QUARTERLY TECHNICAL PROGRESS REPORT
APRIL 2011 – JUNE 2011
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

JULY 2011
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Prepared by:
Conestoga-Rovers & Associates

261 Martindale Road, Unit 3
St. Catharines, Ontario
Canada L2W 1A2

Office: (905) 682-0510
Fax: (905) 682-8818

web: http:\\www.CRAworld.com

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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 activities, and Corrective Measures (CM) at the Facility for the period of April through June 2011.

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 are related to review of analytical data generated during implementation of the Vapor Intrusion Study Work Plan and responding to the Indiana Department of Environmental Management's (IDEM's) comments on the Final RFI Report (EarthTech and ENVIRON, September 2007).

In February and March 2011, the Vapor Intrusion Study Work Plan (CRA, July 2010) was implemented at the former Plant 9 building, located at 1305 West 29th Street, Anderson, Indiana. The Vapor Intrusion Study was implemented to provide a more direct basis for assessing vapor intrusion to indoor air and to provide Site-specific data to support modification of IDEM's generic attenuation coefficients to support the Site-specific risk assessment provided in the RFI Report. The Vapor Intrusion Study included the collection and chemical analysis of groundwater, deep soil gas, sub-slab soil vapor and ambient and indoor air samples. Sample locations are presented on Figure 1. A sample key is provided in Table 1.

In response to IDEM's 13 comments on toxicity (IDEM, October 27, 2009), RACER Trust agreed to modify the Final RFI Report. Though these modifications necessitated revisions to several tables, they did not affect the risk management conclusions presented in the Final RFI Report. The revised Final RFI Report was submitted to IDEM on July 8, 2011.

The RFI activities are considered 95-percent complete.

2.2 INTERIM MEASURES

Between April 18 and April 20, 2011, semi-annual groundwater monitoring and routine surface water monitoring was completed in accordance with the Site-Wide Groundwater Monitoring Plan (AECOM, August 2010) and recommendations made in the 2010 Annual Groundwater Monitoring Program Report (AECOM, January 2011).

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, 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

In February and March 2011, the Vapor Intrusion Study Work Plan was implemented with some modification to the locations of indoor air samples, as discussed with and approved by IDEM. Sub-slab, indoor air, soil gas, and ambient air analytical data generated during implementation of the Vapor Intrusion Study Work Plan are provided in Table 2. These data were evaluated by the RACER Trust and its consultants and indicate that there is currently no unacceptable risk due to groundwater volatilization to indoor air at the former Plant 9 building. A technical memorandum presenting the field activities conducted, analytical data generated therefrom, and a discussion of the validated analytical results will be provided to IDEM under separate cover.

3.2 INTERIM MEASURES

Between April 18 and April 20, 2011, semi-annual groundwater monitoring and routine surface water monitoring was completed in accordance with the Site-Wide Groundwater Monitoring Plan and recommendations made in the 2010 Annual Groundwater Monitoring Program Report. The validated analytical data and discussion of results will be provided in the 2011 Annual Groundwater Monitoring Program Report.

A response to IDEM comments on the 2010 Annual Groundwater Monitoring Report was prepared by the RACER Trust and its consultants and submitted to IDEM on June 8, 2011.

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

In correspondence to IDEM dated January 28, 2010, MLC agreed to modify the Final RFI Report as requested in IDEM's 13 comments on toxicity criteria (IDEM, October 27, 2009). The revised Final RFI Report was submitted to IDEM on July 8, 2011. Though these modifications necessitated revisions to several tables, they did not affect the risk management conclusions presented in the Final RFI Report. The revised Final RFI Report was submitted to IDEM on July 8, 2011.

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

On April 21, 2011, RACER Trust received IDEM's comments on the 2010 Annual Groundwater Monitoring Report (AECOM, January 2011), which summarized the groundwater and surface water monitoring activities performed in 2010. A response to IDEM comments was prepared by the RACER Trust and its consultants and submitted to IDEM on June 8, 2011. IDEM completed its review of RACER Trust's responses to IDEM's April 21, 2011 comments, as documented in IDEM's July 5, 2011 letter to Mr. Robert Hare.

Representatives of IDEM and RACER Trust met on June 28, 2011 to discuss the activities proposed downgradient of the South Court Area. These activities include the installation and sampling of a shallow groundwater monitoring well downgradient of MW49 to assess the potential for an unacceptable risk due to vapor intrusion in nearby residences. IDEM and RACER Trust agreed that the placement of the monitoring well in close proximity to the nearest residence would be preferred.

