

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
March/April 2012**

May 15, 2012



**CONESTOGA-ROVERS
& ASSOCIATES**

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May 15, 2012

Reference No. 013968

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

Dear Mr. Stimple:

Re: Submittal of March/April 2012 Progress Report
Administrative Order on Consent for Removal Action
Docket No. V-W-'03-C-747
GM CETC - Bedford Facility
Bedford, Indiana

Consistent with the submittal requirements of Section VIII, Paragraph 39a of the Administrative Order on Consent (AOC), effective July 31, 2003, please find attached one copy of the April/May 2012 Progress Report for the above referenced Site.

The next Progress Report, covering May/June 2012, will be submitted on or before July 15, 2012.

Should you have any questions regarding this document, please do not hesitate to contact me at (708) 476-4793 or Cheryl Hiatt at (313) 510-4328.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



FOR J.M.

James J. McGuigan, P.E.

PG/jh/129
Encl.

c.c.: see Distribution List (attached)

GM Bedford Distribution List

Brad Stimple	U.S. EPA, OSC
Peter Ramanauskas	U.S. EPA, Region 5
Gerald O'Callaghan	IDEM Management
Jim Smith	IDEM
Carl Wodrich	IDNR
Cheryl Hiatt/Ed Peterson	GM WFG Remediation
James McGuigan	CRA Project Manager
Bill Steinmann	CRA Project Geologist
Katie Kamm	CRA Oversight Engineer
Denise Heckler	TestAmerica - North Canton
Chris Kovitch	TestAmerica - Pittsburgh
Stephen Song	ENVIRON

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1.0 INTRODUCTION

This Progress Report covering activities completed in March and April 2012, is submitted in accordance with the ADMINISTRATIVE ORDER ON CONSENT (AOC) FOR REMOVAL ACTION Proceeding Under Sections 104, 106(a), 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. SS 9604, 9606(a), 9607, and 9622 (United States Environmental Protection Agency (U.S. EPA) Docket No.: V-W-03-C-747) effective July 31, 2003, and with the reporting modification approved August 11, 2009, to submit CERCLA Progress Reports bi-monthly.

The next Progress Report, for the months of May/June 2012, will be submitted on or before July 15, 2012.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- Maintenance of storm water and erosion controls continued on an as-needed basis.
- Spring 018 water continued to be collected and treated by SES's on-Site water treatment system. U.S. EPA granted approval of a request to reduce the sampling frequency to bi-monthly on March 23, 2012. The first sampling under the new schedule was completed in April, and the next sample will be collected in June. Sample results from SES's water treatment system during March/April 2012 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 east of Spring 018. The purpose of a bedrock diversion trench would be to divert clean groundwater away from Spring 018, reducing the volume of water produced by Spring 018, and thereby reducing the volume of water that needs to be treated. Drilling was completed in December 2011 and samples were collected from the new coreholes as well as coreholes previously installed as part of the initial Spring 018 investigation. Low level detections of PCBs were found in water samples collected from the new coreholes. GM re-sampled the coreholes on January 25th and 26th, 2012 to confirm the previous detections. Sample results figures and tables for the December 2011 and January 2012 sampling events were submitted to U.S. EPA on February 22, 2012. GM is reviewing the sampling results and is now evaluating additional remedial alternatives for the Spring 018 area. Spring 018 water continues to be collected and treated while the evaluation is ongoing. Currently GM is sampling the spring weekly as part of an evaluation program.
- Restoration repairs to properties north of Broomsage Road were completed in April. Removal of a certain number of logs from Parcel 30 will be scheduled for this summer during drier weather per the owner's request.

- The Document Repository at the Plant has been disassembled. Copies of the documents have been put on CD and are available at the Bedford Public Library. CDs will be periodically updated as new documents become available. The website will also continue to be updated and can be accessed at:
<http://www.bedfordpowertraincorrectiveaction.com>.
- Conference calls were held on March 8 and 22 and April 5, 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).
- Representatives from GM, U.S. EPA, IDEM, and CRA met on April 26, in Bedford, Indiana for the 2012 Annual Project Status Meeting. The meeting reviewed tasks completed in the last year and the proposed schedule of completion for tasks this year.
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. During this maintenance period, formal SES construction meetings were held on March 13 and April 10. Tailgate safety meetings are held daily for both the consultant and the contractor.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- Preliminary sample results from the coreholes, installed along the proposed clean-water diversion trench at Spring 018 in December 2011, had low-level total PCB detections. Samples were collected after a period of heavy rainfall during which time the groundwater elevations rose approximately five feet over three days. Additional samples were collected in January, under medium to high-flow conditions. Sample results from the January sampling event also had low-level total PCB detections. GM is reviewing additional evaluation steps and possible additional design alternatives. A meeting to discuss Spring 018 with U.S. EPA and IDEM has been scheduled for May 31, 2012.

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.
 - Sample SES's on-Site water treatment plant in June in accordance with the bi-monthly monitoring schedule.
 - Continue Spring 018 remedy requirement evaluation, and conduct Spring 018 meeting with U.S. EPA and IDEM on May 31, 2012.
 - Complete restoration design for the two remaining properties west of Peerless Road that GM LLC is responsible for. Restoration design will be completed in cooperation with RACER Trust, who owns two of the other properties upstream to the east. Completion of restoration for GM LLC obligations is anticipated to be completed during the 2012 construction season.
 - Complete removal of logs from property north of Broomsage Road.
 - Complete inspection of restoration for a parcel south of Broomsage Road.
 - Conduct Public and Community Liaison Panel (CLP) meetings in June 2012 on a date to-be-determined.
 - Conduct an updated presentation for the local realtors to provide updates on the status of the creek cleanup and restoration on May 21, 2012.

TABLE 1

**SES TREATMENT SYSTEM #1 SAMPLING RESULTS - JANUARY/FEBRUARY 2012
GM CETC BEDFORD FACILITY
BEDFORD, INDIANA**

<i>Sample Date</i>	<i>Analysis</i>	<i>Influent</i>	<i>After Sand Filter 1</i>	<i>After Sand Filter 2</i>	<i>Between Carbons 1 & 3</i>	<i>Between Carbons 2 & 4</i>	<i>Effluent</i>
3/7/2012	PCB (ug/L)	ND (0.20)	ND (0.19)	ND (0.20)	ND (0.19)	ND (0.20)	ND (0.20)
	Turbidity (NTU)	5.40	3.00	3.59	0.34	2.52	0.09
3/14/2012	PCB (ug/L)	0.072 J	--	--	--	ND (0.19)	ND (0.19)
	Turbidity (NTU)	6.82	--	--	--	1.42	0.80
4/18/2012	PCB (ug/L)	ND (0.19)	ND (0.20)	ND (0.19)	ND (0.20) / ND (0.19)	ND (0.19)	ND (0.19)
	Turbidity (NTU)	1.71	2.83	1.21	0.52/0.55	2.13	0.16

Note:

J - Estimated Value

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

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