

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
July/August 2012

September 14, 2012



**Worldwide Facilities Group
Remediation Team**

September 14, 2012

Reference No. 013968

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

Mr. Peter Ramanauskas
Project Manager for IND 0060306099
Waste, Pesticide and Toxins Division
U.S. EPA Region 5
77 West Jackson Blvd. (DW-8J)
Chicago, IL 60604-3590

Dear Messers Stimple and Ramanauskas:

Re: GM Powertrain – Bedford Facility, IND 006036099
Submittal of the July/August 2012 Progress Report and
Proposed Consolidation of Bi-Monthly and Quarterly Reports
GM Powertrain Group, Bedford Indiana 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 July/August 2012 Progress Report for the above referenced Site.

At this time, General Motors Corporation (GM) respectfully requests that U.S. EPA allow the consolidation of the Monthly Reports required under Section VIII (39a) of the Administrative Order on Consent (AOC), effective July 31, 2003, and modified as Bi-Monthly Reports on August 11, 2009, into the Quarterly Reports, required under Section V (4b) of the Bedford Performance-Based Corrective Action Agreement (Agreement) between the United States Environmental Protection Agency (U.S. EPA) and GM, executed on March 20, 2001, and amended October 1, 2002, March 29, 2008, and May 9, 2008.

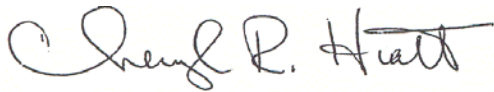
Per the August 11, 2009 approval for Bi-Monthly reporting, U.S. EPA indicated it would consider combining RCRA and CERCLA reporting requirements at the conclusion of the excavation phase of the Downstream Parcels Removal Action. GM has subsequently completed the Downstream Parcels Removal work, has completed substantial portions of the Creek restoration, and is actively working with U.S. EPA and IDEM on a long-term resolution for Spring 018. GM believes that the regular summation of remaining Removal Action activities can be accommodated in the Quarterly Reports. This will allow regular updates to U.S. EPA, but reduce the volume of reporting and the corresponding storage requirements, as well as remove the duplication of efforts in preparing progress reports. Additionally, bi-weekly conference calls allow for the discussion of ongoing issues on a more frequent basis if needed. Therefore, GM would like to terminate the Bi-Monthly Reporting and incorporate it into the Quarterly Reporting.

Messers Stimple and Ramanauskas
September 14, 2012
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Should you have any questions regarding this subject, please do not hesitate to contact me at (313) 510-4328.

Yours truly,

General Motors Corporation

A handwritten signature in black ink that reads "Cheryl R. Hiatt". The signature is written in a cursive style with a large initial "C" and a long horizontal stroke at the end.

Cheryl R. Hiatt
Project Manager

PG/cs/
Encl.

c.c.: See Attached Distribution List

GM Bedford Distribution List

Peter Ramanauskas	U.S. EPA, Region 5
Brad Stimple	U.S. EPA, OSC
Gerald O'Callaghan	IDEM Management
Jim Smith	IDEM
Carl Wodrich	IDNR
Ed Peterson	GM WFG Remediation
James McGuigan	CRA Project Manager
Bill Steinmann	CRA Project Geologist
Katie Kamm	CRA Oversight Engineer

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1.0 INTRODUCTION

This Progress Report covering activities completed in July and August 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.

A request has been included with this report to combine the Bi-Monthly (completed under CERCLA) and Quarterly (completed under Resource Conservation and Recover Act [RCRA]). If the request is approved the next CERCLA progress update will be reported with the Third Quarter Progress Report by October 15, 2012. If the request is not approved prior to the Quarterly report submission, the next CERCLA Progress Report, for the months of September/October 2012, will be submitted on or before November 15, 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 August during this period and the next sample will be collected in October 2012. Sample results from SES's water treatment system during July/August 2012 are provided in Table 1. Additional samples from Spring 018 and the creek and nearby coreholes have also been collected as part of an evaluation and discussion with U.S. EPA and IDEM regarding future remedial work at Spring 018. Remedial and restoration design for the area surrounding Spring 018 continued in July and August, in consultation with U.S. EPA and IDEM.
- Removal of certain log habitat structures from the Parcel 30 farm field area, per the property owner's request, was completed in August 2012.
- 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>.
- Fact Sheet 34 was published on July 18, 2012.

- Public and Community Liaison Panel (CLP) meetings were held on July 25, 2012 to provide an update of the project and address questions and concerns from local residents.
- Conference calls were held on July 20 and August 7 and 23, 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. During this maintenance period, formal SES construction meetings were held on July 10 and August 14. 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 submitted a conceptual remediation plan to U.S. EPA and IDEM on June 26, 2012, and continued work on restoration design through this reporting period. GM also conducted additional sampling and monitoring efforts to more fully understand the Spring 018 hydrogeologic system. The Spring 018 sampling results from the reporting period are presented in Table 2.

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 while working through remedial and restoration alternatives.
 - Continue maintenance of erosion controls as needed.
 - Sample SES's on-Site water treatment plant in October in accordance with the monitoring schedule.
 - Continue development of the restoration design for the two remaining properties west of Peerless Road that GM LLC is responsible for. Complete report outlining the results of the inspection of the restoration for Parcel 22 south of Broomsage Road.

TABLE 1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - JULY/AUGUST 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>
8/14/2012	PCB (ug/L)	0.071 J	0.073 J	0.063 J	ND (0.20)	ND (0.19)	ND (0.20)
	Turbidity (NTU)	1.73	0.26	0.55	0.06	0.41	0.09

Note:

J - Estimated Value

ND - Non detect

"--" - Not Sampled

TABLE 2

SPRING 018 PRELIMINARY RESULTS SUMMARY - JULY/AUGUST 2012
GM CETC BEDFORD FACILITY
BEDFORD, INDIANA

Sample Location		<i>Spring 018C</i>	<i>Spring 018C</i>	<i>Spring 018C</i>	<i>Spring 018C</i>
Sample Identification		SW-015-071112-GS-39868	SW-015-071812-KMV-39869	SW-015-080812-GS-39870	SW-015-080812-GS-39871
Sample Date		7/11/2012	7/18/2012	8/8/2012	8/8/2012
Sample Type					Duplicate
	<i>Units</i>				
PCBs					
Aroclor-1016 (PCB-1016)	ug/L	0.19 U	0.20 U	0.19 U	0.20 U
Aroclor-1232 (PCB-1232)	ug/L	0.19 U	0.20 U	0.19 U	0.20 U
Aroclor-1242 (PCB-1242)	ug/L	0.63	0.20 U	0.34	0.35
Aroclor-1248 (PCB-1248)	ug/L	0.19 U	0.53	0.19 U	0.20 U
Aroclor-1254 (PCB-1254)	ug/L	0.19 U	0.20 U	0.19 U	0.20 U
Aroclor-1260 (PCB-1260)	ug/L	0.19 U	0.20 U	0.19 U	0.20 U
Total PCBs	ug/L	0.63	0.53	0.34	0.35
General Chemistry					
Total suspended solids (TSS)	ug/L	3000 J	4000	4000 U	4000 U

Notes:

U - Not present at or above the associated value.

J - Result is less than the RL (reporting limit) but greater than or equal to the MDL (method detection limit) and the concentration is an approximate value.

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	1 st 30 days AED -----	August 30, 2003	complete
	U.S. EPA Approval Email, August 11, 2009	15 th of every other month thereafter	September 15, 2012	submitted September 14, 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