tank removal and approval of remedial activities were not available, nor were such documents found within IDEM or EPA files. Requirements for providing IDEM with certification of tank removal became effective in January 1986.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and two AOCs at the GMC facility in Indianapolis. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and each AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

SWMU 1 Former Hazardous Waste Drum Storage Area

Conclusions: This unit, which was located outdoors on the north side of the facility, stored drummed spent solvents (F001, F002, F003, and F005). Steel and polyethylene 55-gallon drums of waste were situated upon a concrete floor. Wastes were stored in closed drums. Additional information regarding this unit was not available nor was it included in IDEM or EPA files. Due to the lack of information pertaining to this unit, the past potential for release to groundwater, surface water, air, and on-site soils is unknown. However, IDEM approved closure of this unit in December 1984. Any releases from this unit should have been properly remediated prior to the IDEM-approved closure of the unit. This unit no longer manages hazardous wastes. Consequently, there is no current potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: RAI recommends no further action for this unit at this time.

SWMU 2 Former Neutralization Tank

Conclusions: This unit was located on the northwest side of the facility and managed nonhazardous waste corrosive rinse waters, discharging them to the municipal

sewer. The unit had the capability of treating 200,000 gallons of wastewater per day. Additional information regarding this unit was not included in IDEM or EPA files, nor was it provided by facility representatives. Due to the lack of information pertaining to this unit, the past potential for release to groundwater, surface water, air, and on-site soils is unknown. The unit no longer exists on site. Consequently, there is no current potential for release to groundwater, surface water, air, and on-site soils.

Recommendations: RAI recommends no further action for this unit.

AOC 1 Former Fuel USTs Area

Conclusions: Soil contaminated with lead and volatile fuels (D001, D008) was discovered after the removal of fuel USTs on the west side of the facility in October 1986. Approximately 250 cubic yards of contaminated soil were removed from the area and disposed of. Certification of tank removal and approval of remedial activities were not available nor were they included in IDEM or EPA files. The potential for release to groundwater in this area is moderate since groundwater in the area is first encountered at a depth of about 30 feet below grade and the depth of USTs was approximately 4 to 8 feet (documentation regarding post-excavation sampling was not available nor was it included in IDEM or EPA files). The potential for release to surface water from this area is low, since the nearest surface water body, White River, lies 0.5 mile to the east of the facility. The potential for release to air from this area is low due to the physical and chemical properties of lead and also because the excavated area was backfilled.

Recommendations: RAI recommends that EPA determine whether remedial activities regarding the former fuel USTs were performed adequately by GMC (i.e., post-excavation sampling to ensure that the area is clean). If so, RAI suggests that EPA obtain documents of certification and approval relating to this matter. If

not, RAI suggests that the area be remediated properly and adequately according to an approved remediation plan.

AOC 2

Former TCA UST Area

Conclusions:

The former TCA UST was removed in October 1986. On-site soil in the area was discovered to be contaminated with volatile fuels. The soil was excavated and removed from the area. Proper certification of tank removal, approval of remedial activities for this area, and documents of tank removal certification and verification that the area was free of contamination were not available nor were such documents included in IDEM or EPA files. The potential for release to groundwater in this area is moderate since groundwater in the area is located approximately 30 feet below grade, while the depth of the TCA UST was 4 to 8 feet (documentation regarding post-excavation sampling was not available nor was it included in IDEM or EPA files). The nearest surface water body, White River, lies 0.5 mile east of the facility. The potential for release to surface water from this area is low. A release to air from this area likely occurred during excavation due to volatility of TCA. The potential for release to air from this area is low because the excavated area was backfilled.

Recommendations:

RAI recommends that EPA determine whether remedial activities regarding the former TCA UST were performed adequately by GMC (i.e., post excavation sampling to ensure that the area is clean). If so, RAI suggests that EPA obtain documents of certification and approval relating to this matter. If not, RAI suggests that the area be remediated properly and adequately according to an approved remediation plan.

