



Quarterly Technical Progress Report April 2016 – June 2016

RCRA Corrective Action - IND 980 700 801
2915 Dr. Martin Luther King Jr. Boulevard, Anderson, IN
Revitalizing Auto Communities Environmental Response Trust

Indiana Department of Environmental Management

GHD | 6520 Corporate Drive Indianapolis Indiana 46278
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Appendix A Project Fact Sheet 21 (July 2016)



1. Introduction

GHD, 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 (IM) activities, and Corrective Measures (CM) at the Facility for the period of April through June 2016.

2. Summary of RFI, Interim Measures, and Corrective Measures Activities

2.1 RCRA Facility Investigation/Environmental Indicators Determination

There were no RFI activities conducted during this reporting period.

RFI activities are 100-percent complete.

2.2 Interim Measures

Interim measures being conducted at the Site consist of routine groundwater and surface water monitoring and related reporting in accordance with the Site-wide Groundwater Monitoring Plan (AECOM, 2010) and subsequent recommendations made in the 2011 through 2015 Annual Groundwater Monitoring Reports.

Semi-annual groundwater and routine surface water monitoring was conducted between April 18, and April 22, 2016.

Monitoring well MW 97-14 was installed in 2014 south of the irrigation pond on the Meadowbrook Golf course south of the Site. The monitoring well was installed in the winter months during a period of snow cover and was inadvertently installed in a nuisance area for the owner and users of the Meadowbrook Golf Course. As such, on May 23, 2016, monitoring well MW 97-14 was decommissioned and replaced at a nearby location by monitoring well MW 97R-16. Monitoring well details, including a stratigraphic and instrumentation log for MW 97R-16, will be included in the 2016 Annual Monitoring Report.

Interim measures are ongoing.

2.3 Corrective Measures

To support development of a revised Corrective Measures Proposal, activities conducted during this reporting period included implementation of the Chromium Groundwater Investigation Work Plan



(GHD, March 9, 2016) (Work Plan). The Work Plan was implemented between April 21 and 26, 2016 concurrent to routine semi-annual groundwater sampling to confirm the presence or absence of chromium and hexavalent chromium in groundwater at the perimeter of and downgradient to the Site using non-routine laboratory analytical methods with lower detection limits. A summary of the findings from the Work Plan implementation is provided in Section 3.0.

On May 11, 2016, representatives of the Indiana Department of Environmental Management (IDEM), RACER Trust, and GHD participated in a working session to discuss risk drivers and remedial alternatives for the Site and to develop a consensus amongst stakeholders on a general strategy for Corrective Measures.

3. Summary of Findings

3.1 RCRA Facility Investigation/Environmental Indicators Determination

There were no RFI activities conducted during this reporting period.

3.2 Interim Measures

Between April 18 and April 22, 2016, semi-annual groundwater and routine surface water monitoring was completed. The field data, validated analytical data and discussion of results will be provided to IDEM in the 2016 Annual Groundwater Monitoring Program Report.

3.3 Corrective Measures

The objective of the Chromium Groundwater Investigation was to assess the groundwater quality at the perimeter of and downgradient to the Site to confirm the presence or absence of chromium and hexavalent chromium in groundwater at very low detection limits. The results of the groundwater sampling indicates that there were no exceedances of the Maximum Contaminant Level (MCL) for chromium (50 µg/L) or IDEM's residential tap water screening level for hexavalent chromium (0.35 µg/L) at any of sampled Unit 3 (sand aquifer) monitoring wells. Chromium and hexavalent chromium were detected at estimated concentrations above the cited criteria at Unit 1 (Fill) monitoring well MW 91-12 where chromium has historically been detected above criteria and has been shown to be delineated laterally and vertically in Unit 1 (Fill). As such, there is no evidence to suggest that chromium or hexavalent chromium groundwater impacts have migrated to downgradient off-Site receptors above acceptable levels.

4. Summary of Changes to RFI, Interim and/or Corrective Measures

There were no changes to the RFI, Interim Measures and/or Corrective Measures during the reporting period.



5. Summary of Contacts with Representatives of Local Community, Public Interest Groups, or State Government

The Chromium Groundwater Investigation Work Plan was submitted to IDEM on March 9, 2016. On April 19, 2016, IDEM approved the Work Plan provided five additional monitoring wells (MW 16, MW 61, MW 63, MW 91-12, and MW 92-13) were included in the sampling program.

On May 11, 2016, representatives from IDEM, RACER Trust, and GHD participated in a working session to discuss risk drivers and remedial alternatives for the Site and to develop a consensus amongst stakeholders on a general strategy for Corrective Measures.

The Environmental Restrictive Covenant for Lot 1 was executed by RACER Trust on March 29, 2016 and recorded on April 1, 2016. On April 28, 2016, IDEM issued a public notice that they intend to issue a "Corrective Action Complete with Controls Determination" for Lot 1. During the public notice period, RACER Trust discussed the proposed action with IDEM to determine if the Determination was appropriate at this juncture. IDEM and RACER Trust determined that the Determination would be postponed pending approval of the CMP amendments.