On July 7, 2011, CRA submitted an Investigation Work Plan to IDEM on behalf of RACER Trust for additional investigations as outlined below:

- Delineation of the extent of chromium impacted soil and perched groundwater in the vicinity of former Bay M26/M27
- Delineation of the horizontal and vertical extent of nine areas of yellow stained soil identified during building demolition activities
- General surface soil screening in the northern portion of the former main manufacturing building

6.0 SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS

No problems were encountered during the reporting period, however, a storm sewer line that was believed to have been punctured during implementation of the Vapor Intrusion Study Work Plan on February 3, 2011 remained unrepaired until June 2011.

7.0 ACTIONS TAKEN TO RECTIFY PROBLEMS

On June 2, 2011, repairs to the former Plant 9 storm sewer line that was believed to have been damaged when drilling activities commenced on February 3, 2011 was exposed to reveal that no damage had occurred. Prior to excavating the floor slab, a tape was advanced in the borehole to confirm the void in the line and the anticipated depth of excavation. However, when the utility was exposed, the sewer was found in tact. It appears the drilling rods only "nicked" the side of the sewer. It is likely that the void observed during drilling is a result of poor recovery as the sampler was driven along the side of the utility. The floor slab was reinstalled on June 3, 2011.

8.0 CHANGES IN PERSONNEL

Effective April 1, 2011, Mr. James McGuigan replaced Mr. Gregory Carli as CRA's Project Director for the Site. Mr. McGuigan's contact information is provided below:

James J. McGuigan, P.E.
Conestoga-Rovers & Associates Inc.
8615 W. Bryn Mawr Avenue
Chicago, IL 60631
United States
Phone: (773) 380-9933 x1155
Fax: (773) 380-6421
Email: jmcguigan@craworld.com

Effective July 5, 2011, the RACER Trust moved its offices from Birmingham, Michigan to Ypsilanti, Michigan. The new contact information is provided below:

RACER Trust
2930 Ecorse Road
Ypsilanti, MI 48198
United States

9.0 PROJECTED WORK FOR JULY THROUGH SEPTEMBER 2011

Projected work for July through September 2011 includes the following:

- Completion of the Additional Investigations field activities as summarized in the July 7, 2011 Investigation Work Plan
- Completion of surface water sampling in August 2011 in accordance with the Site-Wide Groundwater Monitoring Plan
- Preparation of the Vapor Intrusion Study Technical Memorandum
- Preparation of a work plan for additional monitoring well installation and groundwater sampling downgradient of the South Court Area

