



January 11, 2019

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 71, Fourth Quarter 2018  
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 fourth calendar quarter of 2018 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 first quarter of 2019 will be submitted on or before April 15, 2019.

## 1. List of Completed Activities

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

1. Results for the Spring 018 sample collected during this quarter are presented in Table 1. The fourth quarterly sampling was conducted on October 11, 2018. The sample was non-detect for polychlorinated biphenyls (PCBs). The 12-month rolling average concentration of (PCBs) in the Spring 018 is 0.10 micrograms per liter ( $\mu\text{g/L}$ ). Semi-annual sampling is scheduled to take place in January and July of 2019.
2. The groundwater water treatment plant (GWTP) collected and treated approximately 9,273,385 gallons of water from the Pilot Trench, Vault sumps, and wet wells during the fourth quarter of 2018. An estimated 0.11 pounds of PCBs were removed during the quarter through collection and treatment of the groundwater. An estimated 0.44 pounds of PCBs have been removed over the last 12 months (January 2018 through December 2018). A summary of the volumes and sample results used for this calculation is provided in Table 2. Monthly discharge



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monitoring reports have been submitted to the State of Indiana in conformance with the National Pollutant Discharge Elimination System (NPDES) Permit Number IN0064424.

3. Responses to U.S.EPA comments on the East Plant Area Vault Annual Report Covering the Calendar Year of 2017 were sent to U.S.EPA on October 29, 2018. A revised report based on U.S.EPA comments were submitted to U.S.EPA on December 5, 2018.
4. The Second Half 2018 EI CA750 sampling was completed during the last week of November 2018.
5. Pilot Trench Monitoring Plan responses to U.S. EPA comments were submitted on November 2, 2018.
6. Pilot Trench monthly static groundwater monitoring was completed on October 23, November 26, and December 26, 2018.
7. AOI-8 solar sipper began oil collection from CH-2A on October 4, 2018. The initial absorbent sock was place in CH-5 on October 19, 2018. Table 3 summarizes oil removal volumes (based on disposal weights). An estimated 7.33 pounds of PCBs have been removed from CH-5.
8. First shipment of solids from the AOI-8 oil collection process was sent for disposal on December 4, 2018.
9. Semi-annual formal monitoring of the East Plant, West Plant and Vault cover systems for the fourth quarter was completed on October 29, 2018. Photographic log and inspection sheets of the inspection are in Appendix A.
10. Perimeter fencing along the southern portion of the East Plant Area was completed on October 12, 2018.
11. Conference calls/meetings were held with U.S. EPA and IDEM on October 4, 25, November 8, 21 and December 6, 2018, to discuss items related to the project.
12. A public meeting was held in Bedford on December 6, 2018.
13. Depressions in the West Plant asphalt were temporarily filled on December 5, 2018.
14. A pre-bid meeting for the balance of the perimeter fence installation was held on December 14, 2018.
15. On-site tailgate meetings for the reporting period were held daily to discuss safety topics related to on-going maintenance activities.
16. RCRA Quarterly Progress Report #70, covering the third quarter of 2018, was submitted to the U.S. EPA and IDEM on October 13, 2018

## 2. Summaries of Problems and Planned Resolutions

GPRS was hired to perform video inspections of the Vault, Gravel Underdrain System (GUS), and pilot trench cleanouts. GPRS was on site during the last week of November 2018 to conduct the inspections. The camera used was approximately 18-inches long, attached to flexible cable. Due to the length of the camera, the units could not navigate the bends in the cleanout piping. GHD has rented a Pearpoint P571 push rod camera. Delivery of the camera is scheduled for January 2019.



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### 3. Community Relations

A public meeting was held on December 6, 2018 at the GHD trailers to the update the public on the status of the clean-up efforts. Presentations for the December 6, 2018 meeting and past meetings are posted on the GM website at: [www.bedfordpowertraincorrectiveaction.com](http://www.bedfordpowertraincorrectiveaction.com).

### 4. Changes in Personnel During the Reporting Period

Sevenson Environmental Services has demobilized for the Site.

GM project management has been restructured with the retirement of Cheryl Hiatt at the end of December 2018. Ed Peterson will be assuming the role of Project manager.

### 5. Projected Work for the Next Reporting Period

Work anticipated for the next reporting period includes:

1. Conduct the Spring 018 semi-annual sampling event.
2. Continue OMM for the GWTP.
3. Continue GWTP discharge reporting under the NPDES permit.
4. Collect quarterly groundwater static levels.
5. Collect NAPL from the AOI-8 area wells CH-2A and CH-5.
6. Install the eastern and northern perimeter fence.
7. Inspect the Vault, GUS and Pilot Trench cleanouts
8. Fill the voids identified beneath the West Plant asphalt cover (Spring, weather dependent)
9. Prepare for and conduct the Pilot Trench thermal study
10. Install remaining wells proposed for the Pilot Trench Monitoring study
11. Install wells proposed for the Clarifier area investigation
12. Collect follow-up soil samples (grab) from the incremental soil sampling program.
13. Finalize the Stormwater Pond Sediment Removal Construction Certification Report.
14. Complete the outstanding responses to comments for the RFI Report, Pilot Trench Monitoring Plan, Clarifier Sampling Memo, and the Pilot Trench Construction Certification Report.
15. Submit a summary memorandum to report results of the Second Half 2018 EI CA750 sampling event.
16. Conduct monthly meetings with U.S.EPA.

