RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #19 FOURTH QUARTER 2005

GM POWERTRAIN – BEDFORD FACILITY 105 GM DRIVE BEDFORD, INDIANA

EPA ID# IND006036099

Prepared For: General Motors Corporation

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QUARTERLY PROGRESS REPORT DISTRIBUTION LIST

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1.0 INTRODUCTION

This Quarterly Progress Report is submitted in accordance with the Bedford Performance-Based Corrective Action Agreement (Agreement) between the United States Environmental Protection Agency (U.S. EPA) and General Motors Corporation (GM), executed on March 20, 2001, and modified on October 1, 2002. This report covers the period of the fourth calendar quarter of 2005 for the GM Powertrain – Bedford Facility (Facility), Bedford, Indiana. Some of the activities conducted as part of the overall Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) work are being addressed under the CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) Removal Action Program, pursuant to the Administrative Order on Consent (AOC) between the U.S. EPA and GM (effective July 31, 2003). These activities are described in more detail within the CERCLA Monthly Progress Reports referred to herein.

The next quarterly progress report, covering the First Quarter 2006, will be submitted on or before April 15, 2006.

2.0 <u>LIST OF COMPLETED ACTIVITIES</u>

The following documents were prepared and distributed during this quarter:

- GM and its contractors (Sevenson Environmental Services (SES) and ENTACT) met with the U.S. EPA on-Site on October 5, 2005;
- Conference calls were held with the U.S. EPA, Indiana Department of Environmental Management (IDEM), the Agency for Toxic Substance and Disease Registry (ATSDR) and Indiana State Department of Health (ISDH) on October 11, 25, and 31, 2005, November 15, and 29, 2005, December 13, 2005 to discuss project progress (United States Fish and Wildlife Service (USFWS) was also invited to attend the update calls);
- A meeting with the U.S. EPA and IDEM was held in Chicago on October 18, 2005, to discuss the East Plant Area Interim Measure (IM);
- U.S. EPA approved an extension to hold <50 mg/kg PCB waste in Grading Area 2 to up to March 30, 2006;
- Design of the East Plant Area Over 50 mg/kg Removal was submitted to the U.S. EPA on October 7, 2005. Comments from the U.S. EPA were received December 8, 2005 and GM will submit responses to those comments in January 2006;
- Preliminary East Plant Area Grading Area 2 Soil Sample Data were submitted on October 14, 2005;
- The eighteenth Quarterly Progress Report covering the third quarter 2005 was submitted October 14, 2005;
- East Plant Area Vault Construction Design Report was submitted to the U.S. EPA on October 17, 2005. This work was awarded to Sevenson Environmental Services (SES). Response to U.S. EPA comments on the East Plant Area Vault Design were submitted to the U.S. EPA on November 28, 2006. Portions of the work plan have been approved by the U.S. EPA:
 - The U.S. EPA approved rock breaking activities for the vault construction on October 18, 2005,
 - The U.S. EPA approved construction of the underdrain system on October 31, 2005,
 - The U.S. EPA approved construction of the bottom liner (including, fabric, clay and FML) on November 29, 2005, and

- Photographs of the vault underdrain construction were submitted to the U.S. EPA on December 3, 2006 and photographs of the vault construction progress were submitted to the U.S. EPA on December 22, 2005;
- Drilling for the final two monitoring well locations, proposed under the RCRA Facility Investigation (RFI) Work Plan Addendum No. 11, was initiated on November 17, 2005;
- Site Source Control (SSC) sampling (conducted under the Administration Order On Consent (AOC)) of the seeps and springs was conducted beginning November 21, 2005, in fulfillment of the Third Quarter 2005 High-Flow Sampling Event. Also, SSC sampling (conducted under the AOC) of the seeps and springs was conducted beginning December 27, 2005, in fulfillment of the Fourth Quarter 2005 Low-Flow Sampling Event;
- Western Tributary IM Work Plan and Draft Northern Tributary IM Work Plan were submitted for review November 29, 2005. Comments from the U.S. EPA were received December 7, 2005. Verbal responses were given during the December 13, 2005 conference call. Revised reports will be submitted in January 2006;
- The U.S. EPA approved SSC East Plant Area Springs I, J, K, L, M, and Spring NAOI4/P401 collection system dated August 30, 2005, on November 29, 2005:
 - Installation of controls for Springs I, J, K, L and M have been initiated and will permanently tied into the new water treatment system upon the completion of that system. Currently water is collected and treated at SES' temporary water treatment system,
 - Implementation of controls for Spring NAOI4/P401 have been initiated with GM's contractor, SES;
- RCRA Facility Investigation (RFI): Addendum No. 12 regarding further delineation of the stratigraphy along the proposed bedrock trench alignment was submitted to the U.S. EPA on December 6, 2005:
 - Field activities were initiated under the RFI Work Plan Addendum No. 12 on December 14, 2005, and
 - A response to U.S. EPA comments will be submitted in January 2006;
- A response to the U.S. EPA comments on the Area of Interest (AOI) 4 and Outfall 002 dye trace data was submitted to the U.S. EPA on December 6, 2005; and
- In an email sent December 14, 2005, the U.S. EPA requested that GM evaluate the feasibility of using heat enhanced vacuum recovery/vapor extraction technology for the AOI 8 extraction system.