10.0 REPORTS AND DATA

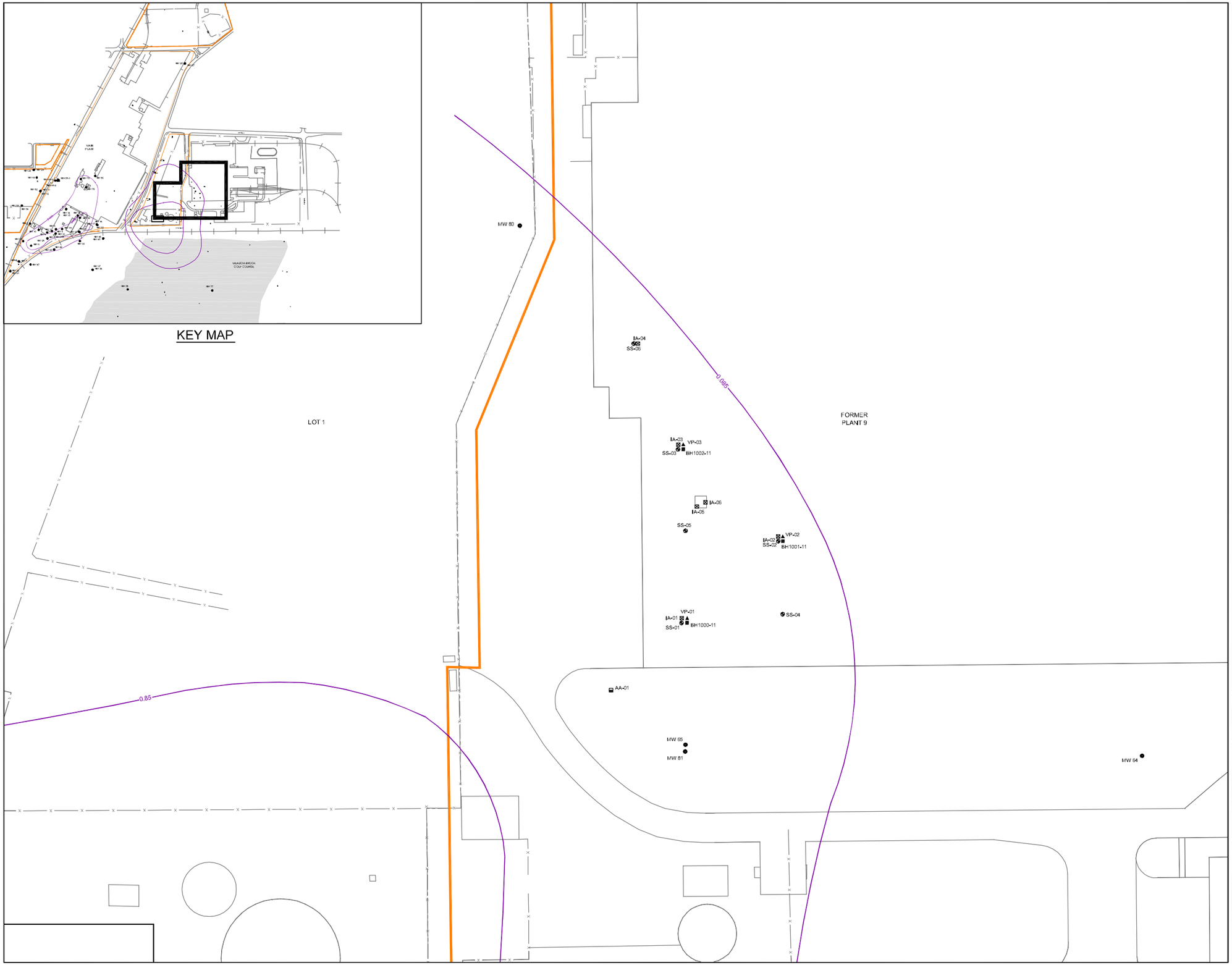
The Quarterly Technical Progress Report, January 2011 through March 2011, was submitted to IDEM on April 29, 2011.

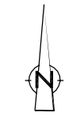
A response to IDEM comments on the 2010 Annual Groundwater Monitoring Report was submitted to IDEM on June 8, 2011.

The revised Final RFI Report was submitted to IDEM on July 7, 2011.

An update of the RCRA Corrective Action activities completed at the Facility is presented in Project Fact Sheet 11 (July 2011) submitted with this Quarterly Technical Progress Report as Appendix A.

KEY MAP





0 20 40ft

LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- LOT LINE
- RAILROAD
- FENCE LINE
- BUILDING
- 100 YEAR FLOODPLAIN
- INTERPOLATED VINYL CHLORIDE ISOCONCENTRATION CONTOUR (mg/L) (APRIL 2009)
- MW62 MONITORING WELL LOCATION
- BH1000-11 BOREHOLE LOCATION
- SS-01 SUB SLAB VAPOR PROBE
- VP-01 DEEP SOIL VAPOR PROBE
- AA-01 OUTDOOR AIR SAMPLE LOCATION
- IA-01 INDOOR AIR SAMPLE LOCATION

NOTES:
1. 100 YEAR FLOODPLAIN FEMA FLOOD INSURANCE RATE MAP, CITY OF ANDERSON, INDIANA, MADISON COUNTY, PANELS 4 AND 5 OF 5, REVISED NOVEMBER 24, 1993.
2. ISOCONCENTRATIONS REPRESENT THE APRIL 2009 GROUNDWATER ANALYTICAL RESULTS.

