

U.S. EPA STATEMENT OF BASIS

for

Proposed Industrial and Commercial Reuse

at

The Former Allison Transmission Plant 2

4500 West Gilman Street

Speedway, Indiana

IND 000 806 828

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Statement of Basis

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EPA I.D. Number IND 000 806 828

INTRODUCTION

This Statement of Basis (SB) for the former Allison Transmission Plant 2, owned by the Speedway Redevelopment Commission (SRC) explains the Environmental Protection Agency's (EPA's) proposal to take no further action at the site and to release the parcel for commercial and industrial redevelopment. EPA will make a final decision on this parcel only after the public comment period has ended and the information submitted during this time has been reviewed and considered. As such, EPA is issuing this SB as part of its public participation responsibilities under the Resource Conservation and Recovery Act (RCRA).

This document summarizes information that can be found in greater detail in the following documents: Description of Current Conditions, dated February 8, 2005; the RCRA Facility Investigation (RFI) Report (and Risk Assessment), dated March 31, 2009; the RCRA Corrective Action Corrective Measures Proposal, dated December 12, 2011; the RCRA Corrective Measures Proposal, Former Allison Transmission Plant 2, dated April 12, 2013, and other documents contained in the administrative record for the Allison Transmission facility.

EPA notes that the descriptions, investigation results, conclusions drawn and proposed decision presented in this SB do not pertain to the active Allison Transmission facility (Plants 3, 6, 7, 12 and 14), which is located immediately south of the former Plant 2, at 4700 West 10th Street, Speedway, Indiana (Figure 1). This active facility is under a different ownership and has a separate EPA I.D. Number (IND 006 413 348) and to allow for release of the Plant 2 property this active facility is being considered separately. EPA will evaluate and render a decision for the active facility at a later date.

EPA may modify this proposed decision or make another decision based on new information or public comments. Therefore, the public is encouraged to review and comment on this decision. The public can be involved in this process by reviewing the documents contained in the administrative record file and by submitting comments to EPA during the public comment period set for \_\_\_\_\_, to \_\_\_\_\_, 2014.

#### PROPOSED REMEDY

EPA proposes no further remediation for the former Plant 2 parcel, that the existing ground water monitoring continue and institutional controls previously established remain in place.. Future land use for residential or agricultural purposes will not be allowed under this determination. If a change in types of land use is proposed, EPA must be consulted, and a corresponding change in remedy would be required.

The soil of the former Plant 2 parcel was impacted by industrial contaminants, known under the RCRA program as hazardous constituents. These contaminants include semivolatile organic compounds (SVOCs), petroleum products and metals. However, this contamination has been removed to concentrations which present a cumulative site-related cancer risk (CSCR) of  $1 \times 10^{-4}$  (i.e., one in 10,000) and a non-cancer hazard index (HI) of less than 1. Approximately 3,198 tons of contaminated soil were removed to meet these cleanup criteria. A summary of the hazardous constituents and their concentrations is presented below under the Interim Measures Taken section.

Localized areas of contamination (SVOCs, chlorinated volatile organic compounds (VOCs) and metals) have been detected in soil and ground water at the former Plant 2 parcel. However, sampling and analysis of the ground water indicates that concentrations of the hazardous constituents decrease to non-detect within one hundred feet from the points of detection. Future mobilization of hazardous constituents is expected to be minimal because soil contaminated by the hazardous constituents above screening criteria listed below in this SB was removed, and because the parcel has been exposed to precipitation since the Plant 2 structures were removed in 2004 and no increases of contaminant concentrations have been observed. Nonetheless, General Motors, LLC (GM) will continue to monitor the ground water at the downgradient (southern) margin of the Plant 2 parcel and GM will perform further investigation and possible corrective action if contamination is detected above screening criteria at this boundary.

Area-wide ground water monitoring indicates that there are one or more off-site sources of chlorinated VOC contamination, to the immediate north, which is migrating onto the former Plant 2 parcel, and is migrating off-site beyond the southern property boundary. The Indiana Department of Environmental Management (IDEM) is investigating this source area.

