

*GENERAL MOTORS COMPANY*

**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*

**CERCLA PROGRESS REPORT  
SEPTEMBER/OCTOBER 2009**

**November 13, 2009**

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## 1.0 INTRODUCTION

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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 November/December 2009, will be submitted on or before January 15, 2010.

## 2.0 SIGNIFICANT DEVELOPMENTS IN THIS MONTH

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- Field activities have been significantly curtailed due to negotiations between General Motors Company (GM) and Motors Liquidation Company (MLC) to complete remaining work within the MLC owned Downstream Parcels cooperatively. Severson Environmental Services (SES) has been selected to conduct the remaining work. Two small sections to be excavated remain under the soil staging pile at Area 'G' and the former water treatment plant on Bud Ikerd Road. One additional small area of soil to be excavated is located near the end of Pleasant Run Creek. No material excavation or hauling was conducted during September/October 2009. 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 systems. 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 September/October 2009 are provided on Table 2.1.
- Borrow Area 39-1 operation has been halted until field activities require additional clean soil and after evaluation of future cost effectiveness.
- Conference calls were held on September 10 and 22 and October 8 and 22 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).
- Mobilization of contractor (SES) to the Site.
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed during the shut-down and maintenance period. Formal SES construction meetings were held on September 15 and 29 and on October 4, 11, and 25.

### 3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

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- GM continues to discuss the remaining work under the Order on properties now owned by MLC. Exposed fill areas remain covered and secured both in the Creek area and the East Plant Area while these discussions continue. It is expected that an agreement will be completed with MLC in November 2009. As a result of the delays in completing the agreement, work in the downstream areas may not resume until after the spring 2010 rainy season.

### 4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

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- The following is a list of anticipated work for the next reporting period:
  - Complete agreements with MLC on the completion of remaining work on MLC properties.
  - Maintain temporary liners over exposed fill areas as required.
  - 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 - SEPTEMBER/OCTOBER 2009**  
**GM POWERTRAIN BEDFORD FACILITY**  
**BEDFORD, INDIANA**

	<i>Total (tons)</i>	<i>Total to Date (tons)</i>
Soil ≥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
Soil ≥50 mg/kg (East Plant Area Vault - RCRA sources) <sup>(1)</sup>	0	187,078
Soil <50 mg/kg (East Plant Area Vault - RCRA sources) <sup>(1)</sup>	0	1,456
Total Volume Disposed	0	1,750,423

Note:

<sup>(1)</sup> Estimated from volume calculated using pre- and post-filling surveys of the vault. Conversion factor used was 1.4 tons per cubic yard.

TABLE 2.1

**SES TREATMENT SYSTEM #1 SAMPLING RESULTS - SEPTEMBER/OCTOBER 2009**  
**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 &amp; 3</i>	<i>Between Carbons 2 &amp; 4</i>	<i>After Carbons</i>	<i>Effluent (after bag filters)</i>
9/1/2009	PCB (ug/L) Turbidity (NTU)	ND (0.10) / ND (0.10) 4.11 / 4.07	-- --	-- --	-- --	ND (0.10) 2.97	ND (0.10) 1.65	ND (0.10) 2.09
9/9/2009	PCB (ug/L) Turbidity (NTU)	0.13 5.22	-- --	-- --	-- --	ND (0.10) 0.61	ND (0.10) 0.34	ND (0.10) 0.48
9/14/2009	PCB (ug/L) Turbidity (NTU)	ND (0.10) 2.14	-- --	-- --	-- --	ND (0.10) 0.64	ND (0.10) 0.38	ND (0.10) 0.26
9/22/2009	PCB (ug/L) Turbidity (NTU)	0.17 6.19	0.14 3.29	0.13 3.67	ND (0.10) 0.91	ND (0.10) 1.09	ND (0.10) 0.41	ND (0.10) 0.40
9/30/2009	PCB (ug/L) Turbidity (NTU)	0.24 7.19	-- --	-- --	-- --	ND (0.10) 0.00	ND (0.10) 0.00	ND (0.10) 0.00
10/6/2009	PCB (ug/L) Turbidity (NTU)	0.18 / 0.19 55.3 / 45.8	-- --	-- --	-- --	ND (0.10) 0.14	ND (0.10) 0.00	ND (0.10) 0.00
10/14/2009	PCB (ug/L) Turbidity (NTU)	ND (0.10) 6.73	-- --	-- --	-- --	ND (0.10) 0.00	ND (0.10) 0.00	ND (0.10) 0.00
10/21/2009	PCB (ug/L) Turbidity (NTU)	ND (0.10) 1.73	ND (0.10) 0.80	ND (0.10) 0.38	0.19 / ND (0.10) 0.00 / 0.00	0.15 0.00	0.14 0.00	ND (0.10) 1.89
10/27/2009	PCB (ug/L) Turbidity (NTU)	0.18 / 0.21 8.92 / 8.57	-- --	-- --	-- --	ND (0.10) 0.00	ND (0.10) 0.00	ND (0.10) 0.00

Notes:

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

**APPENDIX A**  
**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
Progress Reports	AOC VIII.39.a	1 <sup>st</sup> 30 days AED	August 30, 2003	complete
	U.S. EPA Approval Email, August 11, 2009	15 <sup>th</sup> of every other month thereafter	November 13, 2009	submitted November 13, 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