SCALE VERIFICATION

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

VAPOR INTRUSION STUDY SAMPLE LOCATIONS

QUARTERLY TECHNICAL PROGRESS REPORT

2915 DR. MARTIN LUTHER KING JR. BLVD
ANDERSON, IN

CONESTOGA-ROVERS & ASSOCIATES

Source Reference:			
Project Manager: JM	Reviewed By: SR	Date: JULY 2011	
Scale: 1"=40'	Project No.: 017302-T02	Report No.: 020	Drawing No.: 1

017302-T02(020)GN-SC001 JUL 13/2011

TABLE 1

VAPOR INTRUSION STUDY SAMPLE KEY
QUARTERLY TECHNICAL PROGRESS REPORT APRIL 2011 - JUNE 2011
2915 DR. MARTIN LUTHER KING JR. BOULEVARD
ANDERSON, INDIANA

Sample Identification	*Sample Location*	*Sample Date*	*Sample Type*	*1,1-DCA*	*cis-1,2-DCE*	*trans-1,2-DCE*	*1,2,4-TCB*	*1,1,1-TCA*	*TCE*	*Vinyl Chloride*
GS-017302-030411-NH-001	VP-01	03/04/11	Soil Gas	X	X	X	X	X	X	X
GS-017302-030411-NH-002	VP-02	03/04/11	Soil Gas	X	X	X	X	X	X	X
GS-017302-030411-NH-003	VP-03	03/04/11	Soil Gas	X	X	X	X	X	X	X
GU-017302-030411-NH-001	SS-01	03/04/11	Sub-Slab	X	X	X	X	X	X	X
GU-017302-030411-NH-002	SS-02	03/04/11	Sub-Slab	X	X	X	X	X	X	X
GU-017302-030411-NH-003	SS-03	03/04/11	Sub-Slab	X	X	X	X	X	X	X
GU-017302-030411-NH-004	SS-04	03/04/11	Sub-Slab	X	X	X	X	X	X	X
GU-017302-030411-NH-005	SS-05	03/04/11	Sub-Slab	X	X	X	X	X	X	X
GU-017302-030411-NH-006	SS-06	03/04/11	Sub-Slab	X	X	X	X	X	X	X
IA-017302-030411-NH-001	IA-01	03/04/11	Indoor Air	X	X	X	X	X	X	X
IA-017302-030411-NH-002	IA-02	03/04/11	Indoor Air	X	X	X	X	X	X	X
IA-017302-030411-NH-003	IA-03	03/04/11	Indoor Air	X	X	X	X	X	X	X
IA-017302-030411-NH-004	IA-04	03/04/11	Indoor Air	X	X	X	X	X	X	X
IA-017302-030411-NH-005	IA-05	03/04/11	Indoor Air	X	X	X	X	X	X	X
IA-017302-030411-NH-006	IA-06	03/04/11	Indoor Air	X	X	X	X	X	X	X
AA-017302-030411-NH-001	AA-01	03/04/11	Ambient Air	X	X	X	X	X	X	X
TB-017302-030411-NH-001	-	03/04/11	Trip Blank	X	X	X	X	X	X	X

TABLE 2

VAPOR INTRUSION STUDY ANALYTICAL DATA
QUARTERLY TECHNICAL PROGRESS REPORT APRIL 2011 - JUNE 2011
2915 DR. MARTIN LUTHER KING JR. BOULEVARD
ANDERSON, INDIANA

Sample ID:		*GS-017302-030411-NH-001*	*GS-017302-030411-NH-002*	*GS-017302-030411-NH-003*
Sample Location:		*VP-01*	*VP-02*	*VP-03*
Sample Date:		*03/04/11*	*03/04/11*	*03/04/11*
Sample Type:	*Units*	*Soil Gas*	*Soil Gas*	*Soil Gas*
Volatile Organic Compounds				
1,1-Dichloroethane	µg/m^3	210	9.9	170
cis-1,2-Dichloroethene	µg/m^3	1000	9.9	550
trans-1,2-Dichloroethene	µg/m^3	360	7.9 U	230
1,2,4-Trichlorobenzene	µg/m^3	37 U	37 U	37 U
1,1,1-Trichloroethane	µg/m^3	41	82	1700
Trichloroethene	µg/m^3	11 U	11 U	11 U
Vinyl Chloride	µg/m^3	10 U	10 U	10 U

Notes:
µg/m^3 - micrograms per cubic meter
U - not detected above associated value

TABLE 2

VAPOR INTRUSION STUDY ANALYTICAL DATA
QUARTERLY TECHNICAL PROGRESS REPORT APRIL 2011 - JUNE 2011
2915 DR. MARTIN LUTHER KING JR. BOULEVARD
ANDERSON, INDIANA