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TABLE 3
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Hazardous Waste Drum Storage Area	Unknown; unit was RCRA closed in December 1984	None	No further action for this unit.
2. Former Neutralization Tank	Unknown	None	No further action for this unit.

<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former Fuel USTs Area	1968 to June 1982	Soil contaminated with lead and volatile fuels was discovered after removal of fuel USTs in October 1986.	RAI recommends that EPA obtain certification of tank removal and documentation indicating approval of remediation pertaining to this area or, if necessary, remediate according to an approved remediation plan.
2. Former TCA UST Area	1973 to June 1982	Soil contaminated with volatile fuels was discovered after removal of TCA UST in October 1986.	RAI recommends that EPA obtain certification of tank removal and documentation indicating approval of remediation pertaining to this area or, if necessary, remediate according to an approved remediation plan.

REFERENCES

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- General Motors Corporation North American Truck Platforms (GMC), 1986a. Notification of Underground Storage Tanks (USTs), April 21.
- GMC, 1986b. GMC interoffice memorandum indicating completion of UST removal project and request for a purchase order for the disposal of contaminated soil, December 8.
- GMC, 1993. Telephone conversation between GMC facility representative, Don Parrott, and John Wong, RAI, and subsequent correspondence regarding the removal of USTs faxed to RAI by GMC, June 22.
- Harrison, W., 1963. Geology of Marion County, Indiana. Indiana Department of Conservation Geological Survey Bulletin No. 28, Bloomington, Indiana.
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- National Oceanic and Atmospheric Administration (NOAA), 1990. Local Climatological Data: Indianapolis, Indiana. National Climatic Data Center, Asheville, North Carolina.
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- Ulrich Chemical, Inc. (Ulrich), 1980a. Notification of Hazardous Waste Activity, August 14.
- Ulrich, 1980b. RCRA Part A Permit Application, November 18.
- Ulrich, 1981a. Response to Notice of Deficiencies pertaining to September 22, 1981, RCRA inspection, November 13.
- Ulrich, 1981b. Liquid waste removal record, December 31.
- Ulrich, 1983. Closure plan, July 18.
- Ulrich, 1984. Certification of closure, November 14.
- United States Department of Agriculture (USDA), 1978. Soil Survey of Marion County, Indiana. U.S. Government Printing Office, Washington, D.C.
- United States Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Government Printing Office.
- United States Department of the Interior (USDI), 1981. National Wetlands Inventory for Indianapolis West and Maywood, Indiana Quadrangles.
- United States Geological Survey (USGS), 1980. 7.5-Minute Series Topographic Map for Indianapolis, Indiana, West Quadrangle, modified.
- USGS, 1986. 7.5-Minute Series Topographic Map for Maywood, Indiana Quadrangle, modified.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IN 02 SITE NUMBER IND 006 044 333

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
General Motors Corporation North American Truck Platforms
(formerly Ulrich Chemical, Inc.)

02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
398 Division Street

03 CITY
Indianapolis

04 STATE IN 05 ZIP CODE 46221 06 COUNTY Marion 07 COUNTY CODE 08 CONG DIST

09 COORDINATES: LATITUDE 39° 45' 45" N LONGITUDE 86° 10' 57" W

10 DIRECTIONS TO SITE (Starting from nearest public road)

I-65 south to West Street exit, turn right onto Washington Street, to Oliver Avenue, go west to Division Street, north on Division Street to facility, on left side.

III. RESPONSIBLE PARTIES

01 OWNER (if known)
General Motors Corporation North American Truck Platforms

02 STREET (Business, mailing residential)
340 White River Parkway, W. Dr. South, P.O. Box 388

03 CITY
Indianapolis

04 STATE IN 05 ZIP CODE 46206 06 TELEPHONE NUMBER (317) 269-5070

07 OPERATOR (if known and different from owner)
Same as owner

08 STREET (Business, mailing, residential)

09 CITY

10 STATE 11 ZIP CODE 12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

- ☒ A. PRIVATE ☐ B. FEDERAL: (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

- ☒ A. RCRA 3010 DATE RECEIVED: 11 / 18 / 80 MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

- ☒ YES DATE 06 / 02 / 93 ☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ NO ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: (Specify)

CONTRACTOR NAME(S): Resource Applications, Inc.