The Environmental Restrictive Covenant for the former Plant 9 property was executed by Tower Anderson, LLC on June 6, 2016 and recorded on June 29, 2016.

6. Summary of Problems or Potential Problems

During construction activities at the Tract B (North) property in 2015, monitoring wells MW 75 and MW 76 were buried with 1 to 2 feet of gravel fill. In May 2016, GHD was able to find and repair MW 75, but was not able to locate MW 76.

7. Actions Taken To Rectify Problems

GHD will attempt to locate and repair MW 76 in July 2016 when a professional surveyor will be on-Site.

There were no changes to personnel during the reporting period.

8. Projected Work for July through September 2016

Projected work for July through September 2016 includes the following:

- July surface water sampling event
- Locating, assessing and possible repair of Tract B (North) monitoring well MW 76
- Submittal of the Chromium Groundwater Investigation Report of Findings



- Submittal of the May 11, 2016 Corrective Measures working session summary memorandum
- Residential well sampling
- Transfer of the “Lot 1” property (east of Martin Luther King Boulevard) to Tower Anderson LLC

9. Reports and Data

The Quarterly Technical Progress Report, January 2016 through March 2016, was submitted to IDEM on April 26, 2016.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 21 (July 2016) submitted with this Quarterly Technical Progress Report as Appendix A.

Appendices

Appendix A

Project Fact Sheet 21 (July 2016)



Revitalizing Auto Communities Environmental Response Trust

Project Fact Sheet 21 | July 2016 | www.racertrust.org

RCRA CORRECTIVE ACTION REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST

2915 Dr. Martin Luther King Jr. Boulevard (Formerly Pendleton Ave.) Anderson, Indiana

INTRODUCTION

The Revitalizing Auto Communities Environmental Response (RACER) Trust has prepared this Project Fact Sheet to update the local community about environmental activities being conducted at the facility located at 2915 Dr. Martin Luther King Jr. Boulevard (formerly Pendleton Avenue), Anderson, Indiana (Site). These activities are conducted under the oversight of the Indiana Department of Environmental Management (IDEM) and in accordance with an Agreed Order issued for the Site.

The Corrective Action process includes a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of the soil and groundwater conditions at the Site. Based upon an evaluation of the results obtained during these investigations, appropriate corrective measures will be proposed and implemented.

SITE BACKGROUND

The Site is located on the southwest side of Anderson in Madison County, Indiana. Formerly, the facility comprised approximately 3,000,000 square feet of manufacturing area situated on 234 acres. GM operations at the Site began in 1929. Additional plant buildings were constructed and the plants were expanded several times between 1937 and 1989. Demolition of the plant commenced in 2007. Demolition of the main plant buildings and restoration activities were completed in 2009.

As a result of General Motors Corporation's (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 Site, became the property of Motors Liquidation Company (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 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 Site.



PROJECT FACT SHEET

Key documents that have been submitted to U.S. EPA and IDEM and are available for review in the public repository.

The following documents have been submitted since 2008:

- Corrective Measures Plan, March 31, 2008
- Site-Wide Groundwater Monitoring Plan, March 31, 2008
- Notification to IDEM of a new potential contaminant source area, September 5, 2008
- Progress Reports from 1998 to present
- Annual Groundwater Monitoring Reports for 2008 to 2015
- Vapor Intrusion Study Work Plan, July 2010
- Residential Vapor Intrusion Assessment Work Plan, September 1, 2011
- Investigation Work Plan, September 2, 2011
- Vapor Intrusion Study Work Plan Implementation – Technical Memorandum, November 3, 2011
- Residential Vapor Intrusion Assessment Technical Memorandum, March 7, 2012
- Supplemental RFI Results Technical Memorandum, March 7, 2012
- Soil and Perched Groundwater Delineation Work Plan, June 26, 2012
- Wastewater Treatment Plant Source Area Investigation Work Plan, January 4, 2013
- Perched Groundwater Investigation Work Plan, April 3, 2013
- Revised Risk Assessment Approach Letter, April 26, 2013
- Wastewater Treatment Plant Source Area Investigation Technical Memorandum, July 31, 2013
- Revised Risk Assessment Interim Deliverable, August 9, 2013
- Wastewater Treatment Plant Groundwater Investigation Work Plan, September 27, 2013
- Refined Human Health Risk Assessment and Derivation of Site-Specific Risk-Based Screening Levels, October 2013
- Refined Human Health Risk Assessment - Addendum, May 12, 2014
- Perched Groundwater Investigation Report of Findings, May 12, 2014
- RFI Final Report, June 2014
- Residential Well Sampling Work Plan, October 23, 2014
- Revised South Court Soil Investigation and WWTP Plume Boundary Well Installation Work Plan, November 14, 2014
- Wastewater Treatment Plant Groundwater Investigation Report of Findings, March 26, 2015
- City Beautification of Anderson Parking Lot Memorandum, June 1, 2015
- South Court Soil and WWTP Plume Boundary Investigation Report of Findings, June 4, 2015
- Supplemental Analysis in Support of the CMP, August 12, 2015
- Chromium and Hexavalent Chromium Groundwater Data Memorandum, September 23, 2015
- Refined Human Health Risk Assessment – Addendum 2, February 2, 2016
- Chromium Groundwater Investigation Work Plan, March 9, 2016