Sample ID:		*GU-017302-030411-NH-001*	*GU-017302-030411-NH-002*	*GU-017302-030411-NH-003*
Sample Location:		*SS-01*	*SS-02*	*SS-03*
Sample Date:		*03/04/11*	*03/04/11*	*03/04/11*
Sample Type:	*Units*	*Sub-Slab*	*Sub-Slab*	*Sub-Slab*
Volatile Organic Compounds				
1,1-Dichloroethane	µg/m^3	8.1 U	300	15
cis-1,2-Dichloroethene	µg/m^3	7.9 U	7.9 U	11
trans-1,2-Dichloroethene	µg/m^3	7.9 U	7.9 U	7.9 U
1,2,4-Trichlorobenzene	µg/m^3	37 U	37 U	37 U
1,1,1-Trichloroethane	µg/m^3	12	570	1900
Trichloroethene	µg/m^3	11 U	11 U	11 U
Vinyl Chloride	µg/m^3	10 U	10 U	10 U

Notes:
µg/m^3 - micrograms per cubic meter
U - not detected above associated value

TABLE 2

VAPOR INTRUSION STUDY ANALYTICAL DATA
QUARTERLY TECHNICAL PROGRESS REPORT APRIL 2011 - JUNE 2011
2915 DR. MARTIN LUTHER KING JR. BOULEVARD
ANDERSON, INDIANA

Sample ID:		*GU-017302-030411-NH-004*	*GU-017302-030411-NH-005*	*GU-017302-030411-NH-006*
Sample Location:		*SS-04*	*SS-05*	*SS-06*
Sample Date:		*03/04/11*	*03/04/11*	*03/04/11*
Sample Type:	*Units*	*Sub-Slab*	*Sub-Slab*	*Sub-Slab*
Volatile Organic Compounds				
1,1-Dichloroethane	µg/m^3	8.1 U	8.1 U	8.1 U
cis-1,2-Dichloroethene	µg/m^3	7.9 U	7.9 U	7.9 U
trans-1,2-Dichloroethene	µg/m^3	7.9 U	27	7.9 U
1,2,4-Trichlorobenzene	µg/m^3	37 U	37 U	37 U
1,1,1-Trichloroethane	µg/m^3	31	15	32
Trichloroethene	µg/m^3	11 U	11 U	11 U
Vinyl Chloride	µg/m^3	10 U	10 U	10 U

Notes:
µg/m^3 - micrograms per cubic meter
U - not detected above associated value

TABLE 2

VAPOR INTRUSION STUDY ANALYTICAL DATA
QUARTERLY TECHNICAL PROGRESS REPORT APRIL 2011 - JUNE 2011
2915 DR. MARTIN LUTHER KING JR. BOULEVARD
ANDERSON, INDIANA

Sample ID:		*IA-017302-030411-NH-001*	*IA-017302-030411-NH-002*	*IA-017302-030411-NH-003*
Sample Location:		*IA-01*	*IA-02*	*IA-03*
Sample Date:		*03/04/11*	*03/04/11*	*03/04/11*
Sample Type:	*Units*	*Indoor Air*	*Indoor Air*	*Indoor Air*
Volatile Organic Compounds				
1,1-Dichloroethane	µg/m^3	1.2 U	1.2 U	1.2 U
cis-1,2-Dichloroethene	µg/m^3	0.79 U	0.79 U	0.79 U
trans-1,2-Dichloroethene	µg/m^3	0.79 U	0.79 U	0.79 U
1,2,4-Trichlorobenzene	µg/m^3	12 U	12 U	12 U
1,1,1-Trichloroethane	µg/m^3	1.6 U	1.6 U	1.6 U
Trichloroethene	µg/m^3	2.1 U	2.1 U	2.1 U
Vinyl Chloride	µg/m^3	0.51 U	0.51 U	0.51 U

Notes:
µg/m^3 - micrograms per cubic meter
U - not detected above associated value

TABLE 2

VAPOR INTRUSION STUDY ANALYTICAL DATA
QUARTERLY TECHNICAL PROGRESS REPORT APRIL 2011 - JUNE 2011
2915 DR. MARTIN LUTHER KING JR. BOULEVARD
ANDERSON, INDIANA

