

*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  
JANUARY/FEBRUARY 2011**

**March 14, 2011**

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## 1.0 INTRODUCTION

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

The next Progress Report, for the months of March/April 2011, will be submitted on or before May 15, 2011.

## 2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

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- An agreement between GM and MLC for GM to complete the remaining creek soil removal work on MLC property (Staging Area G Parcel 39) was previously signed and approved in early August 2010. The remaining small impacted area is present under the clay liner in the former Staging Area 'G'. The Downstream Parcels Removal Action Work Plan: Addendum No. 3, covering this remaining removal, was submitted to U.S. EPA on February 15, 2011. The Addendum summarized sample results for the additional boreholes installed at Staging Area 'G' from October through December 2010, and outlined a proposal to complete the excavation prescriptively, based on the significant amount of additional delineation sampling done late in 2010. The Addendum was tentatively approved pending minimal additional sampling to be completed in March 2011.
- Maintenance of storm water and erosion controls in this area continued on an as-needed basis.
- Spring 018 water continues to be collected and treated by SES's on-Site water treatment system. Sample results from SES's water treatment system during January/February 2011 are provided in Table 1.
- The property owners of Spring 18 were contacted to explain a proposed additional remedy in this area.
- Detailed design of the French-drain to divert clean water away from Spring 018, thereby reducing the volume of water produced by the Spring, commenced during this reporting period.
- Reports detailing monitoring completed in 2010 on the Upstream Parcels and Parcel 22 Removal Actions restorations were distributed to U.S. EPA on February 24, 2011.

- Conference calls were held on January 6 and 21 and February 3 and 15 with U.S. EPA and the Indiana Department of Environmental Management (IDEM) to discuss items related to the RA and the design and construction of the East Plant Area Interim Measures (IM).
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings were held on January 4, 11, 18, and 25 and on February 1, 8, 15, and 22. Tail gate safety meetings are held daily for both the consultant and the contractor.

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

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

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

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- The following is a list of anticipated work for the next reporting period:
  - Complete additional sampling required at Staging Area 'G' in order to obtain final approval on the plan to complete the prescriptive removal.
  - Once formal approval of the proposed work is obtained from U.S. EPA and IDEM, as part of the prescriptive removal, some of the clean clay liner in Staging Area G will be placed over the North Lawrence Water Corp water line to assist the water corporation in getting to and working on the line.
  - Continue to manage and treat storm water as needed, continue to collect and treat Spring 018 water, and continue maintenance of erosion controls.
  - Continue detailed design of Spring 018 groundwater diversion trench.
  - Some additional restoration work may commence on Parcel 36, in conjunction with the new owner's planting plans, once IDEM has approved a change to the planting plan previously submitted.

TABLE 1

**SES TREATMENT SYSTEM #1 SAMPLING RESULTS - JANUARY/FEBRUARY 2011**  
**GM CETC BEDFORD FACILITY**  
**BEDFORD, INDIANA**

<i>Sample Date</i>	<i>Analysis</i>	<i>Influent</i>	<i>After Sand Filter 1</i>	<i>After Sand Filter 2</i>	<i>Between Carbons 1 &amp; 3</i>	<i>Between Carbons 2 &amp; 4</i>	<i>Effluent</i>
1/4/2011	PCB (ug/L)	0.18	0.17	0.15	ND (0.10)	ND (0.10)	ND (0.10) / ND (0.10)
	Turbidity (NTU)	3.02	0.13	0.19	0.75	0.89	0.07 / 0.09
1/10/2011	PCB (ug/L)	ND (0.10)	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	1.50	--	--	--	0.45	0.19
1/18/2011	PCB (ug/L)	.29	--	--	--	ND (0.10)	ND (0.10) / ND (0.10)
	Turbidity (NTU)	0.95	--	--	--	0.77	0.08 / 0.10
1/25/2011	PCB (ug/L)	.16	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	0.20	--	--	--	0.17	0.00
2/3/2011	PCB (ug/L)	0.19 / 0.21	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	6.78 / 6.79	--	--	--	3.85	1.21
2/8/2011	PCB (ug/L)	0.2	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	3.41	--	--	--	0.80	0.05
2/16/2011	PCB (ug/L)	0.19 / 0.23	0.23	0.28	ND (0.10)	ND (0.10)	ND (0.10)
	Turbidity (NTU)	29.8 / 28.3	1.72	2.47	0.89	0.00	0.00
2/21/2011	PCB (ug/L)	0.2	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	11.70	--	--	--	0.00	0.00

## Note:

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

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

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**DELIVERABLES SUMMARY**

<i>Deliverable</i>	<i>Reference</i>	<i>Deadline</i>	<i>Deliverable Due Date</i>	<i>Status</i>
Final Parcel 22 Workplan	AOC IV.23; VIII.34.a	Approved July 23, 2003	July 23, 2003	complete
Final Upstream Workplan	AOC IV.25; VIII.34.b	Approved July 23, 2003	July 23, 2003	complete
Designation of Contractors and Project Coordinator	AOC VII.30; VII.31	CRA & McGuigan - Effective Date of Order Other contractors - 5 business days prior to commencement of work	July 31, 2003	complete
Contractor HASP	'U.S. EPA Approval Letter, July 23, 2003'	before work is to begins		complete
QAPP	AOC VIII.34.c; VIII.37.a	QAPP - 10 business days AED *	August 14, 2003	complete
OMMP	AOC VIII.38	OMMP - 30 business days after completion of each portion of Work in Paragraph 34. Final OMMP due with Final Report		
Downstream Workplan	AOC VIII.34.d; VIII.35.a	90 days AED	October 29, 2003	complete
Site Source Control Workplan	AOC VIII.34.e; VIII.35.a	Approved November 11, 2003	August 21, 2003	complete
Progress Reports	AOC VIII.39.a	1 <sup>st</sup> 30 days AED	August 30, 2003	complete
	U.S. EPA Approval Email, August 11, 2009	15 <sup>th</sup> of every other month thereafter	March 15, 2011	submitted March 14, 2011
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