

*GENERAL MOTORS COMPANY*

**GM CETC BEDFORD FACILITY**

**105 GM DRIVE**

**BEDFORD, INDIANA**

**EPA ID #IND006036099**

*ADMINISTRATIVE ORDER ON CONSENT*

*U.S. EPA DOCKET NO. V-W-'03-C-747*

*REMOVAL ACTION*

*CERCLA PROGRESS REPORT*

*SEPTEMBER/OCTOBER 2010*

**November 12, 2010**

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## 1.0 INTRODUCTION

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This Progress Report is submitted in accordance with the ADMINISTRATIVE ORDER ON CONSENT (AOC) FOR REMOVAL ACTION Proceeding Under Sections 104, 106(a), 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. SS 9604, 9606(a), 9607, and 9622 (United States Environmental Protection Agency (U.S. EPA) Docket No.: V-W-'03-C-747) effective July 31, 2003, and with the reporting modification approved August 11, 2009, to submit CERCLA Progress Reports bi-monthly.

The next Progress Report, for the months of November/December 2010, will be submitted on or before January 15, 2011.

## 2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

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- An agreement between GM and MLC for GM to complete the remaining soil removal work was signed and approved in early August 2010. Removal work of the stockpiled soil at Staging Area G was completed in September 2010 by Severson Environmental Services (SES). An area of floodplain soil under the soil pile will be excavated in spring 2011.
- A total of 30,392 tons of <50 mg/kg PCB material was removed from the soil stockpile at Staging Area G and hauled during September/October. A summary of PCB soil disposal to date is presented in Table 1.1 and a summary of hauling completed in September/October 2010 is presented in Table 1.2.
- A work plan to further delineate the area covered by Staging Area 'G' was approved by U.S. EPA and implemented during October. Boreholes were installed at 105 locations between October 7 and October 28. A total 269 samples were submitted for analysis: 19 samples from the clay pad and 250 from native soil beneath the pad. Intermediate summaries have been submitted to U.S. EPA and IDEM during the sampling. Some additional delineation sampling will be performed in November 2010. A summary of the sample results will be submitted under separate cover when data validation is complete.
- Spring 018 water continues to be collected and treated by SES's on-Site water treatment system. Sample results from SES's water treatment system during September/October 2010 are provided in Table 2.1.
- A combined public and neighborhood meeting was held on September 30 at the CRA Field Trailer to update the public of the progress of the project and discuss specific individual/neighbor issues.
- A CLP meeting was held on October 1 to discuss the status of the corrective action, removal action, and creek restoration.

- Conference calls were held on September 2 and 23, and October 8 and 28 with U.S. EPA and the Indiana Department of Environmental Management (IDEM) to discuss items related to the RA and the design and construction of the East Plant Area Interim Measures (IM).
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings were held on September 7, 14, 21, and 28 and on October 5, 12, 19, and 26. Tail gate safety meetings are held daily for both the consultant and the contractor.

### **3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS**

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Excavation of creek and floodplain soils remaining on Parcel 39A beneath the Staging Area G soil stockpile will likely not begin until spring 2011, after the winter and spring rainy seasons. The clean clay pad will be left in place over the winter as soil erosion protection to the remaining PCB impacted floodplain soil.

### **4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

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- The following is a list of anticipated work for the next reporting period:
  - Once approval is obtained from U.S. EPA and IDEM, placement of clean fill from the staging pad over the North Lawrence Water Corp water line realignment may be completed to build an access for the water corporation to work on the line. Additional removal of floodplain soil beneath the staging pad will be completed in spring 2011.
  - Complete additional sampling at Staging Area 'G' around two hot spots identified during October's delineation sampling to refine the delineation of contamination.
  - Submit an addendum to the Downstream Parcels Removal Action Work Plan for a prescriptive removal of the remaining excavation work under Staging Area 'G' based on the delineation completed in October and November.
  - Complete restoration of Parcel 40 farm field, west of Peerless Road.
  - Complete topsoil and grass seeding on properties east of Peerless Road.
  - Complete a public meeting and a CLP meeting scheduled for December 2 and 3, 2010.
  - Manage and treat storm water as needed.
  - Continue to collect and treat Spring 018 water in the SES temporary treatment system.

TABLE 1.1

**DISPOSAL SUMMARY OF PCB WASTE MATERIAL - SEPTEMBER/OCTOBER 2010  
GM CETC BEDFORD FACILITY  
BEDFORD, INDIANA**

	<i>September/October Total <sup>(2)</sup> (tons)</i>	<i>Total to Date (tons)</i>
Soil ≥50 mg/kg (Heritage Environmental Services)	0	319,912
Soil <50 mg/kg (Republic-Sycamore Ridge)	0	55,666
Soil <50 mg/kg (East Plant Grading Areas)	30,392	1,252,014
Soil ≥50 mg/kg (East Plant Area Vault - RCRA sources) <sup>(1)</sup>	0	187,078
Soil <50 mg/kg (East Plant Area Vault - RCRA sources) <sup>(1)</sup>	0	1,456
Total Volume Disposed	30,392	1,816,127

Note:

<sup>(1)</sup> Estimated from volume calculated using pre- and post-filling surveys of the vault. Conversion factor used was 1.4 tons per cubic yard.

<sup>(2)</sup> Based on estimated tonnage per truck.