02 SITE STATUS (Check one)

- ☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1929 to present BEGINNING YEAR ENDING YEAR ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

No wastes are currently generated or present on-site. In the past, waste solvents (F001, F002, F003, and F005) were handled on site.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

In 1986, soil contaminated with lead and volatile fuels was discovered on the west and northeast portions of the facility. Lead concentrations as high as 68 ppm and volatile fuel concentrations as high as 6,500 ppm were present in soils in these areas.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

- ☒ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT

Kevin Pierard

02 OF (Agency/Organization)

EPA Region V

03 TELEPHONE

NUMBER (312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT

John Wong

05 AGENCY

06 ORGANIZATION
Resource Applications, Inc.

07 TELEPHONE NUMBER
(312) 332-2230

08 DATE

08 / 19 / 93
MONTH DAY YEAR



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE IN	02 SITE NUMBER IND 006 044 333
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II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

There is no current potential for groundwater contamination at this facility.

01 ☐ B. SURFACE WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no record of or current potential for surface water contamination at this facility.

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: 0 04 NARRATIVE DESCRIPTION

In the past, there was a potential for air contamination at this facility. During UST excavation and removal in October 1986, volatile fuel vapors may have escaped into the air. No current potential for release to air exists as the underground area was backfilled (see sections 2.4, 2.7, and 3.0 in the narrative).

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no record or current potential for fire/explosive conditions at this facility.

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no current potential for direct contact with contaminants at this facility.

01 ☐ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: 10/86) ☐ POTENTIAL ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: < 1 acre
(Acres) 04 NARRATIVE DESCRIPTION

There has been contamination of on-site soils at this facility. In 1986, soil contaminated with lead and volatile fuels was discovered on the west and northeast portions of the facility (see sections 2.4, 2.6.3, and 3.0 in the narrative). No record of cleanup certification or approval of remediation activities was available.

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no record of drinking water contamination at this facility.

01 ☐ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no record or current potential for worker exposure at this facility.

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

There is no prior documentation of, or current potential for, population exposure or injury at this facility.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE
IN

02 SITE NUMBER
IND 006 044 333

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

There are no documented incidents or current potential for damage to flora at this site.

01 ☐ K. DAMAGE TO FAUNA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

There are no documented incidents or current potential for damage to fauna at this site.

01 ☐ L. CONTAMINATION OF FOOD CHAIN

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

There are no documented incidents or current potential for damage to food chain at this site.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

There are no documented incidents for unstable containment of waste at this site.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

There is no current potential for damage to off-site property.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

There are no documented incidents or current potential for contamination of sewers, storm drains, or WWTP at this site.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

There are no documented or current incidents of illegal or unauthorized dumping at this site.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

There are no other known, potential, or alleged hazards at this site.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 740,000

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

Indiana Department of Environmental Management and EPA Region 5 RCRA files.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

General Motors Corporation
North American Trucks Platforms
398 Division Street
Indianapolis, Indiana 46206
IND 006 044 333

Date: June 2, 1993

Primary Facility Representative: Don Parrott, Sr. Manufacturing Engineer
Representative Telephone No.: (317) 269-5070, 8+339-5070
Additional Facility Representatives: Tony Vester, Ergonomics/Environmental; Robert Bowser, System Manager

Inspection Team: William Earle, Resource Applications, Inc. (RAI)
John Wong, RAI

Photographer: William Earle, RAI

Weather Conditions: Overcast, rainy; temperature about 65°F

Summary of Activities: The visual site inspection (VSI) began at 9:30 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations. Facility representatives provided the inspection team with copies of requested available documents.

