January 4, 2011

Response to IDEM November 5, 2010 Comments
2009 Annual Groundwater Monitoring Report
Motors Liquidation Company
Dr. Martin Luther King Jr. Boulevard Facility
Anderson, Madison County
IND980700801

1. *The GMP calls for the field analysis of the ground water for ferrous iron. In Section 3.3 of the report, it states that the concentrations of ferrous iron in the ground water were determined in the field using a colorimetric test kit. However, there is no documentation of this analysis being done and the results from the field for ferrous iron were not listed in the report. Please submit the results and documentation from the analysis of the ground water for ferrous iron.*

Response

The discussion in Section 3.3 related to the measurement of ferrous iron in the field is in error. Ferrous iron was inadvertently not obtained from well locations MW-4, MW 40 and MW-57 during 2009. Currently ferrous ion is not a monitored parameter per the October 28, 2010 Site Wide Groundwater Monitoring Plan.

2. *The concentration maps in the report are misleading, because values from past sampling events are reported with the 2009 data. The maps show non-detect, to near non-detect levels along the proposed western edge of the South Court plume: including monitoring wells MW 24, MW 35, MW 52, and MW 54. Since these wells have not been sampled for several years, the extent of the plume in a western direction is unknown. Please revise and resubmit the concentration maps, using and listing only the ground water quality data from the December 2009 sampling event.*

Response

There was no intention by MLC to mislead the IDEM in the way groundwater data was presented. As noted in Section 5.1, the data posted on the isoconcentration plots are the latest available for each well. The isoconcentration maps were prepared consistent with previous annual reports. In lieu of providing complete revisions of the isoconcentation maps, the dates of the posted sample data are shown in the attached Table 1. All of the wells referenced in this comment are currently upgradient. One well (MW 12) is sampled in that area of the property. This well shows significant decreasing trends for both TCE and cis-1,2-DCE. Vinyl chloride has never been found above the reporting limit. For these reasons, the contouring shown is believed to be conservative and we do not propose to change it. For the 2010 annual report, currently in preparation, only the latest 2010 data will be posted.

3. *In the evaluation of this report, IDEM staff noted a couple of issues that may need to be addressed in the future:*

   a. As described in the GMP, there are three monitoring wells screened in the bedrock for which the depth to ground water is measured during each semi-annual sampling event. These monitoring wells, identified as MW 81, MW 82, and MW 83, are positioned nearly in a straight line. Because of this configuration, it is not possible to adequately determine a ground water flow direction in the bedrock aquifer. This is evident by comparing the April and December 2009 potentiometric surface maps in the report. As explained in the report, because of an access problem, different points for

the evaluation of the bedrock potentiometric surface map were used in April and December. The map from the April 2009 event uses monitoring wells MW 62, MW 81, and MW 83, which are in an elongated triangular position. This group of wells shows the ground water flow to the south-southeast. Whereas in December 2009, MW 81, MW 82, and MW 83 were measured, showing a ground water flow direction to the east, along the axis of the three wells.

b. It is recommended that future ground water monitoring reports describe the distribution and magnitude of the BTEX plume across the site. Though the BTEX concentrations are not above health protection standards, future reports should discuss the levels, distribution, and trends of these constituents.

Response

MCL agrees that using only bedrock wells MW 81, MW 82, and MW 83 does not provide the best triangulation for interpreting the direction of groundwater flow in the bedrock aquifer. In order to provide better triangulation in contouring the potentiometric surface of the bedrock aquifer, bedrock well MW 62 will always be measured in conjunction with the other bedrock wells.

Benzene, toluene, and ethylbenzene concentrations are shown on the Figure 4-10A and 4-10B databox plots. Where they occur, exceedences for these compounds are also called out in the sample exceedence tables (Tables 4-7, 4-8, and 4-10) and in the data summary tables (Tables 4-5, 4-6, and 4-9).

Xylene has never been a groundwater constituent of concern at the site. However, should it become a constituent of concern xylene will also be shown in the databox plots and summary tables. Exceedences for all BTEX compounds will continue to be noted in future annual reports and trends will be discussed.

Table 1
Date of Sample Data Posted
on 2009 Isoconcentration Maps
MLC-MLK Bouldevard Site

Monitoring Well	Date of Posted Sample Data	Unit	Monitoring Well	Date of Posted Sample Data	Unit
MW 1	4/18/2001	3s	MW 46	12/16/2009	3s
MW 2R	2/2/2005	3s	MW 47	10/17/2007	3s
MW 3	12/15/2009	3s	MW 48	10/17/2007	3d
MW 5	10/16/2007	3s	MW 49	12/4/2009	3s
MW 6	2/1/2005	3s	MW 50	3/29/2004	3d
MW 7	2/1/2005	3d	MW 51	12/14/2009	3s
MW 8	12/15/2009	3s	MW 52	4/1/2004	3d
MW 9	2/2/2005	3s	MW 53	10/19/2007	3d
MW 10	4/18/2001	3s	MW 54	10/19/2007	3d
MW 11	2/2/2005	3s	MW 55	4/1/2004	3s
MW 12	12/9/2009	3i	MW 56	12/17/2009	3d
MW 13	2/2/2005	3s	MW 57	12/16/2009	3d
MW 14	12/15/2009	3s	MW 58	12/17/2009	3d
MW 15	2/14/2008	3s	MW 59	1/13/2005	3s
MW 16	1/17/2005	3s	MW 60	1/13/2005	3s
MW 17	1/17/2005	3s	MW 61	12/3/2009	3d
MW 18	2/3/2005	3s	MW 63	1/11/2005	3s
MW 19	1/17/2005	3s	MW 64	12/8/2009	3d
MW 20	2/3/2005	3s	MW 65	12/4/2009	3d
MW 21	10/15/2007	3s	MW 66	12/8/2009	3d
MW 22	2/1/2005	3s	MW 67	1/14/2005	3d
MW 23	2/3/2005	3s	MW 68	12/16/2009	3s
MW 24	4/10/2001	3i	MW 69	1/17/2005	3d
MW 25	4/10/2001	3s	MW 70	1/17/2005	3s
MW 26	4/12/2001	3d	MW 72	1/18/2005	3s
MW 28	12/4/2009	3d	MW 73	1/18/2005	3d
MW 29	10/18/2007	3s	MW 75	6/30/2008	3d
MW 35	4/9/2001	3d	MW 76	10/16/2007	3s
MW 36	10/15/2007	3d	MW 78	1/13/2005	3s
MW 37	12/16/2009	3s	MW 79	12/14/2009	3s
MW 38	1/12/2005	3d	MW 80	12/8/2009	3d
MW 39	1/12/2005	3d	MW 84	10/20/2005	3s
MW 40	12/9/2009	3s	MW 85	12/17/2009	3d
MW 41	12/3/2009	3d	MW-1	10/16/2003	3d
MW 42	12/3/2009	3s	MW-2	12/17/2009	3d
MW 43	3/30/2004	3d	MW-3	10/16/2003	3d
MW 44	3/30/2004	3s	MW-4	12/16/2009	3d
MW 45	10/19/2007	3d			