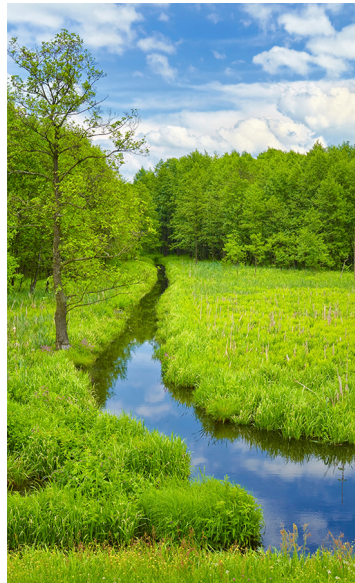




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**QUARTERLY TECHNICAL PROGRESS REPORT
OCTOBER 2013 – DECEMBER 2013
RCRA CORRECTIVE ACTION
IND 980 700 801**

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

Prepared for: Indiana Department of Environmental
Management

Conestoga-Rovers & Associates

6520 Corporate Drive
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January 2014 • 017302 • Report No. 34



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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 October through December 2013.

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 and submission of the Refined Human Health Risk Assessment (RHHRA) and implementation of the Wastewater Treatment Plant (WWTP) Groundwater Investigation Work Plan (CRA, September 27, 2013).

On behalf of RACER Trust, CRA provided IDEM with the RHHRA (CRA, October 7, 2013) to document cleanup criteria protective of human health and the environment 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. CRA is reviewing an alternate approach to developing site-specific groundwater vapor intrusion cleanup numbers and will respond to IDEM's November 25, 2013 comments.

The initial steps of the WWTP Groundwater Investigation Work Plan (CRA, September 27, 2013) were implemented between November 5 and 14, 2013. The objective of the Work Plan was to delineate the horizontal extent of groundwater impacts upgradient of the former WWTP by:

- Installing four groundwater monitoring wells (MW93 -13 to MW 96-13) in the vicinity of MW 68, which was historically identified as the WWTP volatile organic compound (VOC) source area, to facilitate the collection of groundwater samples
- Collecting groundwater samples and static water level measurements from the newly installed monitoring wells and nearby existing monitoring wells (MW 16, MW 68, MW 84) to document groundwater quality and flow direction

Implementation of the WWTP Groundwater Investigation Work Plan included installation of groundwater monitoring wells (MW93 -13 to MW 96-13) between November 6 and 8, 2013, well development of the new monitoring wells on November 11, 2013, and collection of groundwater

samples on November 13 and 14, 2013 using low flow purge and sampling techniques. Prior to groundwater sampling, each monitoring well was purged, consisting of the removal of sufficient well volumes to allow for the stabilization of field parameters including conductivity, temperature, and turbidity and monitored natural attenuation (MNA) field parameters including dissolved oxygen, ferrous iron, oxygen reduction potential, and pH. Once field parameters were stabilized, samples were collected directly into pre-cleaned bottles provided by the laboratory for chemical analysis of Target Compound List (TCL) VOCs and MNA laboratory parameters [i.e., alkalinity (bicarbonate and carbonate), chloride, dissolved gases (ethane, ethene, methane), dissolved manganese, dissolved organic carbon, hardness, nitrate, nitrite, sulfate, sulfide, and total organic carbon]. A second round of groundwater sampling is scheduled for April 2014. Figure 1 shows the locations of the monitoring wells included in the WWTP Investigation. A summary of the findings to date is provided in Section 3.0.

The RFI activities are considered 95-percent completed.

2.2 Interim Measures

Interim Measures conducted during this reporting period include 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 2012 Annual Groundwater Monitoring Report (CRA, 2013). These IM activities were conducted between October 21 and October 29, 2013.

Interim measures are ongoing.

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.

Section 3.0 Summary of Findings

3.1 RCRA Facility Investigation/Environmental Indicators Determination

The purpose of the RHHRA report was to integrate the results of previous investigations and interim remedial measures conducted to-date and determine whether realistic exposure levels of Site constituents have the potential to adversely affect human health on- and off-Site.