### 6. Copies of Inspection Reports and Laboratory/Monitoring Data

Analytical data have been, and will continue to be submitted to U.S. EPA as the validated data becomes available. As noted above, Spring 018 results are provided in Table 2.1 and Appendix A includes the field monitoring forms for the cover system inspections.



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, Remediation Services  
GM Sustainable Workplaces

YD/aj/181

Encl.

cc: Daniel Haag; U.S.EPA  
Chris Myer; IDEM  
Carl Wodrich; IDNR  
Ed Peterson; General Motors  
Ryan McDuffee; General Motors  
Katie Kamm; GHD  
Julie Luzwick; GHD



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Table 2.1

**Spring 018 Sampling Results - Fourth Quarter 2018**  
**GM GPS Bedford Facility**  
**Bedford, Indiana**

|                               |                               |
|-------------------------------|-------------------------------|
| <b>Area</b>                   | <b>P015</b>                   |
| <b>Sample Location:</b>       | <b>Spring 018C</b>            |
| <b>Sample Identification:</b> | <b>SW-015-101118-MC-41014</b> |
| <b>Sample Date:</b>           | <b>10/11/2018</b>             |

| <b>Parameters</b>       | <b>Units</b> |        |
|-------------------------|--------------|--------|
| <b>PCBs</b>             |              |        |
| Aroclor-1016 (PCB-1016) | ug/L         | 0.19 U |
| Aroclor-1221 (PCB-1221) | ug/L         | 0.19 U |
| Aroclor-1232 (PCB-1232) | ug/L         | 0.19 U |
| Aroclor-1242 (PCB-1242) | ug/L         | 0.19 U |
| Aroclor-1248 (PCB-1248) | ug/L         | 0.19 U |
| Aroclor-1254 (PCB-1254) | ug/L         | 0.19 U |
| Aroclor-1260 (PCB-1260) | ug/L         | 0.19 U |
| Total PCBs              | ug/L         | ND     |

**Wet**

|                              |      |      |
|------------------------------|------|------|
| Total suspended solids (TSS) | ug/L | 1200 |
|------------------------------|------|------|

## Notes:

U - Not detected at the associated reporting limit.

J - Estimated concentration.

UJ - Not detected; associated reporting limit is estimated.

ND - Non-Detect for total PCBs

Table 2.2

**GWTP PCB Mass Removal Estimate  
GM Bedford GPS Facility  
Bedford, Indiana**

|                                                                       | <b>Groundwater<br/>Treatment Plant (GWTP)<br/>Treated Volume<br/>(gallon)</b> | <b>PCB Influent<br/>Concentration<br/>(µg/L)</b> | <b>Mass PCB<br/>Treated<br/>(pound)</b> |
|-----------------------------------------------------------------------|-------------------------------------------------------------------------------|--------------------------------------------------|-----------------------------------------|
| January 2018 <sup>1</sup>                                             | 3,120,854                                                                     | 1.6                                              | 0.040                                   |
| February 2018                                                         | 4,425,851                                                                     | 2.2                                              | 0.081                                   |
| March 2018                                                            | 3,850,599                                                                     | 1.5                                              | 0.048                                   |
| April 2018                                                            | 4,000,022                                                                     | 0.99                                             | 0.033                                   |
| May 2018 <sup>1</sup>                                                 | 1,442,112                                                                     | 2.3                                              | 0.028                                   |
| June 2018 <sup>1</sup>                                                | 1,944,773                                                                     | 1.5                                              | 0.024                                   |
| July 2018 <sup>1</sup>                                                | 1,205,563                                                                     | 1.55                                             | 0.016                                   |
| August 2018 <sup>4</sup>                                              | 1,029,510                                                                     | 1.75                                             | 0.015                                   |
| September 2018                                                        | 2,765,584                                                                     | 1.6                                              | 0.037                                   |
| October 2018 <sup>1</sup>                                             | 1,240,147                                                                     | 1.9                                              | 0.020                                   |
| November 2018 <sup>1</sup>                                            | 3,806,472                                                                     | 1.55                                             | 0.049                                   |
| December 2018                                                         | 4,226,766                                                                     | 1.29                                             | 0.046                                   |
| Total Estimated Volume of Water Treated, Third Quarter 2018 (gallons) |                                                                               |                                                  | 9,273,385                               |
| Total Estimated Mass of PCB Treated, Fourth Quarter 2018 (pounds)     |                                                                               |                                                  | 0.11                                    |
| Total Estimated Mass of PCB Treated, Since January 2018 (pounds)      |                                                                               |                                                  | 0.44                                    |

## Notes:

<sup>1</sup> PCB concentration based on an average of parent and duplicate sample

**Table 3****AOI-8 Oil Removal  
GM Bedford GPS Facility  
Bedford, Indiana**

| Date                     | Well  | Weight (lbs) | PCB Weight (lbs) <sup>1</sup> |
|--------------------------|-------|--------------|-------------------------------|
| 10/31/2018               | CH-5A | 2.16         | 1.68                          |
| 11/5/2018                | CH-5A | 2.28         | 1.78                          |
| 11/23/2018               | CH-5A | 2.09         | 1.63                          |
| 12/4/2018                | CH-5A | 2.81         | 2.19                          |
| 1/9/2019                 | CH-5A | 2.22         | <u>1.73</u>                   |
| <b>Total PCB Removed</b> |       |              | <b>7.33</b>                   |