The VSI tour began at 10:30 a.m. The inspection team, along with various facility representatives walked through the facility to observe areas where hazardous constituents and solid wastes were formerly managed. Photographs of the various areas were taken by both RAI and facility representatives. The first area viewed was the facility's Former TCA UST Area (AOC 2). The inspection team was then taken to observe the location of the Former Hazardous Waste Drum Storage Area (SWMU 1). Next, the inspection team observed the location of the facility's Former Neutralization Tank (SWMU 2). The last area viewed was the Former Fuel USTs Area (AOC 1).

The tour concluded at 11:15 a.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 11:45 a.m.



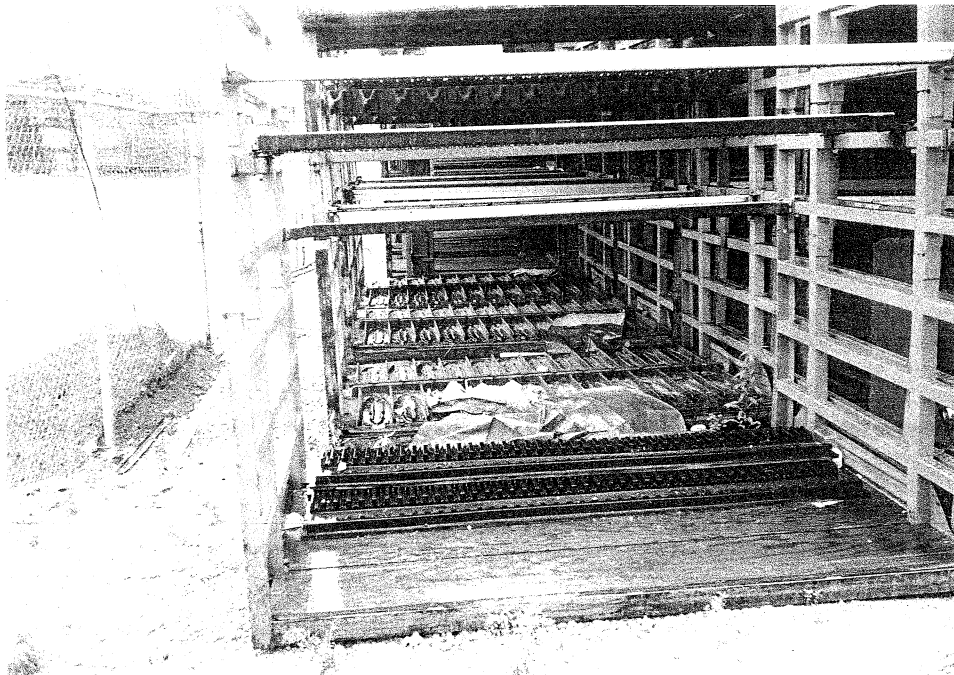
Photograph No. 3

Location: SWMU 2

Orientation: North

Date: 06/02/93

Description: View of the location where the Former Neutralization Tank was situated. Metal racks were stored in this area upon gravel and stone.



Photograph No. 4

Location: AOC 1

Orientation: West

Date: 06/02/93

Description: View of the Former Fuel USTs Area. Metal racks were being stored on the ground in this area.



