



# Quarterly Technical Progress Report October 2015 – December 2015

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

6520 Corporate Drive Indianapolis Indiana 46278

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Appendix A Project Fact Sheet 20 (January 2016)

# 1. Introduction

GHD, 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 October through December 2015.

# 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 conducted during this reporting period included Site-wide hydraulic monitoring, semi-annual groundwater sampling, and fall surface water sampling in accordance with the Site-wide Groundwater Monitoring Plan (AECOM, 2010) and subsequent recommendations made in the 2011 to 2014 Annual Groundwater Monitoring Reports. These IM activities were conducted between October 7 and October 20, 2015.

Interim measures are ongoing.

## 2.3 Corrective Measures

Corrective Measures activities conducted during this reporting period included preparation of Environmental Restrictive Covenants (ERCs). The purpose of the ERCs is to ensure residual contamination at the Site does not pose an unacceptable risk to future on-Site receptors.

In addition to the ERCs, residual soil contamination at select areas of the former main manufacturing building will be further assessed. Following a conference call with IDEM and RACER Trust, GHD documented a proposed approach to the residual soil contamination in its email correspondence to IDEM on September 23, 2015. IDEM approved the proposed approach on October 30, 2015.

### 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 October 2015 will be provided through submittal of the 2015 Annual Groundwater Monitoring Report to IDEM on or before January 31, 2015.

#### 3.3 Corrective Measures

No data with respect to corrective measures was generated during this reporting period.

### 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 September 23, 2015, GHD, on behalf of RACER Trust, sent email correspondence to IDEM documenting its proposed approach to further assessing/addressing residual soil impacts beneath the southern portion of the former main manufacturing building. On October 30, 2015, IDEM indicated its approval of the proposed approach.

On October 28, 2015, on behalf of RACER Trust, GHD submitted the final ERC for Lot 1 to IDEM. On November 2, 2015, IDEM approved the ERC for Lot 1.

On November 16, 2015, on behalf of RACER Trust, GHD finalized the 2016 Budget Request. On November 30, 2015, IDEM approved the 2016 Budget Request.

### 6. Summary of Problems or Potential Problems

Monitoring wells MW 75 and MW 76 could not be sampled during the October sampling event as the monitoring wells have been covered over with 1- to 2-feet of gravel during construction activities by the new owner of Tract B (North). RACER Trust is working with the developer of the property to repair/replace the wells.

## 7. Actions Taken To Rectify Problems

No problems were encountered during this reporting period.

## 8. Changes in Personnel

There were no changes to personnel during the reporting period.

## 9. Projected Work for January through March 2016

Projected work for January through March 2016 includes the following:

- Preparation and submittal of the 2015 Annual Groundwater Monitoring Report
- Decommissioning and replacement of monitoring well MW 97-14

## 10. Reports and Data

The Quarterly Technical Progress Report, July 2015 through September 2015, was submitted to IDEM on October 26, 2015.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 20 (January 2016) submitted with this Quarterly Technical Progress Report as Appendix A.

# Appendices

# Appendix A

## Project Fact Sheet 20 (January 2016)



# Revitalizing Auto Communities Environmental Response Trust

Project Fact Sheet 20 | January 2016 | [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 2014
- 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

## 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.

On May 19, 2015, IDEM issued a Notice of Corrective Action Compete with Controls letter detailing IDEM's Final Decision stating that RACER Trust has fulfilled its obligations under Indiana's RCRA Corrective Action Program for the northern portion of the former main manufacturing building.

## 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 will be 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, and Crawford Field have been completed and approved by IDEM.

## 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. Remaining Environmental Restrictive Covenants for the Site will be finalized. Residential tap sampling and reporting may be completed. A revised Corrective Measures Proposal will be developed.

## **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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