



QUARTERLY TECHNICAL PROGRESS REPORT

JANUARY 2014 – MARCH 2014
RCRA CORRECTIVE ACTION
IND 980 700 801

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REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL
RESPONSE TRUST

Prepared for: Indiana Department of Environmental
Management

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Section 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 January through March 2014.

Section 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 preparation of the revised Final RCRA Facility Investigation (RFI) Report, preparation of a response to Indiana Department of Environmental Management's (IDEM's) vapor intrusion comments on the Refined Human Health Risk Assessment (RHHRA), and preparation, submittal, and implementation of the Monitoring Well Decommissioning Work Plan (CRA, March 5, 2014).

The objective of the RHHRA (October 7, 2013) was to document cleanup criteria protective of human health that will be used to develop a remedial strategy for the Site. On November 25, 2013, IDEM accepted the RHHRA with the exception of the non-default residential and commercial/industrial vapor intrusion groundwater screening levels. In response to IDEM's comments, RACER Trust provided IDEM with an alternative approach to developing site-specific groundwater vapor intrusion screening levels for residential and industrial groundwater consistent with Section 10 of IDEM's July 9, 2012 *Remediation Closure Guide*. However, there are currently no buildings present, and use of a deed restriction requiring developers to evaluate certain areas of the Site, and if necessary include engineering controls to mitigate vapor intrusion, would be an efficient approach to addressing the potential for future vapor intrusion risk at the Site. Given this, RACER Trust has agreed to use IDEM's Remediation Closure Guide (RCG) generic commercial/industrial groundwater vapor exposure screening levels found in Table A-6 of the 2012 RCG to assess the vapor inhalation pathway.

Following IDEM approval of the RHHRA, CRA initiated revisions to the Final RFI Report (AECOM and ENVIRON, June 2011). The purpose of the revised Final RFI Report is to summarize the historical information presented by AECOM (previously EarthTech) and supplemental

information generated through CRA-lead investigations at new and existing Areas of Interest (AOIs). The report will provide a comparison of data in tabular form, referencing IDEM's RCG Screening Levels. Soil and groundwater exceedances of the RCG Screening Levels are addressed in the RHHRA.

The Monitoring Well Decommissioning Work Plan (CRA, March 5, 2014) was implemented between March 26 and 31, 2014. The objective of the Work Plan was to decommission monitoring wells north and west of the former main manufacturing building that are not included in the IDEM approved Groundwater Monitoring Plan. The initial steps of the monitoring well decommissioning process were completed, included locating and surveying the monitoring wells, and clearing underground utilities. Monitoring wells were located and surveyed on March 26, 2014 and utilities were cleared on March 27, 2014. Well decommissioning activities were initiated on March 31, 2014 and were completed on April 2, 2014. A summary of the decommissioning activities will be provided in the 2014 Annual Monitoring Report.

2.2 Interim Measures

On January 30, 2014, CRA submitted the 2013 Annual Groundwater Monitoring Report to IDEM on behalf of RACER Trust to summarize the groundwater and surface water sampling activities performed in 2013 and the results generated therefrom.

Interim measures are ongoing.

2.3 Corrective Measures

Corrective measures activities conducted during this reporting period included preparation of the Monitored Natural Attenuation (MNA) evaluation for the Wastewater Treatment Plant (WWTP) volatile organic compound (VOC) groundwater plume, and preparation of Environmental Restrictive Covenants (ERCs).

The objective of the MNA evaluation is to determine the concentrations of select VOCs at target locations upgradient of potential receptors that is not likely to result in a future exceedance of applicable criteria at the receptor location(s). The tasks that have been initiated include:

- Determining relative concentrations of select VOCs near the perceived source area
- Determining current hydraulic conditions and migration pathway of the plume
- Determining the current redox conditions at the Site (aerobic or anaerobic) to select the appropriate biodegradation rate for the model

- Performing model simulations for each VOC of concern to determine the target concentrations by adjusting the source concentration at the source until model predicted concentrations at the receptor points match the criteria
- Performing a sensitivity analysis

Preparation of draft ERCs for the Site is ongoing. The purpose of the ERCs is to ensure residual contamination at the Site does not pose an unacceptable risk to future on-Site receptors.

Section 3.0 Summary of Findings

3.1 RCRA Facility Investigation/Environmental Indicators Determination

The RFI is complete.

3.2 Interim Measures

Groundwater and surface water monitoring activities completed in 2014 were summarized in the 2013 Annual Groundwater Monitoring Report which was submitted to IDEM on January 30, 2014. A brief summary of conclusions from the 2013 Site-wide groundwater and surface water monitoring are provided below.