GM also continued to evaluate specific sampling requests made by residents in this quarter and collected samples, where appropriate, based on knowledge and location of the property relative to the plant and/or contamination. These analytical results (once validated) have been included in the stream project data packages distributed to the residents, and to U.S. EPA and IDEM. GM will continue evaluating additional areas requested by residents, and sampling, as appropriate, on a case-by-case basis, during the next reporting period

The September 2005, October 2005, and November 2005 CERCLA Removal Action Monthly Progress Reports were submitted during the 3rd quarter of 2005.

3.0 SUMMARIES OF ALL CHANGES MADE IN THE CORRECTIVE ACTION (CA) DURING THE REPORTING PERIOD

The following changes were made to the CA during the reporting period:

- Submission of the Design of the East Plant Area Excavation of Greater Than 50 ppm Material Design Work Plan;
- Submission of the eighteenth Quarterly Progress Report covering the third calendar quarter 2005;
- Submission of Preliminary East Plant Area Grading Area 2 Soil Sample Data;
- Submission of the East Plant Area Vault Construction Design Report;
- Submission of the Response to U.S. EPA Comments on the East Plant Area Vault Construction Design Report;
- Photographs of the Vault Construction were submitted December 7, 2005 and December 22, 2005;
- Placement of the gravel underdrain system and the clay base for the proposed vault at AOI 7;
- Submission of Western Tributary IM and Draft Northern Tributary IM Work Plans for review;
- Submission of RFI Addendum No. 12 for review;
- An email response was submitted to the U.S. EPA comments on the AOI 4 and Outfall 002 dye trace; and
- Expansion of Grading Area 2 was completed and filling of < 50 mg/kg PCB soil from the creek excavation is ongoing.

4.0 <u>COMMUNITY RELATIONS</u>

GM continues to maintain the toll free information telephone number. Individual meetings continue to be arranged to discuss sampling results with individual residents as requested.

Quarterly meetings to review project status, are held both with the neighbors along the creek and around the plant, as well as with the general public. Quarterly meetings were held during this reporting period on October 5 and 6, 2005, at the Facility. The October 5, 2005 meeting with residents along the creek was held from 6:30 PM to 8:00 PM at the Bedford Facility as a regular information session with presentation. The October 6, 2005, meeting took place outside on the Facility Parking Lot throughout the day with an information booth, food, activities for the children, and tours of the project. The next quarterly meeting is scheduled to occur February 2, 2006. It will be a hybrid of the traditional presentation format and the availability session format. Presentations for the meetings are posted on the web site at <u>www.BedfordPowertrainCorrectiveAction.com</u>.

Fact Sheet 13 will be issued during January 2006.

A CLP meeting occurred in this quarter on December 2, 2005. The next regularly scheduled meeting with the Community Liaison Panel (CLP) is scheduled for February 3, 2006. The CLP was formed to provide additional communication avenues for the community and the meetings are currently being held at the GM Facility approximately every three months or more frequently if information on the project changes significantly. The CLP meeting minutes are posted on the GM website at www.BedfordPowertrainCorrectiveAction.com.

The Information Center, located at the plant lobby, is available by appointment through Ms. Becki Akers, GM Communications, at the project toll free number 866-223-0856. The repository located at the Bedford Public Library remains open at normal business hours. All data in the repository are also located on the aforementioned web site.

5.0 <u>CHANGES IN PERSONNEL DURING THE REPORTING PERIOD</u>

Russell Aylsworth has taken over day-to-day duties of CRA's Safety Oversite for the project under the supervision of Jeff Maranciak from Brian Stewart. Also a number of field personnel have been rotated out of the field activities.

6.0 **PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

Work projected for the next reporting period includes:

- Conduct a neighborhood meeting February 1, 2006;
- Conduct a general public information session in February 2, 2006;
- Conduct a Community Liaison Panel Meeting February 3, 2006;
- Prepare and distribute Fact Sheet 13 in January 2006;
- Continue with Removal Action activities in the upstream and downstream parcels;
- Continue monthly monitoring of groundwater elevation measurements;
- Continue the evaluation of RFI soil and groundwater data;
- Continue work on an IM Work Plan for the Plant property areas west of GM Drive;
- Submit the final IM Work Plan for the Northern Tributary to the U.S. EPA;
- Continue work outlined in RFI Work Plan: Addendum No. 8 for the additional dye trace studies in the AOI 4 and AOI 6 areas in support of the East Plant Area IM;
- Submit the report for RFI Work Plan: Addendum No. 9;
- Submit the report for RFI Work Plan: Addendum No. 10;
- Continue work outlined in RFI Work Plan: Addendum No. 12 and respond to U.S. EPA comments in January 2006;
- Implement Final (100%) East Plant Area Excavation of Greater Than 50 ppm PCB Material Design Work Plan as soon as the construction of the vault is complete;
- Submit Final (100%) East Plant Area Cover System Design to the U.S. EPA review and implement as soon as practical upon approval;
- Submit a proposal for construction of East Plant Area Grading Areas 3 and 4;
- Complete Pre-final (95%) East Plant Area Trench Design and submit for U.S. EPA review;
- Submit a design for the Source Removal System on AOI 8; and
- Continuation of placement of the < 50 mg/kg PCB Removal Action soils in the East Plant Area as grading fill. Begin fill placement into the > 50 mg/kg PCB soil excavations upon approval. Commence placement as grading fill for the East Plant Area Cover System once approved.

7.0 COPIES OF DAILY REPORTS, INSPECTION REPORTS, LABORATORY/MONITORING DATA

Packages of analytical data from any sampling activity have been submitted as they become available, after validation, under separate cover, and will continue to be submitted during the next reporting period.