



Semi-Annual Technical Progress Report July 2017 – December 2017

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



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Appendix A Project Fact Sheet 24 (January 2018)



1. Introduction

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

This Semi-Annual 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 July through December 2017.

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 2016 Annual Groundwater Monitoring Reports.

On July 12, 2017, surface water samples were collected from the irrigation pond at the Meadowbrook Golf Course in accordance with the Site-Wide Groundwater Monitoring Plan. Semi-annual groundwater and routine surface water monitoring was conducted between October 3, and October 19, 2017 in accordance with the Site-Wide Groundwater Monitoring Plan.

Interim measures are ongoing.

2.3 Corrective Measures

Corrective measures alternatives were evaluated as part of the development of the revised draft Corrective Measures Proposal (CMP). On behalf of RACER Trust, GHD submitted the revised draft CMP to the Indiana Department of Environmental Management (IDEM) for discussion purposes on November 23, 2017.

To support development of the revised CMP, the Residential Well Sampling Work Plan (GHD October 23, 2014) was implemented between June 7 and July 21, 2017 to assess if the eight potables water wells in the vicinity of the Site previously sampled in 2000, are in use and to assess the groundwater for the presence of volatile organic compounds (VOCs). The results were reported



to IDEM on December 7, 2017 in the Residential Well Sampling Report of Findings and a summary of the findings from the investigation is provided in Section 3.0.

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

The results of the routine Site-wide monitoring activities conducted in July and October 2017 will be provided through submittal of the 2017 Annual Groundwater Monitoring Report to IDEM on or before January 31, 2018.

3.3 Corrective Measures

The results of the Residential Well Sampling Investigation indicates that private water wells are free of detectable concentrations of Site contaminants of concern (COCs). The well at 3523 Martin Luther King Junior (MLK) Boulevard is the closest accessible private water well south of the Site. Given this well was free of detectable concentrations of Site COC's in 2000 and 2017 and that the South Court plume is stable (not expanding), the water wells further south and east (if any) of 3523 MLK Boulevard are unlikely to contain detectable concentrations of Site COCs.

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

On November 21, 2017, on behalf of RACER Trust, GHD submitted a proposal to IDEM to Develop Bounding Case Semi-Site-Specific Residential and Commercial-Industrial Vapor Intrusion Groundwater Screening Levels.

On December 13, 2017, the 2018 Budget Request was submitted to IDEM.

On February 24, 2017, on behalf of RACER Trust, GHD submitted a response to IDEM's comments on the Chromium Groundwater Investigation Report of Findings (GHD, August 3, 2016). On



April 13, 2017, IDEM provided further comments on GHD's response. On June 7, 2017, on behalf of RACER Trust, GHD submitted a response to IDEM's comments from April 13, 2017. On September 1, 2017, IDEM stated that the response to comments were acceptable and addressed IDEM's questions on the report.

6. Summary of Problems or Potential Problems

Monitoring well MW 76 was not sampled since October 2014 as the monitoring well was covered over with 1- to 2-feet of gravel during construction activities by the new owner of Tract B (North). Multiple unsuccessful attempts to find MW 76 were undertaken.

Monitoring well MW 49 could not be sampled in 2017 as the monitoring well was covered over with railway ties.

7. Actions Taken To Rectify Problems

Upon being unsuccessful in finding the well numerous times, MW 76 was reinstalled as MW 76R-17. MW 76R-17 was sampled and surveyed during the October 2017 sampling event.

RACER Trust is currently evaluating their options to gain access to MW 49 or installing a replacement monitoring well.

8. Changes in Personnel

There were no changes to personnel during the reporting period.

9. Projected Work for January through June 2018

Projected work for January through June 2018 includes the following:

- Preparation and submittal of the 2017 Annual Groundwater Monitoring Report
- Finalize Residential Well Sampling Investigation residence letters
- April groundwater and surface water sampling event
- Approval of the 2018 Budget Request
- Preparation and submittal of the Wastewater Treatment Plant Bedrock Groundwater Investigation Work Plan

10. Reports and Data

The Semi-Annual Technical Progress Report July 2017 – December 2017 was submitted to IDEM on July 26, 2017.



The draft revised Corrective Measures Proposal was submitted to IDEM for discussion purposes on November 23, 2017.

The Residential Well Sampling Report of Findings was submitted to IDEM on December 7, 2017.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 24 (January 2018) submitted with this Semi-Annual Technical Progress Report as Appendix A.

Appendices

Appendix A

Project Fact Sheet 24 (January 2018)



Revitalizing Auto Communities Environmental Response Trust

Project Fact Sheet 24 | January 2018 | 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. The remaining unsold assets, including the Site, were retained by the GMC, which was renamed 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 now owns, 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 2016
- 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
- Chromium Groundwater Investigation Report of Findings, August 3, 2016
- Request for Reduction of Progress Reporting, February 24, 2017
- Residential Well Sampling Report of Findings, December 7, 2017

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 is being 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. A revised Corrective Measures Proposal is in the process of being completed.

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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