TABLE 1.2

**DISPOSAL SUMMARY OF <50 mg/kg PCB MATERIAL - SEPTEMBER/OCTOBER 2010**  
**GM CETC BEDFORD FACILITY**  
**BEDFORD, INDIANA**

<i>Date</i>	<i>Number of Loads</i>	<i>Net Weight (lb) <sup>(1)</sup></i>	<i>Net Weight (tons) <sup>(1)</sup></i>
9/1/2010	83	2,869,559	1,435
9/2/2010	105	3,630,165	1,815
9/3/2010	0	--	--
9/6/2010	0	--	--
9/7/2010	106	3,664,738	1,832
9/8/2010	112	3,872,176	1,936
9/9/2010	108	3,733,884	1,867
9/10/2010	0	--	--
9/11/2010	0	--	--
9/13/2010	110	4,007,190	2,004
9/14/2010	98	3,570,042	1,785
9/15/2010	81	2,950,749	1,475
9/16/2010	87	3,169,323	1,585
9/17/2010	75	2,732,175	1,366
9/18/2010	0	--	--
9/20/2010	85	3,096,465	1,548
9/21/2010	83	3,023,607	1,512
9/22/2010	100	3,642,900	1,821
9/23/2010	0	--	--
9/24/2010	87	3,169,323	1,585
9/25/2010	0	--	--
9/27/2010	104	3,788,616	1,894
9/28/2010	108	3,934,332	1,967
9/29/2010	0	--	--
9/30/2010	105	3,825,045	1,913
10/1/2010	53	1,930,737	965
10/2/2010	0	--	--
10/14/2010	5	172,865	86
<b>AUGUST TOTALS</b>	1,695	60,783,891	30,392

## Notes:

<sup>(1)</sup> Truck weights based on average weight of trucks selected at random to be weighed at GM scales.

TABLE 2.1

**SES TREATMENT SYSTEM #1 SAMPLING RESULTS - SEPTEMBER/OCTOBER 2010**  
**GM CETC BEDFORD FACILITY**  
**BEDFORD, INDIANA**

<i>Sample Date</i>	<i>Analysis</i>	<i>Influent</i>	<i>After Sand Filter 1</i>	<i>After Sand Filter 2</i>	<i>Between Carbons 1 &amp; 3</i>	<i>Between Carbons 2 &amp; 4</i>	<i>Effluent</i>
9/2/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) / ND (0.10) 86.7 / 86.5	-- --	-- --	-- --	ND (0.10) 0.05	ND (0.10) 0.00
9/8/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 3.74	ND (0.10) 1.17	ND (0.10) 7.53	ND (0.10) 1.88	ND (0.10) 0.11	ND (0.10) 0.59
9/15/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 1.52	-- --	-- --	-- --	ND (0.10) 0.21	ND (0.10) / ND (0.10) 0.22 / 0.78
9/22/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 2.04	-- --	-- --	-- --	ND (0.10) 0.46	ND (0.10) 0.28
9/29/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) / ND (0.10) 1.06 / 1.04	-- --	-- --	-- --	ND (0.10) 0.93	ND (0.10) 0.59
10/5/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 5.49	ND (0.10) 3.59	ND (0.10) 0.38	ND (0.10) 0.20	ND (0.10) 0.00	ND (0.10) 0.00
10/13/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 10.11	-- --	-- --	-- --	ND (0.10) 0.12	ND (0.10) / ND (0.10) 0.22 / 0.22
10/20/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 31.30	-- --	-- --	-- --	ND (0.10) 1.60	ND (0.10) 0.92
10/27/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 4.41	-- --	-- --	-- --	ND (0.10) 0.39	ND (0.10) 0.38

## Note:

1) Bag filters were removed during maintenance/repair of the WTP in April 2010. Effluent now occurs after the final carbon filter

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY



**APPENDIX A**  
**DELIVERABLES SUMMARY**

<i>Deliverable</i>	<i>Reference</i>	<i>Deadline</i>	<i>Deliverable Due Date</i>	<i>Status</i>
Final Parcel 22 Workplan	AOC IV.23; VIII.34.a	Approved July 23, 2003	July 23, 2003	complete
Final Upstream Workplan	AOC IV.25; VIII.34.b	Approved July 23, 2003	July 23, 2003	complete
Designation of Contractors and Project Coordinator	AOC VII.30; VII.31	CRA & McGuigan – Effective Date of Order Other contractors – 5 business days prior to commencement of work	July 31, 2003	complete
Contractor HASP	'U.S. EPA Approval Letter, July 23, 2003'	before work is to begins		complete
QAPP	AOC VIII.34.c; VIII.37.a	QAPP – 10 business days AED *	August 14, 2003	complete
OMMP	AOC VIII.38	OMMP – 30 business days after completion of each portion of Work in Paragraph 34. Final OMMP due with Final Report		
Downstream Workplan	AOC VIII.34.d; VIII.35.a	90 days AED	October 29, 2003	complete
Site Source Control Workplan	AOC VIII.34.e; VIII.35.a	Approved November 11, 2003	August 21, 2003	complete
Progress Reports	AOC VIII.39.a	1 <sup>st</sup> 30 days AED	August 30, 2003	complete
	U.S. EPA Approval Email, August 11, 2009	15 <sup>th</sup> of every other month thereafter	November 15, 2010	submitted November 12, 2010
Final Report	AOC VIII.40	Within 90 days after required info is received and work completed		

Note:

AED = After Effective Date of Administrative Order on Consent