

June 2005

General Motors Corporation (GM)

2122 Broening Highway
Baltimore, Maryland 21224

Site Location

General Motors Corporation North American Truck Group Baltimore Assembly Plant (GM) is a 185-acre facility located at 2122 Broening Highway, Baltimore, MD 21224.

Site History

- The plant began operations in 1935 and officially ceased production on Friday, May 13, 2005.
- The facility's primary business was the assembly of minivans.
- The company generated various hazardous wastes from the use of paints, solvents, sealers, adhesives, vehicle fluids and from competent part incineration and sewage treatment.
- There is historic contamination associated with the site, as described below.

Environmental Permits

- Oil Operations Permit – covers 17 aboveground storage systems with approximately 597,000 gallons of storage. Two of the tanks hold 250,000-gallons of #2 heating oil. The permit is due to expire on August 2, 2005.
- Hazardous Waste Permit – authorizes GM to store hazardous wastes generated on-site for periods longer than 90 days prior to shipment off-site for disposal. Although the permit expired in February 2004, GM submitted a timely application to renew and the conditions of the expired permit remain in effect. This permit requires closure actions be taken when the permit is terminated.
- NPDES Water Discharge Permit -- covers stormwater run-off and non-process wastewater from various sources such as fire control systems, condensate, and water fountains. The permit is in effect through 2008. There are no outstanding or historic issues regarding water discharge at the site.
- GM held several air pollution permits that allowed the company to install and operate equipment specific to their auto assembly operations. Except for operation of the buildings' boilers (for which existing permits could be transferred), new permits would be required for any operations that produce regulated air emissions.
- Under current air permits, GM operates one incinerator and one boiler. The incinerator is processing waste paper and wooden pallets and is not expected to operate beyond January

31, 2006. The boiler heats the buildings, and GM has informed MDE that it does not expect operate the boiler past September 2005.

- GM holds a radioactive materials license to possess and use a lead paint analyzer. GM has been in contact with MDE to discuss their future plans for the device. The company will either send the device back to the manufacturer or to another GM plant, at which time the Maryland license will be terminated.

Environmental Investigations and Actions

- An investigation of contaminated groundwater began in 1990 after the closure of two underground storage tanks (USTs).
- The investigation identified the presence of: benzene, toluene, ethylbenzene, xylene (BTEX); methyl isobutyl ketone (MIBK); and chlorinated volatile organic compounds (VOCs) in the groundwater.
- There are two plumes of contaminated groundwater under the site:
 - One plume consists of BTEX and ketones in both shallow and deep wells. This contamination is attributed to solvent releases from historic paint-thinning activities at the site; and
 - A second plume contains chlorinated substances in the deep wells. Recent data indicates that this contamination is also attributable to historic GM operations.
- In November 2000, GM and MDE observed the rise of groundwater levels in both the shallow and deep aquifers. The rise in groundwater may be related to the reduced pumping activity in the Patuxent aquifer by a nearby industrial property (Red Star Yeast Co.). There is concern that during times of heavier groundwater use/pumping at Red Star Yeast that contamination from GM may have migrated offsite.
- In 1999, there was an on-site line leak to a gasoline dispenser. An undetermined amount of gasoline product entered a storm drain into Colgate Creek. As part of a remediation plan, over 2,000 cubic feet of contaminated soil was removed, and 40 geo-probe points were installed along with two temporary monitoring wells. Most recent sampling results indicate that the case can be closed, and MDE's Oil Control Program is waiting well closure reports before formally closing the case.
- The last plant-wide inspection of the facility with respect to air emission requirements was conducted in January 2005. The company was in compliance with all regulatory requirements. There are no outstanding enforcement actions related to air emissions.

Current Status

GM has established 28 groundwater monitoring wells throughout the site and is carrying out a semi-annual groundwater-sampling program to characterize the contaminant plumes.

Planned or Potential Future Action

Groundwater Contamination

- In May 2004, MDE asked GM to address several issues:
 - MDE required that GM update its groundwater sampling program and groundwater investigation.
 - MDE requested that GM attempt to better characterize the downward migration of dissolved BTEX and ketones to the deeper aquifers of the Patapsco Formation. The downward migration may pass through the Arundel Clay to the underlying Patuxent aquifers if a connection between the Patapsco and Patuxent Formations exists.
 - GM was also asked to characterize the chlorinated solvent plume in the deeper aquifer.
- GM informed MDE continues to develop a groundwater and contaminant transport model of the site to evaluate the current contamination condition. MDE has yet to receive any groundwater report from GM. In an April 2005 meeting between GM and MDE, GM indicated that they wished to deal with the plant closure issue first, and then they will address the groundwater issue. The site may be a good candidate for MDE's Brownfields/Voluntary Cleanup Program.

Corrective Action Permit

- Because GM has an active hazardous waste permit for the storage of RCRA hazardous waste, they are subject to the EPA's Corrective Action permitting requirements under Section 3004(u) of the Resource Conservation and Recovery Act (RCRA).
- Corrective action requires GM to undergo an assessment of all past and current waste management practices and determine if there have been any releases of contaminants that may present environmental or public health risks. Where warranted, GM must also propose remedial activities to treat or clean-up contamination, which may include ongoing groundwater monitoring and assessment by GM in out years.
- Although the Corrective Action Permit for GM has not been a high priority with EPA, there is no relief from the Corrective Action responsibilities, regardless of the facility's fate. The recent closure of GM's operations may trigger a reevaluation by EPA and elevation of GM's Corrective Action permitting status to a higher priority; however, because of current commitments it is unlikely that EPA would evaluate the GM site until after 2008.
- MDE Hazardous Waste Program will continue to meet with GM to discuss closure strategy and activities.

Air Emissions

- Reporting - The company continues to submit monthly reports on emission of VOCs in 2005. The final VOC report will cover the May 1 through May 13, 2005 production

period and should be submitted by mid-June. The company has been advised to submit all 2005 reports as soon as possible.

Asbestos

- If any asbestos is to be removed or encapsulated during renovations or demolition, the site owner must use a contractor licensed for such work by MDE.