RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS
October 2019

General Motors, LLC
Marion Metal Center
2400 West 2nd Street
Marion, Indiana
U.S. EPA ID. IND 000715086

I. INTRODUCTION

Under the Resource Conservation and Recovery Act (RCRA), all permitted and interim status hazardous waste treatment, storage, or disposal facilities are required to conduct corrective action for any releases of hazardous waste or hazardous constituents at or from their facilities.

This Statement of Basis is issued by the Indiana Department of Environmental Management (IDEM), regarding General Motors, LLC, Marion Metal Center, 2400 West 2nd Street, Marion, Indiana 46953. IDEM has determined that no further RCRA corrective action is necessary for any of the identified Solid Waste Management Units (SWMUs) or Areas of Concern (AOCs) at this facility.

IDEM is issuing this Statement of Basis as part of its public participation responsibilities under RCRA Corrective Action Program guidance, and is using the administrative procedures found in 40 CFR Part 270, as adopted by reference, to provide public notice and solicit comment. The public notice period is hereby announced and will continue for 30 days from the published date of the Public Notice in the Chronicle-Tribune. If requested, a public hearing may be held to accept comments.

This Statement of Basis summarizes information found in greater detail in the work plans, reports, or other documents in this facility’s administrative record which can be accessed via IDEM’s Virtual File Cabinet (VFC). IDEM encourages the public to review these documents in order to gain a more comprehensive understanding of the facility and the activities that have been conducted under RCRA authority. IDEM may modify this corrective action determination or select another remedy based on public comments or new information obtained.
This determination will complete the corrective action process under the RCRA Corrective Action Program for this facility. The facility must continue to comply with all applicable parts of RCRA.

II. **FACILITY BACKGROUND**

GM began construction of this facility in 1955 and the metal fabricating operations started in 1956. Automobile parts are manufactured from steel coils shipped to the facility. The steel is unrolled, stamped, assembled, and welded into automobile body components. The finished products include roofs, door assemblies, engine hoods, quarter panels, floor assemblies, fenders, and metal blanks. Foam headrests were once manufactured at this facility. This facility is located on 187 acres and includes 2.7 million square feet of manufacturing and office space.

GM submitted a RCRA Part A Permit Application to the U. S. EPA on November 19, 1980 (VFC # 69128142). The facility was identified as GMC-Fisher Body Division Marion on the Part A. The Part A listed the following waste codes and quantities: F001, 225 tons/year; F010, 6,000 pounds/year; F003, 9,555 pounds/year; U223, 1,600 pounds/year; and F017, 7,500 pounds/year.

On December 3, 1987, the facility indicated all hazardous were being stored for less than 90 days. Closure certification of the Former Hazardous Waste Storage Area (SWMU 1) was accepted on June 6, 1989 (VFC # 69128139).

GM is presently classified as a small quantity generator.

III. **SITE ASSESSMENT**

IDEM conducted a site visit on November 13, 2013, to evaluate the facility for SWMUs and AOCs that required additional scrutiny. During this visit, the following SWMUs and AOCs were evaluated:

<table>
<thead>
<tr>
<th>Unit Name</th>
<th>IDEM Determination</th>
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<tbody>
<tr>
<td>SWMU 1 Former Container Storage Area</td>
<td>No Further Action (NFA)</td>
</tr>
<tr>
<td>SWMU 2 Current Container Storage Area</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 3 Satellite Accumulation Area</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 4 Current Wastewater Treatment Unit</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 5 Former Wastewater Treatment Unit</td>
<td>NFA</td>
</tr>
<tr>
<td>SWMU 6 Lagoon</td>
<td>Further Investigation of the Ground Water</td>
</tr>
<tr>
<td>SWMU 7 Former Landfill</td>
<td>Further Investigation of the soils</td>
</tr>
<tr>
<td>SWMU 8 Coal Ash Silo</td>
<td>NFA</td>
</tr>
</tbody>
</table>
SWMU 9  Drum Marshalling Area    NFA
SWMU 10  Universal Waste Area    NFA
(Nonhazardous Waste Accumulation Area)
SWMU 11  Turnings and Borings Roll-Off Box    NFA
AOC 1   Oil Crib    NFA
AOC 2  Powerhouse (Coal yard)    GM indicated the soils under and adjacent to the coal pile had been sampled. IDEM requested to review this data.
AOC 3  Gasoline and Diesel USTs    NFA
AOC 4  Used Oil Storage Tanks    NFA
AOC 5  Scrap Metal Bale Area    GM indicated the gravel and soil in this area had been sampled. IDEM requested to review this data.

None of the SWMUs or AOCs showed evidence of an existing release. Further information is available in the RCRA Facility Assessment (Addendum) (VFC # 80010234).

IV. SUMMARY OF THE CORRECTIVE ACTION DETERMINATION

Based on the administrative record, IDEM is proposing no further action for all of the identified SWMUs and AOCs. IDEM is proposing that a Corrective Action Complete With Controls determination be issued for the General Motors, LLC Marion Metal Center facility. “With Controls” means that General Motors, LLC, recorded an Environmental Restrictive Covenant (ERC) (VFC # 82841500) prohibiting residential and agricultural use of the property, prohibiting intrusive activity, and prohibiting the extraction of ground water.

V. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination, particularly if you are aware of spills and/or releases that have occurred at this facility in the past. If requested, IDEM may hold a public hearing to discuss any remedial actions the public proposes. IDEM will publish a newspaper notice of the hearing 30 days in advance.
The Public Notice and the administrative record are available for review on IDEM’s Virtual File Cabinet, which is found at: www.IN.gov/idem (select “Online Services”). VFC document numbers are provided in Section VI. for the primary documents IDEM used to support this decision.

After considering any comments received, IDEM will summarize the comments and its responses to the comments, and announce its decision in a Final Decision/Response to Comments document. This document will be incorporated into the administrative record. To send written comments or obtain further information, contact:

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VI. REFERENCES

Environmental Restrictive Covenant, dated August 21, 2019 (VFC # 82841498)

RCRA Facility Investigation Report, dated April 1, 2019 (VFC # 82737939)

RCRA Facility Investigation Report Proposed Path to Closure, dated January 1, 2019 (VFC 82677827)

RCRA Facility Investigation Report (RFI), dated December 21, 2018 (VFC # 82607091)

RCRA Facility Investigation Quarterly Monitoring Report, dated June 6, 2018 (VFC # 82566666)

GM’s Response to, IDEM’s 2017 Comments on the RFI Stage II Monitoring Report, dated May 30, 2018 (VFC # 82550599)

RCRA Facility Investigation Quarterly Monitoring Report, dated January 12, 2018 (VFC # 80593405)

RCRA Facility Investigation Report Stage II, dated October 10, 2018 (VFC # 80542670)

RCRA Facility Investigation Quarterly Monitoring Report, dated October 17, 2017 (VFC # 80544951)
RCRA Facility Investigation Report Stage II, dated July 19, 2107 (VFC # 80493144)

RCRA Facility Investigation Report Stage II, dated December 7, 2016 (VFC # 80388838)

RCRA Facility Investigation Report Stage II, dated November 3, 2016 (VFC # 80374404)

RCRA Facility Investigation Report Stage II, dated July 28, 2016 (VFC # 803229073)

RCRA Proposed Path to Closure, dated July 18, 2016 (VFC # 80325419)

RCRA Facility Assessment Report, dated February 5, 2015 (VFC # 80010234)