The RHHRA concluded that only chromium (all forms) and vinyl chloride in on-Site and off-Site groundwater are identified as the pragmatic risk drivers likely necessitating additional risk management decisions and/or institutional controls. Since on-Site groundwater is not currently used for any purpose and will be restricted (via restrictive covenants), the area surrounding the Site is municipally serviced with potable water (local ordinances forbid installation of private wells where a water supply is available), and kiddie pools are unlikely to be filled with local groundwater (since homes are connected to municipal water), the future risk for the Site is tenable and likely within the acceptable range. This conclusion will be fortified with additional groundwater data from off-Site residential wells.

The results of the first groundwater sampling event conducted in accordance with the WWTP Investigation Work Plan indicate there are elevated concentrations of VOCs (trichloroethene, cis-1,2-dichloroethene, and trans-1,2-dichloroethene) at MW 68 and north (MW 94-13) and south (MW 93-13) of MW 68. The concentrations detected at the three wells are consistent with historically detected concentrations at MW 68. The absence of elevated concentrations of these parameters at MW 95-13, MW 96-13, MW 16, and MW 84 suggest that the South Court VOC Plume is not a source of groundwater impact to the WWTP VOC Plume. A technical memorandum will be prepared summarizing the WWTP Groundwater Investigation following a second round of groundwater sampling scheduled for April 2014.

3.2 Interim Measures

Interim groundwater and surface water monitoring and reporting is ongoing. The results of the routine Site-wide monitoring activities conducted in October 2013 will be submitted with the 2013 Annual Groundwater Monitoring Report due to IDEM on January 31, 2014.

3.3 Corrective Measures

No corrective measures activities were conducted during this reporting period.

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

On October 7, 2013, CRA, on behalf of RACER Trust, submitted the Refined Human Health Risk Assessment to IDEM.

On October 22, 2013, IDEM approved the WWTP Groundwater Investigation Work Plan (CRA, September 27, 2013).

On October 23, 2013, CRA, on behalf of RACER Trust, submitted supporting documents for the Refined Human Health Risk Assessment to IDEM.

On October 31, 2013, CRA, on behalf of RACER Trust, submitted the Quarterly Technical Progress Report for July 2013 through September 2013 to IDEM.

On October 31, 2013, CRA submitted the 2014 Draft Budget Request to RACER Trust.

On November 25, 2013, IDEM approved the Refined Human Health Risk Assessment with the exception of the non-default residential and commercial/industrial vapor intrusion groundwater screening levels.

On December 2, 2013, RACER Trust submitted the 2013 Budget Reallocation Request to IDEM.

On December 9, 2013, IDEM provided comments to CRA and RACER Trust regarding the 2013 Budget Reallocation Request.

During the reporting quarter there were multiple communications between RACER Trust and the Anderson Redevelopment Coordinator regarding potential developers for the Site, and the timetable for completion of the remedial work at the Site. IDEM participated in discussions pertaining to anticipated schedule for completing remedial efforts at the Site.

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 January through March 2014

Projected work for January through March 2014 includes the following:

- Preparation and submittal of 2013 Annual Groundwater Monitoring Report
- Respond to IDEM's comments regarding the RHHRA
- Completion of the WWTP Groundwater Investigation and report of findings
- Preparation and submittal of Environmental Restrictive Covenants
- Decommissioning of select monitoring wells
- MNA evaluation for WWTP and South Court VOC groundwater plumes