For the former Plant 2 parcel, EPA has determined that, given the existing conditions, the potential risk of indoor vapor intrusion from the hazardous constituents is low and acceptable for commercial/industrial reuse of the property.

Restrictive covenants have been placed on the property deed which ensure that: (1) all future structures on the parcel will be evaluated for vapor intrusion and/or will be equipped with vapor mitigation systems; (2) the property will not be used for residential or agricultural purposes; (3) any excavated soils will be managed safely to prevent exposure to contaminants; (4) ground water will not be used for any potable purpose; (5) no activity on the property will interfere with the ground water monitoring network; (6) a crushed rock barrier over an area of buried demolition debris will be maintained; (7) EPA, IDEM and General Motors shall have access rights for purposes of corrective action, and (8) these restrictive covenants for the property are permanent, i.e., to “run with the land”.

## FACILITY BACKGROUND

### Location and Manufacturing History

The former Allison Transmission Plant 2 is located on an approximately 20 acre parcel of land at 4500 West Gilman Street, Speedway, Indiana (Figure 1). The original portion of Plant 2 was constructed in 1936. The Allison Transmission (AT) Division of General Motors Corporation (GMC) conducted various operations at the site including aircraft engine testing, machining of metal parts, parts cleaning, and warehousing. These operations are known to involve plating, degreasing, and generation of metal cuttings. Renovations and expansions of the facility occurred over subsequent years. Wastes that were generated included metal and cyanide wastes from plating operations, spent chlorinated VOCs from degreasing, petroleum wastes (e.g., cutting oils, transmission fluid and fuels), coolants, metal chips and general refuse. Plant 2 was designated as a Large Quantity Generator by EPA. Manufacturing at the facility was phased out in the mid-1990’s. Most structures on the site were demolished in 2004. Currently, a fire control pump house, an above ground water tank and a power substation are the only structures remaining on site.

The former Plant 2 parcel is bounded by industrial property to the north; a former railroad right-of-way, industrial property and 10th Street to the south; Main Street to the west (beyond which are commercial/retail facilities and residences); and a railroad right-of-way, industrial property and lime piles, Polco Street, and Dry Run Creek to the east (Figure 1). Residential properties are located within one quarter mile to the west of the Plant 2 parcel.

On April 27, 2005, EPA and GMC entered into a Performance Based Corrective Action Agreement (PBCAA) addressing the entire AT facility, to investigate and remediate releases of hazardous wastes and constituents. In order to facilitate redevelopment of the former Plant 2 parcel, EPA proposes to address this parcel separately from any future actions proposed for the active Allison Transmission facility and its constituent plants.

In August 2007, GM sold the entire facility to the Clutch Operating Company, which retained the name Allison Transmission. On March 4, 2011, the Clutch Operating Company sold the former Plant 2 parcel to the Speedway Redevelopment Commission (SRC). Under the terms of the property transfer, GM will oversee the completion of RCRA corrective action obligations at the facility.

### Site Geology and Hydrogeology

The area of the former Plant 2 parcel is relatively flat and slopes gently to the southwest. Underlying soil is primarily sand and gravel with intermittent beds of silt and clay, approximately 140 feet thick, overlying shale bedrock. The water table is 25 to 30 feet below ground surface. Ground water flow is primarily to the south, toward Plant 3.

### Ecological Setting

The former Plant 2 parcel is a flat vacant property with an extensive history of industrial use. It is bounded by parking lots, heavy to light industrial/commercial properties, lime sludge piles and thoroughfares. No ecologically significant habitat exists at or around the parcel.

### Interim Measures Taken

During the decommissioning of Plant 2, GM voluntarily removed industrial wastes and waste management units from the site, in order to reduce potential human exposure to hazardous constituents to levels suitable for industrial/commercial reuse of the property. In 2009, GM excavated soil contaminated with mercury above screening levels at underground storage tank (UST) Area A. Approximately