



June 26, 2020

Peter Ramanauskas
U.S. EPA Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Dear Mr. Ramanauskas:

Re: RCRA Corrective Action Administrative Order on Consent (AOC)
Progress Report 77, Second Quarter 2020
GM GPS – Bedford Facility, ID 006036099, Docket No. RCRA 05 2017 0011
Bedford, Indiana

This Progress Report is submitted by General Motors LLC (GM) in accordance with the GM Bedford Global Propulsion Systems (GPS) Facility Resource Conservation and Recovery Act (RCRA) Administrative Order on Consent (AOC – United States Environmental Protection Agency [U.S. EPA] Docket No. RCRA 05-2014-0011), executed on August 4, 2014. This report covers the period of the second calendar quarter of 2020 for the RCRA Corrective Action (CA) Project at the GM GPS – Bedford Facility (Facility) and select surrounding properties (Site), Bedford, Indiana.

The next RCRA progress report covering the third quarter of 2020 will be submitted on or before October 15, 2020.

1. List of Completed Activities

The following activities took place and the following documents were prepared and distributed during this quarter:

1. The Groundwater Treatment Plant (GWTP) collected and treated water from the Pilot Trench, Vault sumps, and wet wells during the second quarter of 2020. Operational and compliance samples were collected monthly. Monthly discharge monitoring reports have been submitted to the State of Indiana in conformance with the National Pollutant Discharge Elimination System (NPDES) Permit Number IN0064424.
2. Progress Report 76 covering the fourth quarter of 2019 was submitted to U.S. EPA on April 14, 2020.
3. Absorbent socks were removed and replaced from CH-5A and MW-X209Y053 in April 2020. Due to the COVID-19 business disruption, the sock change out did not occur in May and June 2020.
4. Oil collection from CH-2A (solar sipper) was on-going during the quarter, but at a reduced rate due to system inefficiencies.
5. Monitoring well TMW-X225Y080 (in the million gallon tank area) was abandoned in April 2020.



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6. Memo summarizing the cleanout inspections was submitted to U.S.EPA on April 24, 2020.
7. Monthly conference calls/meetings were held with U.S. EPA and IDEM in April, May and June 2020.
8. On-site tailgate meetings for the reporting period were held daily, during field activities, to discuss safety and project scope.

Although not included in the RCRA CA activities, GM continues to work with U.S. EPA and IDEM for the prescriptive removal of PCB-impacted soil at Parcels 400, 430 and 431. The following activities took place and the following documents were prepared and distributed during this quarter related to this work:

1. Additional waste characterization samples were collected from the Parcel 400/430/431 area in April 2020, as required by Heritage.
2. Soil borings were advanced along the western property line of Parcels 400 and 430 to delineate the depth of bedrock.
3. GM conducted interview with remediation contractors and is evaluating bid proposals.

2. Summaries of Problems and Planned Resolutions

During March 2020, the United States became increasingly impacted by the uncertainties surrounding the global COVID-19 pandemic. Due to the business disruption caused by the pandemic, GM and U.S.EPA agreed to suspend or defer select project tasks until the business disruption has diminished. During June 2020, state governments and companies began to lift work restrictions. GM is accordingly evaluating the ability to safely resume those suspended and deferred activities in accordance with the agreed upon schedule.

3. Projected Work for the Next Reporting Period

Work anticipated for the next reporting period, based on GM's proposed suspended or deferred project tasks includes:

1. Continue OMM for the GWTP.
2. Continue GWTP discharge reporting under the NPDES permit.
3. Submit the NPDES permit renewal application.
4. Submit the 2019 Annual Vault Report.
5. Collect monthly transducer data from the pilot trench monitoring locations.
6. Submit the RFI Addendum.
7. Submit the Spring 018 Summary memo.
8. Conduct EI CA750 groundwater sampling.
9. Prepare and implement the clarifier area oil recovery work plan.
10. Prepare short-term OMM plan for completed on-site remedial action items.
11. Implement the Parcel 400/430/431 prescriptive soil removal.
12. Prepare for the annual agency meeting tentatively scheduled for August 4, 2020.
13. Provide U.S. EPA and IDEM project updates via emails and/or telephone calls.



G E N E R A L M O T O R S

Please feel free to call me at 313-506-9465 if you have any questions concerning this information or otherwise regarding the Bedford GM LLC Project.

Sincerely,



Ed Peterson
Project Manager, Eco-Restorers
GM Sustainable Workplaces

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Encl.

cc: Daniel Haag; U.S. EPA
Chris Myer; IDEM
Ed Peterson; General Motors
Nathan Milliman; General Motors
John Maher; General Motors

Katie Kamm; GHD
Julie Luzwick; GHD
Bill Steinmann; GHD
Francis Ramacciotti; GHD



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