## Notes:

<sup>1</sup> PCB weight based on analytical data from April 9, 2014  
(CH-5: 780,000 mg/kg; CH-2A: 13,000 mg/kg)

# Appendix A





Photo 1: Vegetation along EV2 facing southeast



## Cover System Inspection Fourth Quarter 2018



Photo 2: EV3 East Plant Cover facing southeast



## Cover System Inspection Fourth Quarter 2018



Photo 3: Vegetation at ES1 along EV1 facing southeast



## Cover System Inspection Fourth Quarter 2018



Photo 4: EV3 at ES9 East Plant Cover area facing southeast



## Cover System Inspection Fourth Quarter 2018



Photo 5: ES2 East Plant Area Cover facing southwest



## Cover System Inspection Fourth Quarter 2018



Photo 6: EV2 East Plant Cover area facing southeast



## Cover System Inspection Fourth Quarter 2018



Photo 7:           Vegetation at ES6 facing south at EV5



## Cover System Inspection Fourth Quarter 2018



Photo 8:           Vegetation along EV5 East Plant Area Cover facing south



## Cover System Inspection Fourth Quarter 2018





Photo 9:           Vegetation north of ES6 East Plant Area Cover facing southeast



## Cover System Inspection Fourth Quarter 2018



Photo 10: EV6 near EA1 East Plant Area Cover facing south



## Cover System Inspection Fourth Quarter 2018



Photo 11:       Vegetation at EV8 East Plant Cover area facing southwest



## Cover System Inspection Fourth Quarter 2018



Photo 12: Vegetative growth along EV5 East Plant Area facing southwest



## Cover System Inspection Fourth Quarter 2018



Photo 13: Vegetation growth at ES12 East Plant Area Cover facing west



## Cover System Inspection Fourth Quarter 2018



Photo 14: EV7 East Plant Cover facing south



## Cover System Inspection Fourth Quarter 2018



Photo 15: EV6 East Plant Area Cover area facing southwest



## Cover System Inspection Fourth Quarter 2018



Photo 16: East Plant Area Cover north of EV7 facing south



## Cover System Inspection Fourth Quarter 2018





Photo 17: Drainage along EV9 East Plant Area Cover facing southwest



## Cover System Inspection Fourth Quarter 2018



Photo 18:           Vegetation at ES14 East Plant Area Cover facing southwest



## Cover System Inspection Fourth Quarter 2018

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

Date of Inspection: 10/29/2018 sunny  
 Inspector: mike curtis 46 degrees F

| ITEM                               | TYPES OF PROBLEMS                                                                                               | CHECKED     |                            | DETAILED ACTIONS REQUIRED             | DATE AND NATURE OF ACTIONS COMPLETED |
|------------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------|----------------------------|---------------------------------------|--------------------------------------|
|                                    |                                                                                                                 | NO PROBLEMS | CORRECTIVE ACTION REQUIRED |                                       |                                      |
| <b>VEGETATED SOIL COVER SYSTEM</b> |                                                                                                                 |             |                            |                                       |                                      |
| <u>Transect EV1</u>                | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                    | - EXPOSURE OF LINER                                                                                             | X           |                            |                                       |                                      |
|                                    | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                    | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X           |                            |                                       |                                      |
|                                    | - PONDING OF WATER/DRAINAGE                                                                                     |             |                            |                                       |                                      |
|                                    | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                    | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |
| <u>Transect EV2</u>                | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                    | - EXPOSURE OF LINER                                                                                             | X           |                            |                                       |                                      |
|                                    | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                    | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X           |                            |                                       |                                      |
|                                    | - PONDING OF WATER/DRAINAGE                                                                                     | X           |                            |                                       |                                      |
|                                    | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                    | - ROOTING OF TREES                                                                                              |             |                            |                                       |                                      |