Sample ID:		*IA-017302-030411-NH-004*	*IA-017302-030411-NH-005*	*IA-017302-030411-NH-006*
Sample Location:		*IA-04*	*IA-05*	*IA-06*
Sample Date:		*03/04/11*	*03/04/11*	*03/04/11*
Sample Type:	*Units*	*Indoor Air*	*Indoor Air*	*Indoor Air*
Volatile Organic Compounds				
1,1-Dichloroethane	µg/m^3	1.2 U	1.2 U	1.2 U
cis-1,2-Dichloroethene	µg/m^3	0.91	0.79 U	0.79 U
trans-1,2-Dichloroethene	µg/m^3	0.79 U	0.79 U	0.79 U
1,2,4-Trichlorobenzene	µg/m^3	12 U	12 U	12 U
1,1,1-Trichloroethane	µg/m^3	1.6 U	1.6 U	1.6 U
Trichloroethene	µg/m^3	2.1 U	2.1 U	2.1 U
Vinyl Chloride	µg/m^3	0.51 U	0.51 U	0.51 U

Notes:
µg/m^3 - micrograms per cubic meter
U - not detected above associated value

TABLE 2

VAPOR INTRUSION STUDY ANALYTICAL DATA
QUARTERLY TECHNICAL PROGRESS REPORT APRIL 2011 - JUNE 2011
2915 DR. MARTIN LUTHER KING JR. BOULEVARD
ANDERSON, INDIANA

Sample ID:		*AA-017302-030411-NH-001*	*TB-017302-030411-NH-001*
Sample Location:		*AA-01*	*--*
Sample Date:		*03/04/11*	*03/04/11*
Sample Type:	*Units*	*Ambient Air*	*Trip Blank*
Volatile Organic Compounds			
1,1-Dichloroethane	µg/m^3	1.2 U	1.2 U
cis-1,2-Dichloroethene	µg/m^3	0.79 U	0.79 U
trans-1,2-Dichloroethene	µg/m^3	0.79 U	0.79 U
1,2,4-Trichlorobenzene	µg/m^3	12 U	12 U
1,1,1-Trichloroethane	µg/m^3	1.6 U	1.6 U
Trichloroethene	µg/m^3	2.1 U	2.1 U
Vinyl Chloride	µg/m^3	0.51 U	0.51 U

Notes:
µg/m^3 - micrograms per cubic meter
U - not detected above associated value

APPENDIX A

FACT SHEET 11 – JULY 2011

RCRA CORRECTIVE ACTION
REVITALIZING AUTO COMMUNITIES ENVIRONMENTAL RESPONSE TRUST
2915 Dr. Martin Luther King Jr. Boulevard
(Formerly Pendleton Avenue) 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 2005:

- Interim Measures Work Plan for South Court Area, March 21, 2005
- RCRA Facility Investigation Stage II Data Report, March 30, 2005
- RCRA Facility Investigation Report, August 12, 2005
- Documentation of Environmental Indicators Determination, September 20, 2005
- Interim Site-Wide Groundwater Monitoring Plan, September 20, 2005
- Interim Measure Work Plan - Production Well Abandoment, July 27, 2006
- 2006 Annual Groundwater Monitoring Report, January 31, 2007
- 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
- 2007 Annual Groundwater Monitoring Report, January 31, 2008
- 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 covering February 1998 through September 2009
- 2008 Annual Groundwater Monitoring Report, February 2009
- 2009 Annual Groundwater Monitoring Report, July 2010
- Vapor Intrusion Study Work Plan, July 2010

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.

In February and March 2011, the Vapor Intrusion Study Work Plan at the former Plant 9 building was completed. Field activities included advancing three boreholes to the depth of the groundwater table to facilitate the collection of groundwater grab samples in the southwest corner of building. The groundwater grab sample results indicate detectable concentrations of select volatile organic compounds (VOCs) below IDEM's 2006 draft industrial groundwater vapor intrusion screening criteria. At IDEM's request, sub-slab vapor, deep soil gas, indoor air, and ambient air sampling was conducted, the results of which demonstrate that there is currently no unacceptable risk due to groundwater volatilization to indoor air at former Plant 9.

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 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.

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 sampling conducted in December 2004 identified that the TCE concentrations were highest in an area of approximately 20 x 35-feet.

Soil was excavated from the 20 x 35-foot area, to the depth of the perched water table at approximately 8 feet below ground. The soil was temporarily staged in rolloff boxes during excavation and then disposed of 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

Routine groundwater monitoring and reporting is ongoing. Additional focused soil and perched groundwater investigations are tentatively scheduled for the third quarter of 2011.

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

IDEM

Robert Marshall
Tel: (317) 232-4534
Toll free: (800) 451-6027

RACER Trust

Robert (Bob) Hare
Tel: (313) 486-2908