



**QUARTERLY TECHNICAL PROGRESS REPORT  
JANUARY 2010 THROUGH MARCH 2010  
RCRA CORRECTIVE ACTION  
IND 980 700 801**

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MOTORS LIQUIDATION COMPANY, ANDERSON, INDIANA**

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

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## **1.0 INTRODUCTION**

Conestoga-Rovers and Associates (CRA), on behalf of Motors Liquidation Company (MLC), has prepared this Quarterly Technical Progress Report for the MLC 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, and Corrective Measures (CM) at the Facility for the period of January through March 2010.

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

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

A summary of the RFI activities conducted during this reporting period is provided in the following paragraphs.

On October 27, 2009 IDEM provided MLC with comments that were prepared in response to General Motors Corporation's (GM's) September 24, 2008 responses regarding the Final RFI Report. IDEM's October 27, 2009 comments requested validation of vapor intrusion (VI) modeling results using paired sub-slab/indoor air monitoring data to support the Site-specific human health risk assessment presented in the Final RFI Report. Additionally, IDEM requested revisions to the toxicity criteria utilized in the Site-specific human health risk assessment presented in the Final RFI Report. On January 28, 2010, MLC provided a response to IDEM's October 27, 2009 comments agreeing to revise the toxicity criteria in the Final RFI Report, as requested, and to conduct sub-slab and indoor air monitoring at the former Plant 9 building.

The RFI activities are considered 95-percent complete.

### **2.2 INTERIM MEASURES**

Interim groundwater monitoring and reporting is ongoing in accordance with the draft Groundwater Monitoring Plan however no field activities were conducted during this reporting period.

On March 16, 2010, IDEM requested submittal of a revised Groundwater Monitoring Plan to incorporate IDEM's June 9, 2008 comments and the one-time groundwater sampling of approximately 20 monitoring wells across the Site for metals analysis.

Interim groundwater monitoring and reporting is ongoing. Other interim measures activities, as discussed in the draft Corrective Measures Proposal, are considered 100-percent complete.

### **2.3 CORRECTIVE MEASURES**

A draft Corrective Measures Proposal (CMP) was submitted to IDEM on March 26, 2008. The CMP describes the proposed Corrective Measures for areas of the Site that were determined in the Final RFI Report to pose a potentially significant risk for reasonable maximum exposures under current and/or future land use.

No corrective measures activities were conducted during the period of January 1 through March 31, 2010. With the exception of submittal of the draft CMP, the corrective measures activities have not commenced and are considered 0-percent complete.

MLC continues to work through the bankruptcy process.

### **3.0 SUMMARY OF FINDINGS**

There are no findings to report for this reporting period.

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

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.

Based on correspondence between MLC and IDEM, MLC anticipates the need to modify the Groundwater Monitoring Program to incorporate additional sampling and analysis as discussed in Section 5.0.

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

Several discussions were conducted throughout the reporting period between representatives of IDEM and MLC to discuss the Remediation Cost Estimate prepared by MLC. Through the discussions surrounding the Remediation Cost Estimate and IDEM's March 16, 2010 electronic mail correspondence to Mr. David Favero, IDEM requested, and MLC agreed, to conduct the following activities:

- Submit a revised Groundwater Monitoring Plan to incorporate IDEM's June 9, 2008 comments
- One-time Site-wide hydraulic monitoring
- The installation of three new monitoring wells in the vicinity of the northeast plume boundary to facilitate the one-time collection and analysis of groundwater for volatile organic compounds
- One-time groundwater sampling and analysis of approximately 20 monitoring wells for metals

## 6.0 SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS

No problems were encountered during the reporting period.

## 7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS

No problems were encountered during the reporting period.

## 8.0 CHANGES IN PERSONNEL

There were no changes to personnel during the reporting period.

## 9.0 PROJECTED WORK FOR APRIL THROUGH JUNE 2010

Projected work for April through June 2010 includes the following:

- Preparation of the 2009 Annual Groundwater Report
- Preparation of the revised Site-Wide Groundwater Monitoring Plan
- Continue to work through the bankruptcy process

## 10.0 REPORTS AND DATA

The Quarterly Technical Progress Report for October through December 2009 was submitted to IDEM on July 22, 2010.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 9 (July 2010) submitted with this Quarterly Technical Progress Report in Appendix A.

No field or analytical data were generated during the reporting period.

APPENDIX A

FACT SHEET

## RCRA CORRECTIVE ACTION MOTORS LIQUIDATION COMPANY 2915 Dr. Martin Luther King Jr. Boulevard (Formerly Pendleton Avenue) ANDERSON, INDIANA

### INTRODUCTION

Motors Liquidation Company [formerly known as General Motors Corporation (GM)] 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 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 result of GM's June 2009 bankruptcy, certain operating assets of GM were sold to a newly formed company, which is now known as General Motors LLC. Existing, non-continuing assets remained the property of "old" GM, which is now known as Motors Liquidation Company (MLC), in its capacity as a debtor-in-possession in the bankruptcy case. Portions of the Site were historically sold to other companies. The portions of the Site not sold by (old) GM remain the property of MLC.



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 2005:

- Interim Measures Work Plan for South Court Area, March 21, 2005
- RCRA Facility Investigation Stage II Data Report, March 30, 2005
- RCRA Facility Investigation Report, August 12, 2005
- Documentation of Environmental Indicators Determination, September 20, 2005
- Interim Site-Wide Groundwater Monitoring Plan, September 20, 2005
- Interim Measure Work Plan - Production Well Abandonment, July 27, 2006
- 2006 Annual Groundwater Monitoring Report, January 31, 2007
- Response to IDEM's Comments on Final RFI Report, April 5, 2007
- Revised Final RFI Report and Response to IDEM's Comments, September 27, 2007
- Production Well Abandonment Memo, November 16, 2007
- 2007 Annual Groundwater Monitoring Report, January 31, 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 covering February 1998 through September 2009
- 2008 Annual Groundwater Monitoring Report, February 2009
- 2009 Annual Groundwater Monitoring Report, July 2010
- Vapor Intrusion Study Work Plan, July 2010

## RCRA CORRECTIVE ACTION

MLC 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 RCRA Facility Investigation (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.

## 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 were documented in reports that have been submitted to IDEM and copies are available for review in the information repository at the local library. MLC has provided responses to IDEM comments on the Final RFI Report, the latest of which were provided to IDEM in January 2010 agreeing to conduct a vapor intrusion study at the Site.

## 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 sampling conducted in December 2004 identified that the TCE concentrations were highest in an area of approximately 20 x 35-feet.

Soil was excavated from the 20 x 35-foot area, to the depth of the perched water table at approximately 8 feet below ground. The soil was temporarily staged in rolloff boxes during excavation and then disposed of 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. TCE concentrations in groundwater have decreased since the IM was conducted.

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.

MLC continues to complete interim site-wide groundwater monitoring.

## CORRECTIVE MEASURES

A Corrective Measures Proposal and a site-wide Groundwater Monitoring Plan were submitted in March 2008. MLC continues to work through the bankruptcy process.

## UPCOMING ACTIVITIES

Groundwater monitoring and reporting is ongoing. A vapor intrusion study will be conducted in the Winter of 2010/2011.

## 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

### IDEM

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Toll free: (800) 451-6027

### MLC

David Favero  
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