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                                           | TYPES OF PROBLEMS   | CHECKED                                                                                                         |                            | DETAILED ACTIONS REQUIRED | DATE AND NATURE OF ACTIONS COMPLETED  |
|------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------|---------------------------------------|
|                                                |                     | NO PROBLEMS                                                                                                     | CORRECTIVE ACTION REQUIRED |                           |                                       |
| <b>VEGETATED SOIL COVER SYSTEM (CONTINUED)</b> |                     |                                                                                                                 |                            |                           |                                       |
|                                                | <u>Transect EV3</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |
|                                                |                     | - EXPOSURE OF LINER                                                                                             | X                          |                           |                                       |
|                                                |                     | - EROSION                                                                                                       | X                          |                           |                                       |
|                                                |                     | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X                          |                           |                                       |
|                                                |                     | - PONDING OF WATER/DRAINAGE                                                                                     | X                          |                           |                                       |
|                                                |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |
|                                                |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |
|                                                | <u>Transect EV4</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |
|                                                |                     | - EXPOSURE OF LINER                                                                                             | X                          |                           |                                       |
|                                                |                     | - EROSION                                                                                                       | X                          |                           | slight erosion                        |
|                                                |                     | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X                          |                           |                                       |
|                                                |                     | - PONDING OF WATER/DRAINAGE                                                                                     | X                          |                           |                                       |
|                                                |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |
|                                                |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |
|                                                | <u>Transect EV5</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |
|                                                |                     | - EXPOSURE OF LINER                                                                                             | X                          |                           |                                       |
|                                                |                     | - EROSION                                                                                                       | X                          |                           | slight erosion                        |
|                                                |                     | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X                          |                           |                                       |
|                                                |                     | - PONDING OF WATER/DRAINAGE                                                                                     | X                          |                           |                                       |
|                                                |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |
|                                                |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                                           | TYPES OF PROBLEMS                                                                                               | CHECKED     |                            | DETAILED ACTIONS REQUIRED             | DATE AND NATURE OF ACTIONS COMPLETED |
|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------|----------------------------|---------------------------------------|--------------------------------------|
|                                                |                                                                                                                 | NO PROBLEMS | CORRECTIVE ACTION REQUIRED |                                       |                                      |
| <b>VEGETATED SOIL COVER SYSTEM (CONTINUED)</b> |                                                                                                                 |             |                            |                                       |                                      |
| <u>Transect EV6</u>                            | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                                | - EXPOSURE OF LINER                                                                                             | X           |                            |                                       |                                      |
|                                                | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                                | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X           |                            |                                       |                                      |
|                                                | - PONDING OF WATER/DRAINAGE                                                                                     | X           |                            |                                       |                                      |
|                                                | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                                | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |
| <u>Transect EV7</u>                            | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                                | - EXPOSURE OF LINER                                                                                             | X           |                            |                                       |                                      |
|                                                | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                                | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X           |                            |                                       |                                      |
|                                                | - PONDING OF WATER/DRAINAGE                                                                                     | X           |                            |                                       |                                      |
|                                                | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                                | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |
| <u>Transect EV8</u>                            | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                                | - EXPOSURE OF LINER                                                                                             | X           |                            |                                       |                                      |
|                                                | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                                | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X           |                            |                                       |                                      |
|                                                | - PONDING OF WATER/DRAINAGE                                                                                     | X           |                            |                                       |                                      |
|                                                | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                                | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                                           | TYPES OF PROBLEMS   | CHECKED                                                                                                         |                            | DETAILED ACTIONS REQUIRED | DATE AND NATURE OF ACTIONS COMPLETED  |  |
|------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------|---------------------------------------|--|
|                                                |                     | NO PROBLEMS                                                                                                     | CORRECTIVE ACTION REQUIRED |                           |                                       |  |
| <b>VEGETATED SOIL COVER SYSTEM (CONTINUED)</b> |                     |                                                                                                                 |                            |                           |                                       |  |
|                                                | <u>Transect EV9</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                                |                     | - EXPOSURE OF LINER                                                                                             | X                          |                           |                                       |  |
|                                                |                     | - EROSION                                                                                                       | X                          |                           |                                       |  |
|                                                |                     | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X                          |                           |                                       |  |
|                                                |                     | - PONDING OF WATER/DRAINAGE                                                                                     | X                          |                           |                                       |  |
|                                                |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                                |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |
|                                                | <u>Transect WV1</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                                |                     | - EXPOSURE OF LINER                                                                                             | X                          |                           |                                       |  |
|                                                |                     | - EROSION                                                                                                       | X                          |                           |                                       |  |
|                                                |                     | - LOCALIZED SETTLEMENT/SLUMPING                                                                                 | X                          |                           |                                       |  |
|                                                |                     | - PONDING OF WATER/DRAINAGE                                                                                     | X                          |                           |                                       |  |
|                                                |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                                |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |

TABLE D.1

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                              | TYPES OF PROBLEMS                       | CHECKED     |                            | DETAILED ACTIONS REQUIRED | DATE AND NATURE OF ACTIONS COMPLETED |
|-----------------------------------|-----------------------------------------|-------------|----------------------------|---------------------------|--------------------------------------|
|                                   |                                         | NO PROBLEMS | CORRECTIVE ACTION REQUIRED |                           |                                      |
| <b>HARD SURFACE COVER SYSTEMS</b> |                                         |             |                            |                           |                                      |
| <u>Transect EA1</u>               | - QUALITY OF ASPHALT COVER              | x           |                            |                           |                                      |
|                                   | - PRESENCE OF CRACKING OR DISCOLORATION | X           |                            |                           |                                      |
| <u>Transect EA2</u>               | - QUALITY OF ASPHALT COVER              | x           |                            |                           |                                      |
|                                   | - PRESENCE OF CRACKING OR DISCOLORATION | X           |                            |                           |                                      |
| <u>Transect WA1</u>               | - QUALITY OF ASPHALT COVER              | x           |                            |                           |                                      |
|                                   | - PRESENCE OF CRACKING OR DISCOLORATION | X           |                            |                           |                                      |
| <b>ACCESS ROAD</b>                |                                         |             |                            |                           |                                      |
| <u>ACCESS ROAD</u>                | - EROSION                               | X           |                            |                           |                                      |
|                                   | - OBSTRUCTIONS/DEBRIS                   | x           |                            |                           |                                      |
|                                   | - POTHOLES                              | X           |                            |                           |                                      |
|                                   | - DAMAGE CAUSED BY VEHICULAR TRAFFIC    | X           |                            |                           |                                      |