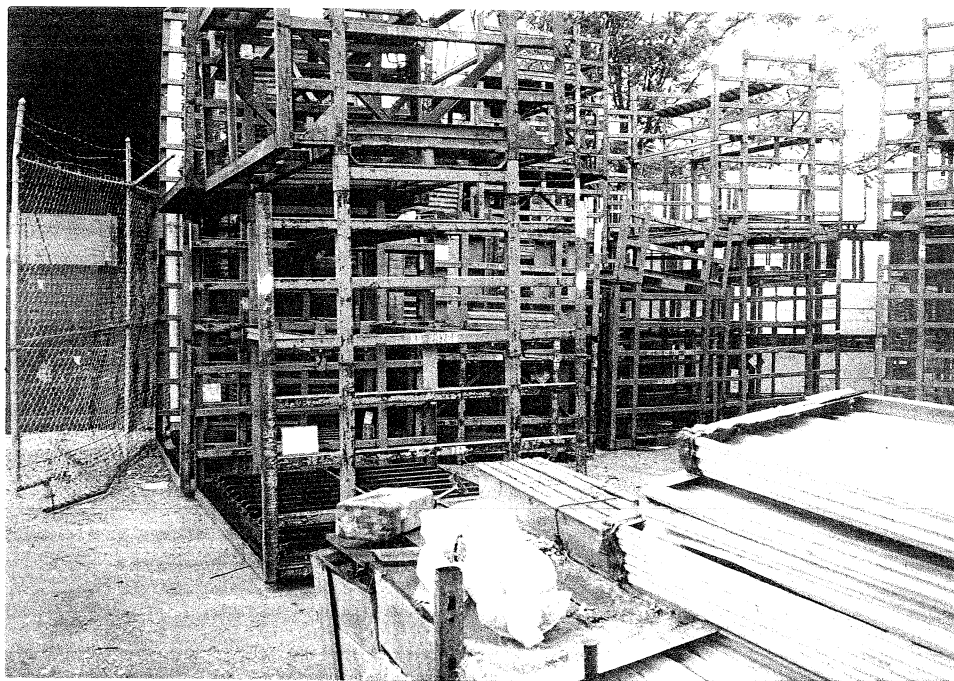
Photograph No. 1

Orientation: East

Location: AOC 2

Date: 06/02/93

Description: View of the Former TCA UST Area. The ground was covered with gravel. Metal storage racks were being kept in portions of this area.



Photograph No. 2

Orientation: North

Location: SWMU 1

Date: 06/02/93

Description: View of the Former Hazardous Waste Drum Storage Area. The area was being used as a storage area for metal racks.

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

GMC - TRUCK/BUS - FORMER ULBRICH CHEMICAL

9:30 AM - Introduction

6/2/93

Explanation of purpose of inspection

398 Division St. (Former Ulbrich)

Current uses: offices for training, negotiations in past
had area used for rock, forklift driver training

GMC TRUCK/BUS Group

2 Months ago requested name change to

G-M North American Truck (entire facility)

Purchase of Ulbrich facility ~ June 1982

had been under consideration

Republic Steel → ULBRICH 61

Built for Truscon Steel in 1929 as steel warehouse

Truscon steel to Republic Steel

Repair of Roofs

cutting, welding, grinding

Scrap metal goes back to main plant
and then out as scrap for recyclingUsed office space almost shortly after
acquiring property

N. Hale 6/2/93

Former Ulrich Chemical

~ 36,000 SF warehouse

~ 4,000 S.F. office

2.1 acres property

5+ trainings (5-10 typically)

~~Main Plant~~White River - N ($\frac{1}{2}$ mile)

Pond - SW (Wentworths Air Brake)

→ much closer than river

surrounding area is industrial

area is on city water

G-M has industrial water well - approx 90 ft (in use)

have some other wells - inactive (but usable)

School # 27 ~ $\frac{1}{2}$ mile SE of Ulrich facility→ 6-8th grades

No known fires - 225 CYs removed

from VSTs - to Adams Center

landfill - under plant ID# (not which ID#)

IND 079 583 720

4 VSTs removed

2 gasoline (6K, 10K)

1 Diesel (10K)

1 - 1,1,1-TCA (10K)

W. Enki 6/2/93

Former Ulster Chemical

Don't know if Ulster had air permits

Access is controlled by fence

patrolling guard from adjacent operations

are in the process of adding air cleanup system

No complaints about ^{former} Ulster facility

Main plant produces sheet metal parts
for light duty trucks

Discharge is to sanitary sewer (combined)
on Division street to Belmont POTW

Are adding alarm/sprinkler

add CO₂ for dust control

Phases H2	former		
304	11-TC4 US Ave	E	
304	former HW Drives St Ave	N	
506	former WWTS / Neutralization tank	N	
709	former VST (gasoline/chemicals)	W	

W Earle 6/2/93