

GENERAL MOTORS CORPORATION

**GM POWERTRAIN 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*

MONTHLY PROGRESS REPORT - DECEMBER 2008

January 14, 2009

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1.0 INTRODUCTION

This Monthly 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.

The next Monthly Progress Report, for the month of January 2009, will be submitted on or before February 15, 2009.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS MONTH

- Additional work along the stream channel to remove impacted soil and sediment from the creek channel and floodplain did not take place in December 2008 and no verification samples were collected during this reporting period. Two small sections to be excavated remain under the staging pile and the water treatment plant on Bud Ikerd Road. Excavation and verification sampling will resume when the soil pile and water treatment plant have been removed and as weather conditions allow. This is likely to occur in June 2009 after the spring rainy season is over.
- No <50 mg/kg PCB material was moved from Staging Area G to the East Plant Area in December 2008.
- No <50 mg/kg PCB tree stump and associated soil material was disposed of at the Sycamore Ridge Landfill in Terra Haute, Indiana in December 2008.
- A summary of PCB soil disposal to date is presented in Table 1.1.
- A Site Source Control (SSC) Seep and Spring Monitoring Event was conducted on December 29.
- Water within the remediation areas was collected and treated by Severson Environmental Services' (SES's) on-site water treatment systems. U.S. EPA has approved direct discharge of treated water from SES's treatment systems at Parcel 216 Staging Area. ENTACT's treatment system is being disassembled and was not run during December 2008. Water treatment sample results for SES's treatment systems from December 2008 are provided in Tables 2.1 and 2.2.
- Operation of Borrow Area 39-1 continued.
- Conference calls were held on December 5 and 17, 2008, with U.S. EPA, Agency for Toxic Substance and Disease Registry (ATSDR), the Indiana Department of Environmental Management (IDEM), and the Indiana State Department of Health (ISDH) to discuss items

related to the RA and the design and construction of the East Plant Area Interim Measures (IM). The United States Fish and Wildlife Service (USFWS) was also invited to the call.

- On-Site construction meetings for the reporting period have been held informally daily and formally weekly. Meetings with SES for remediation and restoration work are each generally held on Wednesdays. SES remediation meetings were held on December 3, 10, 18, and 22, 2008. SES restoration meetings were held on December 3, 10, and 17, 2008. Meetings with ENTACT are held generally on Thursdays. The ENTACT meetings were held on December 4, 11, and 18, 2008.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- A report summarizing SSC: Addendum No. 5 investigation results and the Proposed Spring 018 Remedial Approach was submitted to U.S. EPA in November 2008. This spring water is currently captured and treated before entering the creek.
- Creek soil excavation and transportation will not occur over the winter months, as there is great difficulty placing soil and clay over soil in winter weather. In addition, water management is more difficult on open fill areas in winter. Open areas will be covered both in the Creek area and the East Plant Area and soil erosion controls will be maintained over the winter. Operators are currently preparing open excavation areas and soil piles for the winter shutdown by covering them with a temporary liner. It is anticipated that soil work will resume in June 2009 after the spring rainy season is over.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Complete dismantling the water treatment plant on Parcel 36 at Bud Ikerd Road and replace with a portable treatment plant;
 - Continue operation of Borrow Area 39-1 and preparation of Borrow Area 39-7 as long as material is needed and weather permits. Prepare Borrow Areas for winter closure; and
 - Complete and maintain temporary liners within excavations and soil pile areas as required.

TABLE 1.1

DISPOSAL SUMMARY OF PCB WASTE MATERIAL - DECEMBER 2008
GM POWERTRAIN BEDFORD FACILITY
BEDFORD, INDIANA

	<i>Monthly Total</i> <i>(tons)</i>	<i>Total to Date</i> <i>(tons)</i>
Soil \geq 50 mg/kg (Heritage Environmental Services)	0	319,776
Soil <50 mg/kg (Republic-Sycamore Ridge)	0	54,952
Soil <50 mg/kg (East Plant Grading Areas)	0	1,187,160
Total Volume Disposed	0	1,551,512

TABLE 2.1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - DECEMBER 2008
GM POWERTRAIN 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>After Carbons</i>	<i>Effluent (after bag filters)</i>
12/4/2008	PCB (ug/L)	--	--	--	--	--	--	ND(0.073)
	Turbidity (NTU)	--	--	--	--	--	--	1.00

Notes:

J - Estimated result. Results is less than the reporting limit.

ND - Non detect

"--" - Not Sampled

TABLE 2.2

SES TREATMENT SYSTEM #2 SAMPLING RESULTS - DECEMBER 2008
GM POWERTRAIN BEDFORD FACILITY
BEDFORD, INDIANA

<i>Sample Date</i>	<i>Analysis</i>	<i>Influent</i>	<i>Between Carbons 1 & 3</i>	<i>Between Carbons 2 & 4</i>	<i>Sandfilter Train 3 Effluent Process</i>	<i>Sandfilter Train 2 Effluent Process</i>	<i>Sandfilter Train 1 Effluent Process</i>	<i>Effluent (after bag filters)</i>
12/4/2008	PCB (ug/L)	0.19J	ND (.073)	ND (.073)	--	--	--	0.067J
	Turbidity (NTU)	13.40	3.78	17.30	--	--	--	2.90
12/4/2008	PCB (ug/L)	--	--	--	--	--	--	ND (.073)
	Turbidity (NTU)	--	--	--	--	--	--	0.90
12/9/2008	PCB (ug/L)	0.25	ND (0.20)	0.69 J	--	0.46	0.32	ND (0.20)
	Turbidity (NTU)	12.70	1.41	23.60	--	3.4	2.77	1.00
12/31/2008	PCB (ug/L)	ND (0.2)	ND (0.20)	--	--	--	--	ND (0.20)
	Turbidity (NTU)	31.4	6.4	--	--	--	--	2.01 / 2.04

Notes:

J - Estimated result. Results is less than the reporting limit.

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
Monthly Progress Reports	AOC VIII.39.a	1 st 30 days AED 15 th of each month thereafter	August 30, 2003 January 15, 2009	complete submitted January 14, 2009
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