TABLE D.1

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                          | TYPES OF PROBLEMS                                                                                               | CHECKED     |                            | DETAILED ACTIONS REQUIRED             | DATE AND NATURE OF ACTIONS COMPLETED |
|-------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------|----------------------------|---------------------------------------|--------------------------------------|
|                               |                                                                                                                 | NO PROBLEMS | CORRECTIVE ACTION REQUIRED |                                       |                                      |
| <b>SWALE/DRAINAGE DITCHES</b> |                                                                                                                 |             |                            |                                       |                                      |
| <u>Transect ES1</u>           | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                               | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                               | - OBSTRUCTIONS                                                                                                  | X           |                            |                                       |                                      |
|                               | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X           |                            |                                       |                                      |
|                               | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                               | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |
| <u>Transect ES2</u>           | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                               | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                               | - OBSTRUCTIONS                                                                                                  | X           |                            |                                       |                                      |
|                               | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X           |                            |                                       |                                      |
|                               | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                               | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |
| <u>Transect ES3</u>           | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                               | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                               | - OBSTRUCTIONS                                                                                                  | X           |                            |                                       |                                      |
|                               | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X           |                            |                                       |                                      |
|                               | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                               | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |



COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                                      | TYPES OF PROBLEMS   | CHECKED                                                                                                         |                            | DETAILED ACTIONS REQUIRED | DATE AND NATURE OF ACTIONS COMPLETED  |  |
|-------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------|---------------------------------------|--|
|                                           |                     | NO PROBLEMS                                                                                                     | CORRECTIVE ACTION REQUIRED |                           |                                       |  |
| <b>SWALE/DRAINAGE DITCHES (CONTINUED)</b> |                     |                                                                                                                 |                            |                           |                                       |  |
|                                           | <u>Transect ES4</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                           |                     | - EROSION                                                                                                       | X                          |                           |                                       |  |
|                                           |                     | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |  |
|                                           |                     | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |  |
|                                           |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                           |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |
|                                           |                     |                                                                                                                 |                            |                           |                                       |  |
|                                           | <u>Transect ES5</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                           |                     | - EROSION                                                                                                       | X                          |                           |                                       |  |
|                                           |                     | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |  |
|                                           |                     | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |  |
|                                           |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                           |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |
|                                           |                     |                                                                                                                 |                            |                           |                                       |  |
|                                           | <u>Transect ES6</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                           |                     | - EROSION                                                                                                       | X                          |                           | slight erosion                        |  |
|                                           |                     | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |  |
|                                           |                     | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |  |
|                                           |                     | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                           |                     | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |
|                                           |                     |                                                                                                                 |                            |                           |                                       |  |

