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 NOVEMBER/DECEMBER 2011

January 13, 2012

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1.0 INTRODUCTION

This Progress Report covering activities completed in November and December 2011, 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 January/February 2012, will be submitted on or before March 15, 2012.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- Maintenance of storm water and erosion controls continued on an as-needed basis.
- Spring 018 water continued to be collected and treated by SES's on-Site water treatment system. Sample results from SES's water treatment system during November/December 2011 are provided in Table 1.
- A bedrock drilling program was initiated in October 2011 to install coreholes supporting the detailed design of the bedrock groundwater diversion trench. The bedrock diversion trench will divert clean groundwater away from Spring 018, thereby reducing the volume of water produced by Spring 018. Data collected from the new coreholes will be used to confirm the proposed trench alignment meets the design criteria for diverting clean water only. Drilling was completed in December 2011 and samples were collected from the new and old coreholes. Low level detections of PCBs were found in high flow water sampling in the new coreholes; GM is currently planning to resample during another high flow event as well as a low flow event to further evaluate these detections prior to finalizing the design.
- Restoration repairs north of Broomsage Road scheduled to be completed late last year were delayed due to weather.
- Continued work on the Downstream Parcels Construction Certification Report covering the excavation phase of the construction phase.
- The Document Repository at the Plant was disassembled during this reporting period. Copies of the documents have been put on CD and are available at the Bedford Public Library. The website will continue to be updated and can be accessed at: http://www.bedfordpowertraincorrectiveaction.com/
- Conference calls were held on November 10 and 29, 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).

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• On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings were held on November 1, 8, 15, 22, and 29; and December 6, 13, and 20. Tailgate safety meetings are held daily for both the consultant and the contractor.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

• Preliminary sample results from the coreholes at Spring 018 had low-level total PCB detections. Samples were collected after a period of heavy rainfall after the groundwater elevations rose approximately five feet over three days. Additional samples will be collected beginning in January to replicate these high-flow conditions (if possible) and to collect low-flow samples to help GM and CRA in assessing the validity of the design and in determining next steps and whether additional evaluation steps are required (e.g., more drilling for new trench alignment).

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Continue to collect and treat Spring 018 water, and continue maintenance of erosion controls as needed.
 - Complete additional sampling of the coreholes in the area of Spring 018 and re-evaluate the groundwater diversion trench alignment as necessary.
 - Continue work on the Downstream Parcels Construction Certification Report.
 - Complete restoration repairs on properties north of Broomsage Road in 2012, when weather permits.
 - Complete restoration design for remaining properties to the west of Peerless Road in cooperation with RACER Trust (formerly Motors Liquidation Company). Completion of restoration for GM LLC obligations and RACER Trust's respective properties is anticipated to be completed during the 2012 construction season.
 - The next Public and Community Liaison Panel (CLP) meetings will be held in 2012 after the restoration construction ramps up again in the late spring or early summer.

TABLE 1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - NOVEMBER/DECEMBER 2011
GM CETC BEDFORD FACILITY
BEDFORD, INDIANA

Sample Date	Analysis	Influent	After Sand Filter 1	After Sand Filter 2	Between Carbons 1 & 3	Between Carbons 2 & 4	Effluent
11/2/2011	PCB (ug/L) Turbidity (NTU)	0.070 J / 0.081 J 0.00 / 0.07	 		 	0.20 0.20	ND (0.19) 0.00
11/9/2011	PCB (ug/L) Turbidity (NTU)	0.069 J 0.85	0.062 J 1.88	ND (0.20) 0.07	ND (0.19) 0.00	ND (0.20) 0.29	ND (0.19) 0.09
11/16/2011	PCB (ug/L) Turbidity (NTU)	0.009 J / 0.10 J 4.32 / 4.33	 			0.068 J 0.66	ND (0.19) 0.23
11/21/2011	PCB (ug/L) Turbidity (NTU)	0.083 J 3.94	 			ND (0.19) 0.00	ND (0.19) 0.29
11/29/2011	PCB (ug/L) Turbidity (NTU)	0.2 13.80	 			ND (0.19) 0.42	ND (0.19) 0.23
12/6/2011	PCB (ug/L) Turbidity (NTU)	ND (0.19) 24.40	 		 	0.24 4.31	ND (0.19) / ND (0.19) 2.31 / 2.31
12/14/2011	PCB (ug/L) Turbidity (NTU)	0.097 J 5.69	0.077 J / 0.12 J 2.77 / 2.73	0.11 J 2.77	ND (0.20) 0.20	ND (0.19) 0.34	ND (0.20) 0.00
12/21/2011	PCB (ug/L) Turbidity (NTU)	0.096 J 13.80	 			ND (0.20) 1.73	ND (0.19) 0.40
12/28/2011	PCB (ug/L) Turbidity (NTU)	0.097 J 5.92	 			ND (0.19) 1.06	ND (0.19) 0.17

Note:

J - Estimated Value

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

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DELIVERABLES SUMMARY

Deliverable	Reference	Deadline	Deliverable Due Date	Status
Final Parcel 22 Workplan	AOC IV.23; VIII.34.a	Approved July 23, 2003	July 23, 2003	complete
Final Upstream Workplan	AOC IV.25; VIII.34.b	Approved July 23, 2003	July 23, 2003	complete
Designation of Contractors and Project Coordinator	AOC VII.30; VII.31	CRA & McGuigan – Effective Date of Order Other contractors – 5 business days prior to commencement of work	July 31, 2003	complete
Contractor HASP	'U.S. EPA Approval Letter, July 23, 2003'	before work is to begins		complete
QAPP	AOC VIII.34.c; VIII.37.a	QAPP - 10 business days AED *	August 14, 2003	complete
OMMP	AOC VIII.38	OMMP - 30 business days after completion of each portion of Work in Paragraph 34. Final OMMP due with Final Report		
Downstream Workplan	AOC VIII.34.d; VIII.35.a	90 days AED	October 29, 2003	complete
Site Source Control Workplan	AOC VIII.34.e; VIII.35.a	Approved November 11, 2003	August 21, 2003	complete
Progress Reports	AOC VIII.39.a U.S. EPA Approval Email, August 11, 2009	1 st 30 days AED 15 th of every other month thereafter	August 30, 2003 January 15, 2012	complete submitted January 13, 2012
Final Report	AOC VIII.40	Within 90 days after required info is received and work completed		

Note:

AED = After Effective Date of Administrative Order on Consent