



**QUARTERLY TECHNICAL PROGRESS REPORT  
APRIL 2012 - JUNE 2012  
RCRA CORRECTIVE ACTION  
IND 980 700 801**

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

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

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## 1.0 INTRODUCTION

Conestoga-Rovers and Associates (CRA), on behalf of the Revitalizing Auto Communities Environmental Response (RACER) Trust, has prepared this Quarterly Technical Progress Report for the RACER Trust facility located at 2915 Dr. Martin Luther King Junior Boulevard in Anderson, Indiana (Facility or Site).

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 2012.

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

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

RFI activities conducted during this reporting period included the preparation and submittal of the Soil and Perched Groundwater Delineation Work Plan (CRA, June 25, 2012). On behalf of RACER Trust, CRA submitted to IDEM a Soil and Perched Groundwater Delineation Work Plan (CRA, June 25, 2012) to conduct additional surface and sub-surface soil and groundwater investigations at the Site. The objective of the proposed scope of work is to delineate the extent of impacts identified during soil and perched groundwater investigations conducted in late 2011.

The RFI activities are considered 95-percent completed.

### **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 2010 Annual Groundwater Monitoring Report.

On behalf of RACER Trust, CRA submitted a request for modifications to the Site-Wide Groundwater Monitoring Plan to IDEM on April 18, 2012. The request included the addition of MW89-11 to the semi-annual groundwater monitoring program and the collection of semi-annual surface water level measurements at the former stormwater pond. The request to add MW89-11 to the Site-Wide Groundwater Monitoring Plan was approved by IDEM on May 14, 2012.

Semi-annual groundwater and routine surface water monitoring was conducted between May 14 and May 16, 2012.

### **2.3 CORRECTIVE MEASURES**

No corrective measures activities were conducted during this reporting period.

With the exception of submittal of the draft Corrective Measures Proposal (CRA, March 2008), the corrective measures activities have not commenced and are considered 0-percent complete.

### **3.0 SUMMARY OF FINDINGS**

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

The implementation of the Soil and Perched Groundwater Delineation Work Plan will commence during the week of July 2, 2012. A technical report presenting the field activities conducted, analytical data generated therefrom, and a discussion of the validated/verified analytical results will be provided to IDEM as an addendum to the revised Final RFI Report.

#### **3.2 INTERIM MEASURES**

Between May 14 and May 16, 2012, semi-annual groundwater monitoring and routine surface water monitoring was completed. The field data, validated analytical data and discussion of results will be provided to IDEM in the 2012 Annual Groundwater Monitoring Program Report.

#### **3.3 CORRECTIVE MEASURES**

No corrective measures activities were conducted during this reporting period.

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

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Following discussions between IDEM and RACER Trust, an agreement on the approach to finalizing the Final RFI Report was reached. On June 12, 2012, it was agreed that the Final RFI Report would be revised to address IDEM's October 2009 comments based on the toxicity data and regulations available/in place at the time the comments were prepared. As RACER Trust proceeds with additional investigations and/or remediation, updated criteria and regulatory guidance will be incorporated into addenda to the Final RFI Report.

The Site-Wide Groundwater Monitoring Plan has been revised to incorporate MW89-11 in future groundwater monitoring events beginning with the spring 2012 monitoring event.

There were no changes to the Corrective Measures during the reporting period.

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

On April 18, 2012, CRA requested modifications to the Site-Wide Groundwater Monitoring Plan from IDEM.

On May 14, 2012, IDEM approved the addition of MW89-11 to routine groundwater monitoring as detailed in the Site-Wide Groundwater Monitoring Plan.

On June 12, 2012, RACER Trust received written confirmation from IDEM on the approach to finalizing the Final RFI Report.

On June 12, 2012, CRA submitted the draft Soil and Perched Groundwater Delineation Work Plan to IDEM.

On June 21, 2012, IDEM, RACER Trust, and CRA had a conference call to discuss the draft Soil and Perched Groundwater Delineation Work Plan.

On June 25, 2012, CRA submitted the revised Soil and Perched Groundwater Delineation Work Plan to IDEM.

## 6.0 SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS

The routine groundwater and surface water monitoring activities were inadvertently delayed by two to three weeks as a result of subcontractor procurement delays.

## 7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS

CRA and its subcontractor (AECOM) expedited review and approval of contract terms and conditions to facilitate completion of groundwater and surface water monitoring in a timeframe as close as possible to that outlined in the Site-Wide Groundwater Monitoring Program.

## 8.0 CHANGES IN PERSONNEL

There were no changes to personnel during the reporting period.

## 9.0 PROJECTED WORK FOR JULY THROUGH SEPTEMBER 2012

Projected work for July through September 2012 includes the following:

- Completion of surface water sampling in July 2012 in accordance with the Site-Wide Groundwater Monitoring Plan
- Completion of the Soil and Perched Groundwater Delineation Work Plan field activities
- Preparation and submittal of revisions to the Final RFI Report to address IDEM's September 14, 2011 comments

## 10.0 REPORTS AND DATA

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 13 (July 2012) submitted with this Quarterly Technical Progress Report as Appendix A.

APPENDIX A

PROJECT FACT SHEET 13 - JULY 2012



# Revitalizing Auto Communities Environmental Response Trust

Project Fact Sheet 13 | July 2012 | [www.racertrust.org](http://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 2006:

- Interim Measure Work Plan - Production Well Abandonment, July 27, 2006
- 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
- 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 2006 to 2011
- 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

## 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.

## 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.

This Study was conducted in February and March 2011, the results of which demonstrate that there is no current unacceptable risk due to vapor intrusion on Site.

Due to new Areas of Interest identified during building demolition activities, additional investigations of soil and groundwater quality were conducted in November and December 2011. Further investigation is scheduled for Summer 2012.

## 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 to address the results of activities completed since the time of the initial proposal.

## UPCOMING ACTIVITIES

Investigation of recently identified AOIs is ongoing. Routine groundwater and surface water monitoring and reporting is ongoing. Design of additional Interim and Corrective Measures, as necessary, will be conducted following receipt and review of proposed soil and groundwater investigation data.

## 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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### RACER Trust

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