



Quarterly Technical Progress Report July 2015 – September 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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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 July through September 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 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 to 2014 Annual Groundwater Monitoring Reports.

On July 10, 2015, 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.

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 looking forward to development of the Corrective Measures Proposal (CMP), GHD completed a desk top volatile organic compound (VOC) groundwater plume stability analysis (GHD, August 12, 2015) as an additional line of evidence assessing whether the unsaturated soils in the Wastewater Treatment Plant (WWTP) and/or South Court areas are acting as ongoing source(s) to VOC groundwater impairment. The summary of findings from the desk top analysis is provided in Section 3.0.

The findings from GHD's Refined Human Health Risk Assessment (Conestoga-Rovers & Associates, October 2013) indicated that chromium in groundwater is a pragmatic risk driver for on- and/or off-Site receptors. As such, GHD prepared the Chromium and Hexavalent Chromium Groundwater Data Technical Memorandum (GHD, September 23, 2015) to summarize historical on- and off-Site chromium and hexavalent chromium groundwater data. This Technical Memorandum was prepared to facilitate discussions and decision making with IDEM.

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

On July 10, 2015, three surface water samples, including one field duplicate, were collected from the irrigation pond at the Meadowbrook Golf Course. The surface water samples exhibited detectable concentrations of 1,1-dichloroethane ranging from 5.2 to 5.8 micrograms per liter ($\mu\text{g/L}$), cis-1,2-dichloroethene ranging from 93 to 110 $\mu\text{g/L}$, trans-1,2-dichloroethene ranging from 3.1 to 3.5 $\mu\text{g/L}$, and vinyl chloride ranging from 7.7 to 8.0 $\mu\text{g/L}$. The results of the surface water analyses have been compared to the Site-Specific Recreator Criteria which is protective of human direct contact with surface water. With the exception of vinyl chloride, all detected constituents are below the Site-Specific Recreator Criteria. No other analyzed parameters were detected above the associated reporting limits.

The field data, validated analytical data and discussion of results will be provided to IDEM in the 2015 Annual Groundwater Monitoring Program Report.

3.3 Corrective Measures

The results of the VOC plume stability analysis concluded that, while there is sufficient evidence of natural degradation occurring, there is likely an on-going source of trichloroethene (TCE) contributing to dissolved TCE in the South Court area groundwater and there is sufficient TCE mass in the soils to account for the observed groundwater concentrations. The results of the analysis provided further evidence that there does not appear to be a constant TCE source in the unsaturated zone of the WWTP area. The analysis concluded that TCE equivalent is decreasing in concentration and mass, while increasing in plume area and that the plume is advancing downgradient along the predominant flow direction.

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

The ERC for Tract A was executed on August 13, 2015 and recorded in the office of the recorder of Madison County on August 18, 2015.

When developing the ERC for Tract C, a mistake was made and an earlier incorrect version was recorded with Madison County. On August 18, 2015, the ERC termination recording to “remove” the incorrect ERC for Tract C was executed and the correct ERC for Tract C was recorded.

On August 21, 2015 a conference call between IDEM, RACER Trust, and GHD was conducted to discuss the following items: Plume Stability Analysis for the South Court and WWTP Plumes, Wastewater Treatment Plant Groundwater Investigation Report of Findings, Tract B (South) soil impacts, chromium groundwater data and the ERC for Lot 1.

On September 15, 2015, RACER Trust submitted the draft ERCs for the Former Plant 9 Property and Lot 1 to IDEM for review and/or approval.

On September 18, 2015, RACER Trust submitted the 2015 Budget Reallocation Request to IDEM for the Supplemental Analysis in Support of the Corrective Measures Proposal. On September 21, 2015, IDEM approved the 2015 Budget Reallocation Request.

On September 21, 2015, on behalf of RACER Trust, GHD submitted the draft 2016 Budget Request to IDEM.

6. Summary of Problems or Potential Problems

No problems were encountered during this reporting period.

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 October through December 2015

Projected work for October through December 2015 includes the following:

- Site-wide hydraulic monitoring, semi-annual groundwater sampling and fall surface water sampling in accordance with the Site-Wide Groundwater Monitoring Plan
- Finalize the remaining draft ERCs for the Site
- Disposal of investigation derived waste
- Preparation of the 2015 Annual Monitoring Report
- Approval of the 2016 Budget Request

10. Reports and Data

The Quarterly Technical Progress Report, April 2015 through June 2015, was submitted to IDEM on July 31, 2015.

The Supplemental Analysis in Support of the Corrective Measures Proposal Technical Memorandum was submitted to IDEM on August 12, 2015.

The Chromium and Hexavalent Chromium Groundwater Data Technical Memorandum was submitted to IDEM on September 23, 2015.