TABLE D.1

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

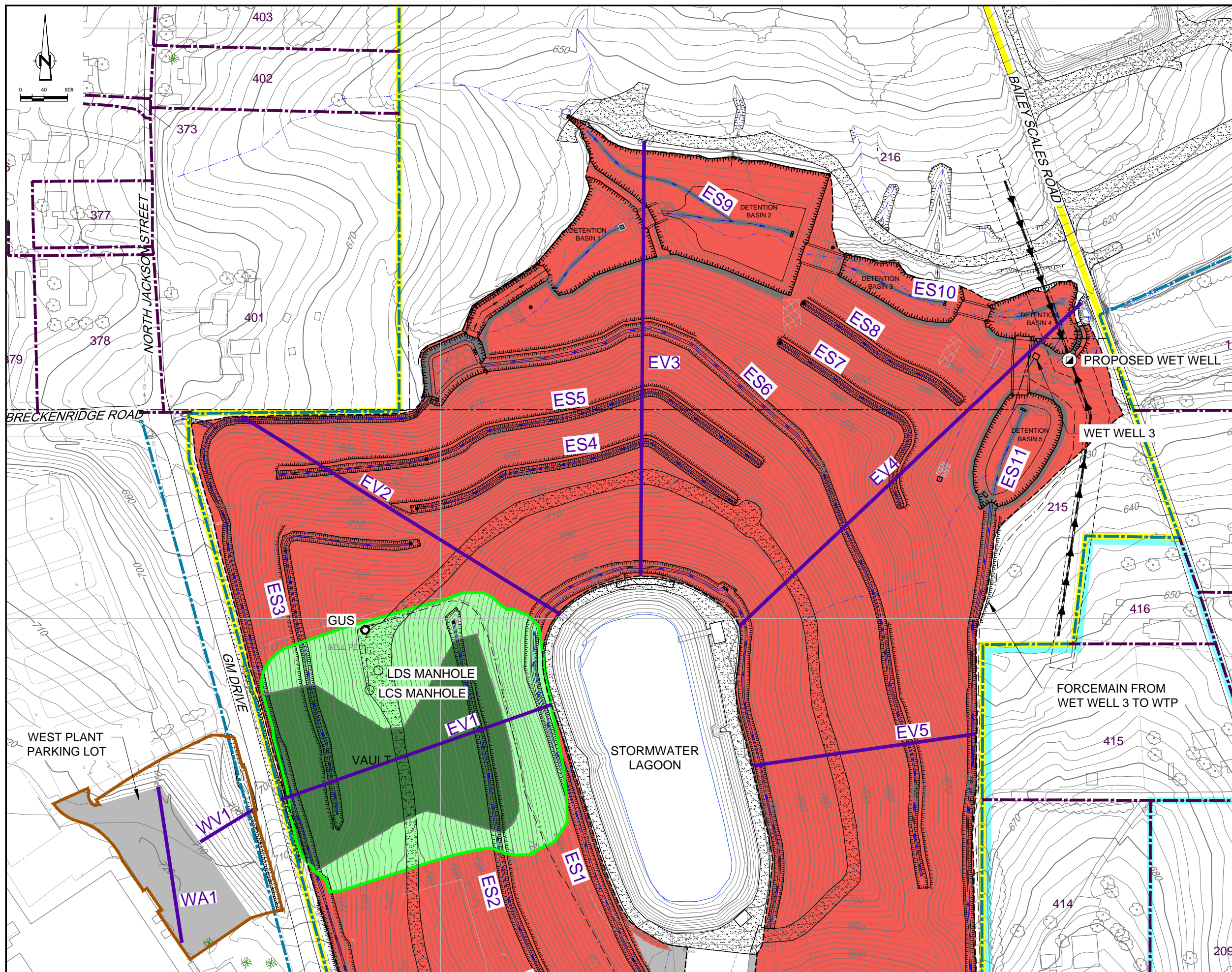
| ITEM                                      | TYPES OF PROBLEMS                                                                                               | CHECKED     |                            | DETAILED ACTIONS REQUIRED             | DATE AND NATURE OF ACTIONS COMPLETED |
|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------|-------------|----------------------------|---------------------------------------|--------------------------------------|
|                                           |                                                                                                                 | NO PROBLEMS | CORRECTIVE ACTION REQUIRED |                                       |                                      |
| <b>SWALE/DRAINAGE DITCHES (CONTINUED)</b> |                                                                                                                 |             |                            |                                       |                                      |
| <u>Transect ES7</u>                       | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                           | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                           | - OBSTRUCTIONS                                                                                                  | X           |                            |                                       |                                      |
|                                           | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X           |                            |                                       |                                      |
|                                           | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                           | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |
| <u>Transect ES8</u>                       | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                           | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                           | - OBSTRUCTIONS                                                                                                  | X           |                            |                                       |                                      |
|                                           | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X           |                            |                                       |                                      |
|                                           | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                           | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |
| <u>Transect ES9</u>                       | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X           |                            | heavy weed growth and some bare spots |                                      |
|                                           | - EROSION                                                                                                       | X           |                            |                                       |                                      |
|                                           | - OBSTRUCTIONS                                                                                                  | X           |                            |                                       |                                      |
|                                           | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X           |                            |                                       |                                      |
|                                           | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X           |                            |                                       |                                      |
|                                           | - ROOTING OF TREES                                                                                              | X           |                            |                                       |                                      |

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                                      | TYPES OF PROBLEMS    | CHECKED                                                                                                         |                            | DETAILED ACTIONS REQUIRED | DATE AND NATURE OF ACTIONS COMPLETED  |  |
|-------------------------------------------|----------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------|---------------------------------------|--|
|                                           |                      | NO PROBLEMS                                                                                                     | CORRECTIVE ACTION REQUIRED |                           |                                       |  |
| <b>SWALE/DRAINAGE DITCHES (CONTINUED)</b> |                      |                                                                                                                 |                            |                           |                                       |  |
|                                           | <u>Transect ES10</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                           |                      | - EROSION                                                                                                       | X                          |                           |                                       |  |
|                                           |                      | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |  |
|                                           |                      | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |  |
|                                           |                      | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                           |                      | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |
|                                           |                      |                                                                                                                 |                            |                           |                                       |  |
|                                           | <u>Transect ES11</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                           |                      | - EROSION                                                                                                       | X                          |                           |                                       |  |
|                                           |                      | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |  |
|                                           |                      | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |  |
|                                           |                      | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                           |                      | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |
|                                           |                      |                                                                                                                 |                            |                           |                                       |  |
|                                           | <u>Transect ES12</u> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |  |
|                                           |                      | - EROSION                                                                                                       | X                          |                           |                                       |  |
|                                           |                      | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |  |
|                                           |                      | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |  |
|                                           |                      | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |  |
|                                           |                      | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |  |
|                                           |                      |                                                                                                                 |                            |                           |                                       |  |

COVER SYSTEMS INSPECTION LOG  
 CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM  
 GM CET BEDFORD FACILITY  
 BEDFORD, INDIANA

