

GENERAL MOTORS LLC

**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
May/June 2012

July 11, 2012



**CONESTOGA-ROVERS
& ASSOCIATES**

July 11, 2012

Reference No. 013968

Mr. Brad Stimple
On-Scene Coordinator
U.S. EPA Region 5 - Cleveland Office
25089 Center Ridge Road
Westlake, OH 44145

Dear Mr. Stimple:

Re: Submittal of May/June 2012 Progress Report
Administrative Order on Consent for Removal Action
Docket No. V-W-'03-C-747
GM CETC - Bedford Facility
Bedford, Indiana

Consistent with the submittal requirements of Section VIII, Paragraph 39a of the Administrative Order on Consent (AOC), effective July 31, 2003, please find attached one copy of the May/June 2012 Progress Report for the above referenced Site.

The next Progress Report, covering July/August 2012, will be submitted on or before September 15, 2012.

Should you have any questions regarding this document, please do not hesitate to contact me at (708) 476-4793 or Cheryl Hiatt at (313) 510-4328.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

For J.M.

James J. McGuigan, P.E.
JJM/ck/130

Encl.

c.c.: see Distribution List (attached)

GM Bedford Distribution List

Peter Ramanauskas	U.S. EPA, Region 5
Gerald O'Callaghan	IDEM Management
Jim Smith	IDEM
Carl Wodrich	IDNR
Cheryl Hiatt/Ed Peterson	GM WFG Remediation
James McGuigan	CRA Project Manager
Bill Steinmann	CRA Project Geologist
Katie Kamm	CRA Oversight Engineer
Denise Heckler	TestAmerica - North Canton
Chris Kovitch	TestAmerica - Pittsburgh
Stephen Song	ENVIRON

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1.0 INTRODUCTION

This Progress Report covering activities completed in May and June 2012, 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 July/August 2012, will be submitted on or before September 14, 2012.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- Maintenance of storm water and erosion controls continued on an as-needed basis.
- Spring 018 water continued to be collected and treated by SES's on-Site water treatment system. U.S. EPA granted approval of a request to reduce the sampling frequency of the effluent from SES's water treatment system to bi-monthly on March 23, 2012. Sampling was completed under the new schedule in June during this period and the next sample will be collected in August 2012. Sample results from SES's water treatment system during May/June 2012 are provided in Table 1. Additional samples from Spring 018 have also been collected as part of an evaluation and discussion with U.S. EPA and IDEM regarding future remedial work at Spring 18.
- Restoration repairs to properties north of Broomsage Road (Parcels 24/25) were completed in April as well as a creek crossing being installed for the owner of Parcel 30 in April. Removal of log habitat structures from the Parcel 30 farm field area, per the property owner's request, will be scheduled for later this summer during drier weather as agreed to by the owner.
- The Document Repository at the Plant Lobby has been disassembled. Copies of the documents have been put on CD and are available at the Bedford Public Library. CDs will be periodically updated as new documents become available. The website will also continue to be updated and can be accessed at:
<http://www.bedfordpowertraincorrectiveaction.com>.
- On May 4, 2012, GM, RACER, Arcadis, and CRA participated in a conference call to discuss coordination of restoration plans between GM and RACER for properties west of the Peerless Road Bridge.

- GM presented a project status update to the Bedford Realtor Association on May 21, 2012. The purpose of the presentation was to update the group on the status of the remediation project.
- A conference call was held on May 10 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).
- An inspection of the condition of the restoration for Parcel 22 south of Broomsage Road was completed on May 31, 2012.
- A meeting was held with U.S. EPA, in Chicago, and IDEM by conference call on May 31, 2012. The purpose of the meeting was to discuss Spring 018 and proposed Removal Action modifications.
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. During this maintenance period, formal SES construction meetings were held on May 15 and June 12. Tailgate safety meetings are held daily for both the consultant and the contractor.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- Preliminary sample results from the coreholes, installed along the proposed clean-water diversion trench at Spring 018, had low-level total PCB detections in December 2011 and January 2012. GM is reviewing additional evaluation steps and possible additional design alternatives with U.S. EPA and IDEM. A meeting to discuss Spring 018 with U.S. EPA and IDEM was held on May 31, 2012. GM, U.S. EPA and IDEM will continue to discuss options for Spring 018 during the next reporting period. GM submitted a conceptual remediation plan to U.S. EPA and IDEM on June 26, 2012.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Continue to collect and treat Spring 018 water until agreement is reached between U.S. EPA and GM regarding future collection and treatment options.
 - Continue maintenance of erosion controls as needed.
 - Discuss the Spring 018 remediation Proposal with U.S. EPA and IDEM.
 - Sample SES's on-Site water treatment plant in August (assuming it remains in operation) in accordance with the bi-monthly monitoring schedule.
 - Continue development of the restoration design for the two remaining properties west of Peerless Road that GM LLC is responsible for. Restoration design will be completed in cooperation with RACER Trust, who owns two of the other properties upstream to the east.
 - Complete removal of select logs from property (Parcel 30) north of Broomsage Road.
 - Complete report outlining the results of the inspection of the restoration for Parcel 22 south of Broomsage Road.
 - Conduct Public and Community Liaison Panel (CLP) meetings in July 2012.

TABLE 1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - MAY/JUNE 2012
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 & 3</i>	<i>Between Carbons 2 & 4</i>	<i>Effluent</i>
6/12/2012	PCB (ug/L)	ND (0.19) / ND (0.19)	--	--	--	ND (0.19)	ND (0.20)
	Turbidity (NTU)	3.42 / 3.46	--	--	--	1.73	0.69

Note:

J - Estimated Value

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

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<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 U.S. EPA Approval Email, August 11, 2009	1 st 30 days AED ----- 15 th of every other month thereafter	August 30, 2003 July 15, 2012	complete submitted July 11, 2012
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