- The results of the 2013 VOC trend testing was consistent with the testing conducted in 2012 in that ten datasets had significant increasing trends. The locations where the increasing trends were identified were consistent with the locations identified in 2012.
- Consistent with 2012 data, there are two increasing trends for cis-1,2-dichloroethene (cis-1,2-DCE) in the AOC 1 – South Court plume wells (MW49 and MW79).
- Increasing trends continue in several monitoring wells in the former WWTP Area plume. Most of the increasing trends relate to vinyl chloride within and along the tail margin of the plume. However, an increasing trend for cis-1,2-DCE is also noted for MW-4 and for trichloroethene (TCE) at MW 68.
- In 2013, perimeter monitoring wells did not contain VOC contaminants above the reporting limit.
- Three surface water sampling events were conducted in 2013 (April, July, and October) at the surface water monitoring locations referred to as Pond Intake and Pond North at the Meadowbrook Golf Course central irrigation pond. The detected concentrations of vinyl chloride in surface water are within the range of historically detected concentrations but above the relevant Site-specific cleanup criteria (recreator). No other detected parameters exceeded the drinking water criterion.

- Based on groundwater monitoring, the golf course irrigation pond appears to be within the former WWTP Area plume and the plume is expanding in the direction of the pond.
- Based on the 2013 groundwater results, there is no current unacceptable risk to nearby residents due to groundwater volatilization to indoor air.

3.3 Corrective Measures

The MNA evaluation for the WWTP VOC groundwater plume is ongoing. The findings of the evaluation, once completed, will be included in the Corrective Measures Proposal.

Section 4.0 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.

Section 5.0 Summary of Contacts with Representatives of Local Community, Public Interest Groups, or State Government

CRA, on behalf of RACER Trust, prepared a memorandum summarizing the soil and groundwater quality north of the former main manufacturing building (AOI 1), which was submitted to IDEM on January 15, 2014 to facilitate donation of this property to the City of Anderson. The AOI 1 soil data from the RFI indicates that concentrations of arsenic, cadmium, iron, TCE, and benzo(a)pyrene were detected at varying depths above one or more of IDEM's 2013 RCG Screening Levels. Arsenic, cadmium, iron, and TCE were detected at varying depths at concentrations above migration to groundwater screening levels however; these constituents were not detected in groundwater at AOI 1. Arsenic was detected at three locations out of 15 above IDEM's recreational soil direct contact screening level for a community park. Benzo(a)pyrene was detected above the residential direct contact screening level at one location out of 15 but below the recreational direct contact screening levels. These parameters were evaluated as part of the HHRA presented in the RFI Final Report (AECOM and ENVIRON, June 2011) which concluded that there was no significant risk associated with constituents detected in soil and that no further action was warranted for AOI 1. Groundwater concentrations, where detected, were detected below IDEM's RCG Screening Levels. On January 27, 2014, IDEM provided a written response to RACER Trust agreeing with the conclusions of CRA's January 15, 2014 memorandum which stated that of the elevated concentrations that were revealed at the north parking lot, the main constituent of concern

was arsenic. IDEM commented that although the direct contact arsenic levels make the area inappropriate for residential purposes, recreational use of the area would be acceptable.

On February 3, 2014, RACER Trust received approval from IDEM of the 2013 budget reallocation request.

On March 4, 2014 RACER Trust submitted its response to IDEM's November 25, 2013 comments on the RHHRA.

On March 5, 2014, CRA, on behalf of RACER Trust, submitted a Monitoring Well Decommissioning Work Plan to IDEM which was approved by IDEM on March 13, 2014.

On March 6, 2014, RACER Trust submitted a revised 2014 Budget Request to IDEM which was approved by IDEM on March 11, 2014.

On March 13, 2014, IDEM provided comments to CRA and RACER Trust regarding the 2013 Annual Groundwater Monitoring Report.

On March 14, 2014, CRA addressed IDEM's comments regarding the 2013 Annual Groundwater Monitoring Report.

Section 6.0 Summary of Problems or Potential Problems

No problems were encountered during this reporting period.

Section 7.0 Actions Taken To Rectify Problems

No problems were encountered during this reporting period.

Section 8.0 Changes in Personnel

There were no changes to personnel during the reporting period.

Section 9.0 Projected Work for April through June 2014

Projected work for April through June 2014 includes the following:

- Completion of monitoring well decommissioning activities
- Residential tap sampling and reporting
- April groundwater and surface water sampling event
- Second round of groundwater sampling and reporting for the WWTP Groundwater Investigation
- Preparation and submittal of the revised Final RFI Report
- Finalize the draft Environmental Restrictive Covenants for the Site
- Preparation and submittal of the Draft Corrective Measures Proposal

Section 10.0 Reports and Data

A memorandum summarizing the soil and groundwater quality for the north parking area and adjacent fields was submitted to IDEM on January 15, 2014. On January 27, 2014, IDEM approved the findings presented in the memorandum.

The Quarterly Technical Progress Report, October 2013 through December 2013, was submitted to IDEM on January 30, 2014.

The 2013 Annual Groundwater Monitoring Report was submitted to IDEM on January 30, 2014. On March 13, 2014, IDEM responded to RACER Trust and CRA with comments on the report. CRA addressed IDEM's comments through electronic mail communication on March 14, 2014.