| ITEM                                      | TYPES OF PROBLEMS    | CHECKED                                                                                                         |                            | DETAILED ACTIONS REQUIRED | DATE AND NATURE OF ACTIONS COMPLETED  |
|-------------------------------------------|----------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------|---------------------------|---------------------------------------|
|                                           |                      | NO PROBLEMS                                                                                                     | CORRECTIVE ACTION REQUIRED |                           |                                       |
| <b>SWALE/DRAINAGE DITCHES (CONTINUED)</b> |                      |                                                                                                                 |                            |                           |                                       |
|                                           | <b>Transect ES13</b> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |
|                                           |                      | - EROSION                                                                                                       | X                          |                           |                                       |
|                                           |                      | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |
|                                           |                      | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |
|                                           |                      | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |
|                                           |                      | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |
|                                           | <b>Transect ES13</b> | - QUALITY OF VEGETATIVE COVER<br>- LENGTH OF GRASS<br>- DEAD/DYING GRASS<br>- GRASS COVERAGE<br>- NOXIOUS WEEDS | X                          |                           | heavy weed growth and some bare spots |
|                                           |                      | - EROSION                                                                                                       | X                          |                           |                                       |
|                                           |                      | - OBSTRUCTIONS                                                                                                  | X                          |                           |                                       |
|                                           |                      | - CULVERT/CATCH BASIN<br>- OBSTRUCTIONS<br>- SEDIMENT ACCUMULATION                                              | X                          |                           |                                       |
|                                           |                      | - SIGNS OF BURROWING BY ANIMALS                                                                                 | X                          |                           |                                       |
|                                           |                      | - ROOTING OF TREES                                                                                              | X                          |                           |                                       |



**LEGEND**

- EXISTING GROUND SURFACE ELEVATION CONTOURS (feet AMSL)
- EXISTING VEGETATION
- EXISTING BUILDINGS
- EXISTING FENCE LINE
- EXISTING RAILROAD TRACKS
- EXISTING DIRT ROADS
- EXISTING ROADS / PAVED AREAS
- EXISTING ELECTRICAL POWER LINE
- EXISTING FORCEMAIN TO TREATMENT FACILITY
- EXISTING OVERHEAD ELECTRICAL POWER LINE
- APPROXIMATE SURFACE WATER LOCATION
- APPROXIMATE GM PROPERTY BOUNDARY
- APPROXIMATE PROPERTY BOUNDARY
- EXISTING STORM SEWER
- WEST PLANT COVER LIMIT
- VAULT LIMIT
- EAST PLANT COVER LIMIT
- DRAINAGE DITCH
- ASPHALT PAVEMENT AREA
- LOW FLOW CHANNEL
- EAST PLANT AREA
- GM LLC OWNED RESIDENTIAL
- EAST PLANT COVER SYSTEM
- FINAL VAULT COVER SYSTEM AT SURFACE
- FINAL VAULT COVER SYSTEM BURIED BY EAST PLANT AREA COVER SYSTEM
- GRAVEL BED
- PAVED COVER SURFACE
- PROPOSED PILOT TRENCH
- VAULT GROUNDWATER UNDERDRAIN SYSTEM SUMP
- LEAK DETECTION SYSTEM SUMP
- LEACHATE COLLECTION SYSTEM SUMP
- TRANSECT

**TRANSECT LABELING**

- E EAST PLANT COVER
- V VEGETATIVE COVER
- A ASPHALT COVER
- W WEST PLANT COVER
- S SWALE

**SCALE VERIFICATION**

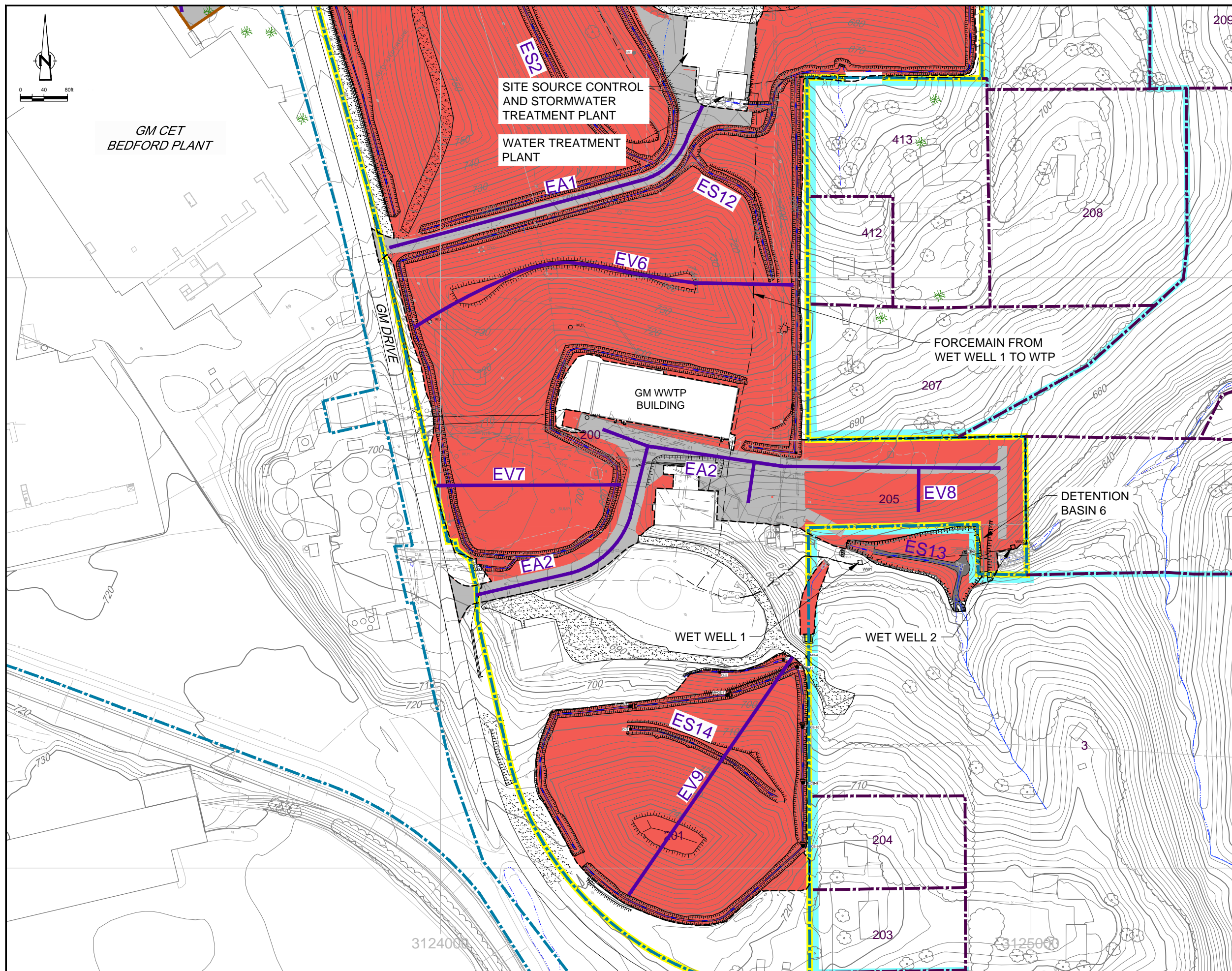
THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

