GENERAL MOTORS COMPANY

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

<u>CERCLA PROGRESS REPORT</u> <u>MAY/JUNE 2010</u>

July 15, 2010

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1.0 INTRODUCTION

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 July/August 2010, will be submitted on or before September 15, 2010.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- The remaining Downstream Parcels field activities have been on hold while General Motors LLC (GM) and Motors Liquidation Company (MLC) finalize negotiations to complete the remaining creek soil removal work on Parcel 39. An agreement between GM and MLC for GM to complete the remaining removal work is anticipated to be completed in early July, pending bankruptcy court approval. GM is currently proceeding with preliminary scheduling for Sevenson Environmental Services (SES) to begin transporting the impacted materials from the soil stockpile at Staging Area G to the East Plant Area. Once the soil staging stockpile at Area 'G' is transported, the area under the soil pile can be excavated.
- No material excavation or hauling was conducted during May/June 2010. A summary of PCB soil disposal to date is presented in Table 1.1.
- Spring 018 water continues to be collected and treated by SES's on-Site water treatment system. U.S. EPA has approved direct discharge of treated water from SES's treatment systems at the Parcel 216 Staging Area. Sample results from SES's water treatment system during May/June 2010 are provided on Table 2.1.
- A proposed final sample was collected from the remaining spring in GM's SSC Seep and Spring Monitoring Program at Spring Well 1. The location had been dry when checked previously but started flowing during recent rain events. GM will submit validated sample results when they are available.
- A request was submitted to U.S. EPA on June 14 requesting a reduction of the sampling frequency at Spring 018 from the current monthly schedule to a quarterly schedule.

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- The Construction Certification Report and Interim Operation, Maintenance and Monitoring plan for the Parcel 22 RA and the Construction Certification Report for the Parcels 201 and 204 IM were submitted to U.S. EPA in May 2010.
- Conference calls were held on May 13 and 27, and June 10 and 24 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).
- Resident and Public Meetings and the CLP Meeting for the 2010 Second Quarter were held on June 17-18, 2010.
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings were held on May 11, 18, and 25 and on June 1, 8, 15, 22, and 29.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

The remaining excavation of creek and floodplain soils on Parcel 39A beneath the Staging Area G soil stockpile can not begin until an agreement between GM and MLC for the remaining excavation work under the Order is complete. This agreement will require approval of the bankruptcy court prior to finalization.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Completion of agreement with MLC for properties owned by MLC in order to conduct work on the MLC property Parcel 39A.
 - Mobilization to the Parcel 39 Work Area and commencement of remaining removal activities.
 - Minimize erosion in areas not covered with temporary liners.
 - Manage and treat storm water as needed.
 - Continue to collect and treat Spring 018 water in the SES temporary treatment system.

TABLE 1.1

DISPOSAL SUMMARY OF PCB WASTE MATERIAL - MAY/JUNE 2010 GM CETC BEDFORD FACILITY BEDFORD, INDIANA

	Total ⁽²⁾ (tons)	Total to Date (tons)
Soil ≥50 mg/kg (Heritage Environmental Services)	0	319,912
Soil <50 mg/kg (Republic-Sycamore Ridge)	0	55,666
Soil <50 mg/kg (East Plant Grading Areas)	0	1,190,934
Soil ≥50 mg/kg (East Plant Area Vault - RCRA sources) ⁽¹⁾	0	187,078
Soil <50 mg/kg (East Plant Area Vault - RCRA sources) ⁽¹⁾	0	1,456
Total Volume Disposed	0	1,755,047

Note:

Estimated from volume calculated using pre- and post-filling surveys of the vault. Conversion factor used was 1.4 tons per cubic yard.

⁽²⁾ Based on estimated tonnage per truck of 20.4 tons

TABLE 2.1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - MAY/JUNE 2010

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
5/5/2010	PCB (ug/L)	ND (0.10)	0.15	ND (0.10)	ND (0.10)	ND (0.10) / ND (0.10)	ND (0.10)
	Turbidity (NTU)	3.05	2.97	1.64	0.70	0.15 / 0.18	0.28
5/11/2010	PCB (ug/L)	0.22				ND (0.10)	ND (0.10)
	Turbidity (NTU)	12.90				1.06	0.00
5/17/2010	PCB (ug/L)	0.23				ND (0.10) / ND (0.10)	ND (0.10)
	Turbidity (NTU)	4.17				0.06 / 0.06	0.24
5/26/2010	PCB (ug/L)	0.22				ND (0.10)	ND (0.10)
	Turbidity (NTU)	8.94				10.96	1.75
6/3/2010	PCB (ug/L)	0.27	0.17	0.26	ND (0.10)	ND (0.10) / ND (0.10)	ND (0.10)
	Turbidity (NTU)	19.40	5.83	24.90	0.93	0.60 / 0.52	0.00
6/8/2010	PCB (ug/L)	ND (0.10)				ND (0.10)	ND (0.10)
	Turbidity (NTU)	9.15				1.27	0.57
6/16/2010	PCB (ug/L)	0.28				ND (0.10)	ND (0.10)
	Turbidity (NTU)	13.10				0.50	0.00
6/23/2010	PCB (ug/L)	ND (0.10)				ND (0.10)	ND (0.10)
	Turbidity (NTU)	3.47				0.16	0.00
6/28/2010	PCB (ug/L)	0.19				ND (0.10) / ND (0.10)	ND (0.10)
	Turbidity (NTU)	21.40				0.80 / 0.82	0.80

Note:

ND - Non detect

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

[&]quot;--" - 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
	AOC VIII.39.a	1 st 30 days AED	August 30, 2003	complete
Progress Reports	U.S. EPA Approval Email, August 11, 2009	15 th of every other month thereafter	July 15, 2010	submitted July 15, 2010
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