



**QUARTERLY TECHNICAL PROGRESS REPORT
JULY 2012 – SEPTEMBER 2012
RCRA CORRECTIVE ACTION
IND 980 700 801**

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

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**Prepared by:
Conestoga-Rovers
& Associates**

6520 Corporate Drive
Indianapolis, Indiana
U.S.A. 46278

Office: (317) 291-7007
Fax: (317) 328-2666

web: <http://www.CRAworld.com>

TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION	1
2.0 SUMMARY OF RFI, INTERIM MEASURES, AND CORRECTIVE MEASURES ACTIVITIES	2
2.1 RCRA FACILITY INVESTIGATION/ENVIRONMENTAL INDICATORS DETERMINATION.....	2
2.2 INTERIM MEASURES.....	3
2.3 CORRECTIVE MEASURES.....	3
3.0 SUMMARY OF FINDINGS	4
3.1 RCRA FACILITY INVESTIGATION/ENVIRONMENTAL INDICATORS DETERMINATION.....	4
3.2 INTERIM MEASURES.....	4
3.3 CORRECTIVE MEASURES.....	4
4.0 SUMMARY OF CHANGES TO RFI, INTERIM AND/OR CORRECTIVE MEASURES	5
5.0 SUMMARY OF CONTACTS WITH REPRESENTATIVES OF LOCAL COMMUNITY, PUBLIC INTEREST GROUPS, OR STATE GOVERNMENT	6
6.0 SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS	7
7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS	8
8.0 CHANGES IN PERSONNEL	9
9.0 PROJECTED WORK FOR OCTOBER THROUGH DECEMBER 2012.....	10
10.0 REPORTS AND DATA	11

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 July through September 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 implementation of the Soil and Perched Groundwater Delineation Work Plan (CRA, June 25, 2012) between July 2 and July 6, 2012. The objective of the Work Plan implementation was to delineate the extent of impacts identified during investigations conducted at the former Bay M26/M27 location, the former 310 Plater Pit, at areas of visibly impacted soil identified beneath the former main manufacturing building floor slab, and during general soil screening conducted beneath the northern portion of the former main manufacturing building.

The results of the initial investigation at the former Bay M26/M27 area indicated that, with the exception of arsenic, the soil quality met IDEM's IDCLs at the time of the investigation. The unfiltered groundwater results indicated that chromium impacts extend northeast and southwest from the former Bay M26/M27 excavation area at concentrations that exceeded IDEM's IDCLs. Based on the direction of groundwater flow (east) and the absence of chromium in perimeter temporary wells, the extent of chromium impacted groundwater has been defined. However, in addition to chromium, groundwater exhibits concentrations of arsenic, copper, and cyanide above the IDCLs, the extent of which is not currently known. As such, two permanent monitoring wells were installed in the Unit 1 perched groundwater zone near the former Bay M26/M27 to facilitate the collection of representative groundwater samples for select total and dissolved metals analysis. However, due to unseasonably dry conditions, groundwater has not recharged in the monitoring wells at a sufficient volume to facilitate well development or groundwater sampling to date.

The results of the initial 310 Plater Pit investigation indicated that, in addition to arsenic that was detected above IDEM's IDCL but below the Site-specific background concentration, copper and lead were detected above the IDCLs at BH13-11 and nickel was detected above the IDCL at BH14-11. As such, one borehole was advanced at BH13-11 and one borehole was advanced at BH14-11 to define the vertical limits of impacts and to assess the potential for soil contaminant migration to groundwater.

The results of the initial investigation at areas of visibly impacted surface soil indicated that with the exception of arsenic, five of the ten areas did not exhibit concentrations of metals above the IDCLs. However, it is noted that limited shallow soil samples (0 to

2 feet bgs) were collected at these areas. As such, surface soil samples were collected to assess the surface soil quality at these areas and to assess the potential risk due to direct contact, if any. Exceedances of the soil IDCLs were identified at five of the investigated areas. As such, in addition to the surface soil sampling, three boreholes were advanced to facilitate the collection of soil samples to delineate the vertical extent of selected soil exceedances.

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 August 2, 2012, three surface water samples, including one field duplicate, were collected from the irrigation pond at the Meadowbrook Golf Course in accordance with the Site-Wide Groundwater Monitoring Plan.

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

Implementation of the Soil and Perched Groundwater Delineation Work Plan was conducted between July 2 and July 6, 2012. Due to unseasonably dry weather conditions, groundwater has not recharged in the two monitoring wells installed near the former Bay M26/M27 area at a sufficient volume to facilitate well development or groundwater sampling. 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 following ground sample collection and analysis.

3.2 INTERIM MEASURES

The surface water samples collected on August 2, 2012 from the irrigation pond on the Meadowbrook Golf Course exhibited detectable concentrations of vinyl chloride ranging from 4.8 to 12 micrograms per liter ($\mu\text{g/L}$) and detectable concentrations of cis-1,2-dichloroethene ranging from 0.72 to 1.5 $\mu\text{g/L}$. No other analyzed parameters were detected above the associated reporting limits. The concentrations of vinyl chloride and cis-1,2-dichloroethene are below the site-specific residential non-potable groundwater use criteria (i.e., 46.3 $\mu\text{g/L}$ and 47,000 $\mu\text{g/L}$, respectively).

Interim groundwater monitoring and reporting is ongoing. The results of the surface water monitoring activities conducted in August 2012 will be submitted with the 2012 Annual Groundwater Monitoring Report due to IDEM on January 31, 2013.

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**

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

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

There were no contacts with representatives of the community or public interest groups during this reporting period.

On September 10, 2012, RACER Trust discussed the on-Site agricultural land use with representatives from IDEM. RACER Trust and IDEM agreed that the agricultural land use area was not subject to RCRA Corrective Action and that any investigations of the agricultural land use area, if any, would be in the context of due diligence in support of any pending property transactions.

6.0 SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS

Implementation of the Soil and Perched Groundwater Delineation Work Plan was conducted between July 2 and July 6, 2012. Due to unseasonably dry weather conditions, groundwater has not recharged in the two monitoring wells installed near the former Bay M26/M27 area at a sufficient volume to facilitate well development or groundwater sampling. As such, completion of the Work Plan implementation has been delayed.

7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS

CRA is conducting routine visits to the Site to monitor for groundwater recovery in the two newly installed wells in the vicinity of the former Bay M26/M27 area. Once the wells have sufficient groundwater recovery, wells will be developed and sampled a minimum of 24 hours following well development.

8.0 CHANGES IN PERSONNEL

CRA will be the primary consultant completing the RFI Final Report and ongoing groundwater and surface water monitoring activities thereby reducing ENVIRON and AECOM's respective roles in the project. This change is being pursued in the interest of making administration of the project more efficient.

9.0 PROJECTED WORK FOR OCTOBER THROUGH DECEMBER 2012

Projected work for October through December 2012 includes the following:

- Completion of routine groundwater and surface water monitoring in October 2012 in accordance with the Site-Wide Groundwater Monitoring Plan
- Completion of Wastewater Treatment Plant (WWTP) Source Area Soil Investigation
- Preparation and submittal of revisions to the Final RFI Report to address IDEM's October 2009 comments.

10.0 REPORTS AND DATA

The Quarterly Technical Progress Report, April 2012 through June 2012, was submitted to IDEM on August 3, 2012.