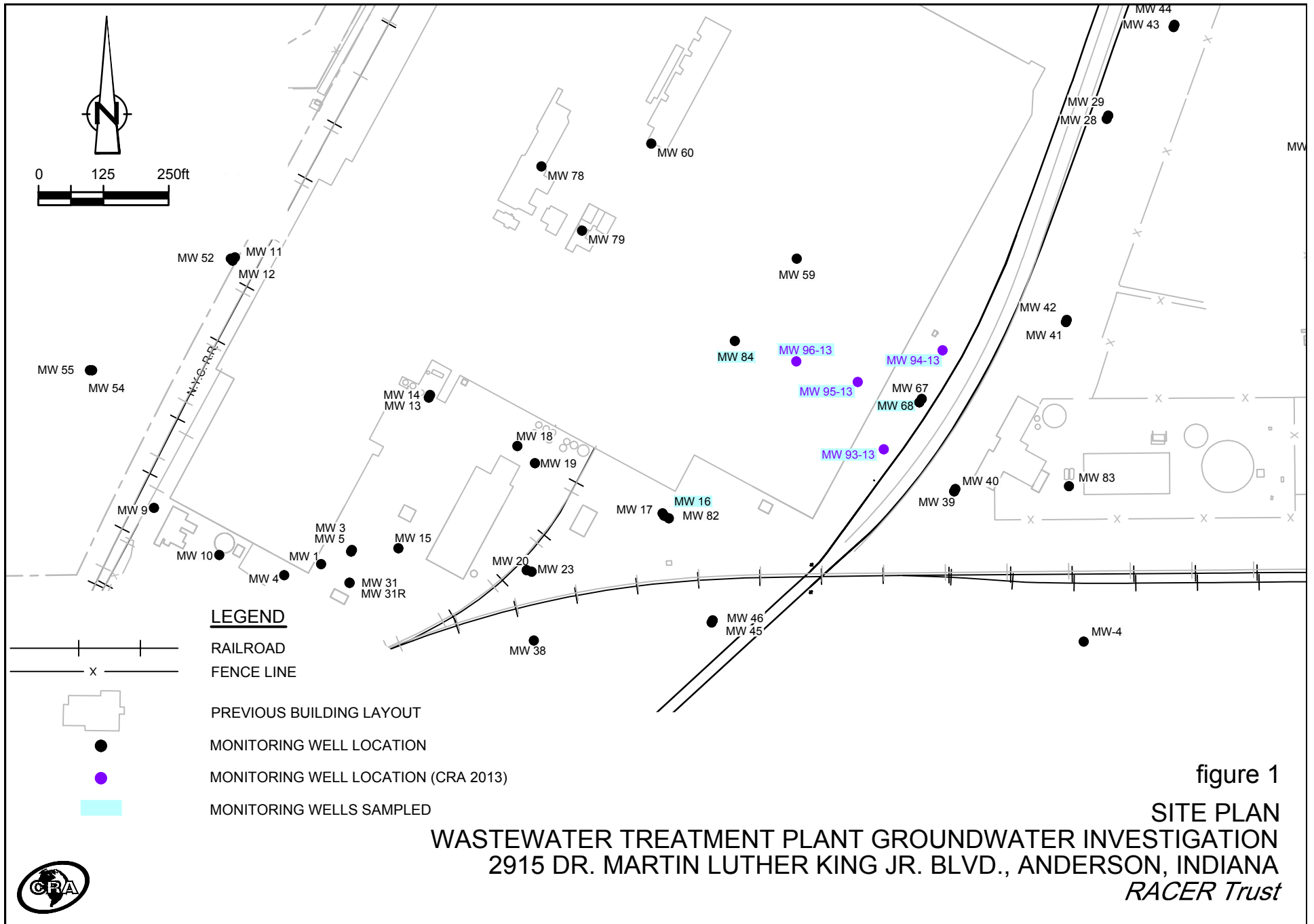
Section 10.0 Reports and Data

The Refined Human Health Risk Assessment was submitted to IDEM on October 7, 2013.

Supporting documents for the Refined Human Health Risk Assessment were submitted to IDEM October 23, 2013.

The Quarterly Technical Progress Report, July 2013 through September 2013, was submitted to IDEM on October 31, 2013.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 16 (January 2014) submitted with this Quarterly Technical Progress Report as Appendix A.



Appendix A

Fact Sheet 16 – January 2014



Revitalizing Auto Communities Environmental Response Trust

Project Fact Sheet 16 | January 2014 | 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 2012
- 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
- Waste Water 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
- Waste Water Treatment Plant Source Area Investigation Technical Memorandum, July 31, 2013
- Revised Risk Assessment Interim Deliverable, August 9, 2013
- Waste Water 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

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.

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 information repository at the local library. MLC has provided responses to IDEM comments on the Final RFI Report, the latest of which were provided to IDEM in January 2010 agreeing to conduct a vapor intrusion study at the Site.

This Study was conducted in February and March 2011, the results of which demonstrate that there is no current unacceptable risk due to vapor intrusion on Site.

Due to new Areas of Interest identified during building demolition activities, additional investigations of soil and groundwater quality were conducted in 2011, 2012, and 2013. Further investigation is scheduled for 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.

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 to address the results of activities completed since the time of the initial proposal.

UPCOMING ACTIVITIES

Investigation of recently identified AOIs is ongoing. Routine groundwater and surface water monitoring and reporting is ongoing. Design of additional Interim and Corrective Measures, as necessary, will be conducted following receipt and review of soil and groundwater investigation data and development of site specific cleanup levels.

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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