RCRA CORRECTIVE ACTION

The RACER Trust is currently conducting Corrective Action activities at the Site. Corrective Action activities are required for all facilities that applied for a permit to store hazardous waste and include an evaluation of whether plant waste management operations have impacted the environment. The program includes a RFI that is designed to identify and address any significant risks to human health or the environment resulting from the release of hazardous waste or hazardous constituents to environmental media such as soil or groundwater. The scope of the RFI and required cleanup work has been and will continue to be reviewed with IDEM. The activities will be conducted according to standards that are protective of human health and the environment.

The Corrective Action process uses Environmental Indicators (EIs) to evaluate and report on current site conditions related to potential current human exposure and potential groundwater migration. Under the RCRA program, U.S. EPA's top priority is to make sure that these two Environmental Indicators are satisfied at a given site. MLC submitted reports to IDEM for the two Environmental Indicators to demonstrate that current human exposure and migration of contaminated groundwater are under control. Groundwater monitoring to verify plume stability is ongoing.

IDEM recently issued Notices of Corrective Action Complete for Tract A, Tract B (North), Tracts C to F, and Crawford Field. The notices detail IDEM's Final Decision, stating that RACER Trust has fulfilled its obligations under Indiana's RCRA Corrective Action Program for the noted parcels of land.

RCRA FACILITY INVESTIGATION

RFI activities have been completed at the Site. The purpose of an RFI is to investigate any areas of the Site that may need further action and to determine what additional steps might be appropriate. The results of these investigations, including an assessment of potential risk, were documented in reports that have been submitted to IDEM and copies are available for review in the IDEM's virtual file cabinet. A revised Final RFI Report (Conestoga-Rovers & Associates, June 2014) was submitted to IDEM providing details of historical investigations summarized in the previous Final RFI Reports and is amended with details of investigations conducted since that time. The revised and Final RFI Report was approved by IDEM on July 22, 2014.

A Refined Human Health Risk Assessment was prepared to assess the results of investigations conducted to date to determine whether realistic exposure levels of Site constituents have the potential to adversely affect human health on- or off-Site. This report was submitted to IDEM in October 2013 and approved with the exception of the non-default residential and commercial/industrial vapor intrusion groundwater screening levels in November 2013.

On May 12, 2014 an Addendum to the Refined Human Health Risk Assessment was submitted to IDEM detailing that RACER Trust agreed to use IDEM's Remediation Closure Guide generic residential

and commercial/industrial groundwater vapor exposure screening levels. The Refined Human Health Risk Assessment, coupled with the Addendum, was approved by IDEM on May 19, 2014.

RFI activities are 100-percent complete.

COMPLETED INTERIM MEASURES

Interim Measures (IM) were conducted in the South Court Area in July 2005 to address concentrations of trichloroethene (TCE) in a small area of soil and shallow groundwater that were significantly higher than in the surrounding area.

Soil was excavated to the depth of the perched water table at approximately 8 feet below ground and disposed off-site. Hydrogen-Releasing Compound® (HRC) was mixed into soil at the bottom of the excavation, to enhance degradation of TCE in groundwater. Following placement of the HRC®, the excavation was backfilled and the pavement replaced.

Interim measures were also conducted in 2007 to plug and abandon five former groundwater production wells at the facility. This work was performed according to Indiana Department of Natural Resources guidelines.

The RACER Trust continues to complete interim Site-wide groundwater monitoring in accordance with the Site-wide Groundwater Monitoring Plan.

CORRECTIVE MEASURES

A draft Corrective Measures Proposal was submitted to IDEM in March 2008. A revised corrective measures proposal will be prepared as necessary incorporating the results of activities completed since the time the initial proposal was submitted, including a revised Human Health Risk Assessment and additional investigations. Environmental Restrictive Covenants for Tract A, Tract B (North), Tracts C to F, Crawford Field, Lot 1 and former Plant 9 have been completed, approved by IDEM and recorded.

REDEVELOPMENT

RACER Trust is currently looking to sell or donate portions of the Site for redevelopment. On April 1, 2015, the northern portion of the former main manufacturing building area was sold to GDI Construction.

UPCOMING ACTIVITIES

Routine groundwater and surface water monitoring and reporting is ongoing. Residential tap sampling and reporting will be completed. A revised Corrective Measures Proposal will be developed.

PUBLIC PARTICIPATION

An information repository has been established where current project related documents are available for public review. The information repository is located at:

Anderson Public Library

111 East 12th Street
Anderson, IN 46016
Tel: (765) 641-2450

Project Fact Sheets will be issued periodically during the implementation of the Corrective Action program to keep the community informed of ongoing activities at the Site.

CONTACT INFORMATION

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