**GM CET BEDFORD FACILITY  
BEDFORD, INDIANA**

INTERIM OPERATIONS, MAINTENANCE AND MONITORING PLAN  
EAST PLANT COVER SYSTEM  
**EAST PLANT COVER SYSTEM INSPECTIONS  
NORTHERN SECTION AND WEST PLANT  
COVER SYSTEM INSPECTIONS**



|                                                                                                                    |                         |                       |                           |
|--------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------------|---------------------------|
| Source Reference:<br>BASE MAP COMPLETED BY AIR-LAND SURVEYS, FLINT, MI, APRIL 2001<br>AND CRA SURVEYS 2002 TO 2008 |                         |                       |                           |
| Project Manager:<br>J.M.                                                                                           | Reviewed By:<br>P.G.    | Date:<br>October 2016 |                           |
| Scale:<br>1:80                                                                                                     | Project N°:<br>13968-00 | Report N°:<br>402     | Drawing N°:<br>figure D.1 |



**LEGEND**

- 810 — EXISTING GROUND SURFACE ELEVATION CONTOURS (feet AMSL)
- ☁ EXISTING VEGETATION
- ▭ EXISTING BUILDINGS
- - - EXISTING FENCE LINE
- +—+—+— EXISTING RAILROAD TRACKS
- - - - EXISTING DIRT ROADS
- +—+—+— EXISTING ROADS / PAVED AREAS
- - - E EXISTING ELECTRICAL POWER LINE
- - - F EXISTING FORCEMAIN TO TREATMENT FACILITY
- - - OE EXISTING OVERHEAD ELECTRICAL POWER LINE
- - - - - APPROXIMATE SURFACE WATER LOCATION
- +—+—+— (Blue) APPROXIMATE GM PROPERTY BOUNDARY
- +—+—+— (Purple) APPROXIMATE PROPERTY BOUNDARY
- STM — EXISTING STORM SEWER
- (Orange) WEST PLANT COVER LIMIT
- (Green) VAULT LIMIT
- (Black) EAST PLANT COVER LIMIT
- - - - DRAINAGE DITCH
- ▨ ASPHALT PAVEMENT AREA
- (Blue) LOW FLOW CHANNEL
- ▨ (Yellow) EAST PLANT AREA
- ▨ (Cyan) GM LLC OWNED RESIDENTIAL
- ▨ (Red) EAST PLANT COVER SYSTEM
- ▨ (Green) FINAL VAULT COVER SYSTEM AT SURFACE
- ▨ (Light Green) FINAL VAULT COVER SYSTEM BURIED BY EAST PLANT AREA COVER SYSTEM
- ▨ (Stippled) GRAVEL BED
- ▨ (Dotted) PAVED COVER SURFACE
- - - - PROPOSED PILOT TRENCH
- (Black) GUS
- (White) LDS
- (Grey) LCS
- (Purple) TRANSECT

**TRANSECT LABELING**

- E EAST PLANT COVER
- V VEGETATIVE COVER
- A ASPHALT COVER
- W WEST PLANT COVER
- S SWALE

**SCALE VERIFICATION**

THIS BAR MEASURES 1" ON ORIGINAL. ADJUST SCALE ACCORDINGLY.

**GM CET BEDFORD FACILITY  
BEDFORD, INDIANA**

INTERIM OPERATIONS, MAINTENANCE AND MONITORING PLAN  
EAST PLANT COVER SYSTEM

**EAST PLANT COVER SYSTEM INSPECTIONS  
SOUTHERN SECTION**

Source Reference:  
BASE MAP COMPLETED BY AIR-LAND SURVEYS, FLINT, MI, APRIL 2001  
AND CRA SURVEYS 2002 TO 2008

|                          |                         |                           |
|--------------------------|-------------------------|---------------------------|
| Project Manager:<br>J.M. | Reviewed By:<br>P.G.    | Date:<br>October 2016     |
| Scale:<br>1:80           | Project N°:<br>13968-00 | Report N°:<br>402         |
|                          |                         | Drawing N°:<br>figure D.2 |