

RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #13

SECOND QUARTER 2004

GM POWERTRAIN - BEDFORD PLANT

105 GM DRIVE

BEDFORD, INDIANA

EPA ID# IND006036099

Prepared For:

General Motors Corporation

JULY 2004

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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 second calendar quarter of 2004 for the GM-Powertrain - Bedford Plant (Facility), Bedford, Indiana. Some of the activities conducted as part of the overall RCRA (Resource Conservation and Recovery Act) 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 Third Quarter 2004, will be submitted on or before October 15, 2004.

2.0 LIST OF COMPLETED ACTIVITIES

The following documents were prepared and distributed during this quarter:

- A six-day window with no rainfall occurred during the last month. This triggered a mobilization for seep and spring sampling for a low-flow event, as described in the Site Source Control Work Plan. Though rain occurred on the seventh day (thereby not completely meeting the criterion for low-flow sampling), sampling of these seeps and springs was completed, where possible. The final validated results of this sampling have not been received as of this report.
- Approval of the RCRA Facility Investigation (RFI) Work Plan: Addendum No. 3 was received March 22, 2004, from U.S. EPA.
 - As part of the investigative work, borings were completed in April 2004 and test pits were completed in May 2004. Results from sampling are pending and will be submitted once validation is completed
- Bi-weekly conference calls were held with U.S. EPA, USFWS, IDEM, and Indiana State Health Department (ISHD) on April 13 and 29, May 11 and 25, and June 8, 22, and 29, 2004, to discuss project progress.
- A meeting was held on-Site with the Agencies on April 15, 2004, to discuss Site Source Control at Outfall 002.
- On-Site construction meetings were held on April 15 and 22, May 6 and 20, and June 22, 2004.
- The Soil Technical Memorandum was submitted for review to the U.S. EPA and IDEM on April 16, 2004.
 - Comments have been received and a response to comments will be issued in the near future.
- The revised Site Source Control (SSC) Work Plan: Addendum No. 1 was approved by the U.S. EPA on April 21, 2004
- Meetings were held with owners of properties on and adjacent to the creek and with the general community on April 28 and 29, 2004, respectively. These meetings provided updates on the Corrective Action activities. The next meetings are scheduled for August 4 and 5, 2004.
- On April 30 and June 11, 2004, a meeting was held with the Community Liaison Panel at the Bedford Plant. The next meeting is scheduled for August 6, 2004.

- The draft RFI Work Plan: Addendum No.5 was submitted to U.S. EPA and IDEM on February 18, 2004.
 - Preliminary field confirmation of the thermal anomalies identified during the aerial survey for the immediate area surrounding the plant for those accessible has been completed. The field confirmation for the remaining area is expected to be completed in the next reporting period.
 - The installation of the eleven groundwater monitoring wells, as part of the RFI Work Plan: Addendum No. 5, has been completed. Each of the newly installed monitoring well have been developed. Groundwater sampling will commence a minimum of two weeks after development.
 - Background fluorescence sampling at the seeps/springs, surface water locations, and groundwater monitoring wells, as part of the RFI Work Plan: Addendum No. 5, was initiated during May 2004. Background sampling will continue into on the next reporting period at the off-site monitoring wells, as identified in the draft Addendum No. 5, and as agreed to between GM, U.S. EPA, and IDEM.
 - Comments were received from U.S. EPA and IDEM, and responses to these comments were issued to the agencies on May 4, 2004. These responses are currently being incorporated into the work plan addendum and a final version will be submitted in July.
- Approval has been received for RFI Work Plan: Addendum No. 4 from the U.S. EPA and the final document was issued May 4, 2004.
 - Test pit investigations associated with this work plan began in early June and are expected to continue for four to six weeks. Most of these test pits have been completed, where accessible. Some are located under current haul roads and staging piles and several are located on Parcel 398 (AOI 25) where access has not been granted by the property owner.
- The Downstream Parcels Removal Action Work Plan was approved by the U.S. EPA on May 25, 2004, and the final document has been issued.
- As part of the Downstream Parcels Removal Action Work Plan, bid documents for the work under this work plan have been issued and bids are due in mid-July 2004.
- Interim Measures Work Plans for the Northern and Western Tributaries have been submitted for approval to the U.S. EPA on June 18, 2004.
- The latest version of the e:DAT™ (electronic data access tool) was submitted to the agencies on June 25, 2004.

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 agencies. GM will continue evaluating additional areas requested by residents, and sampling as appropriate on a case-by-case basis, during the next reporting period. Meetings regarding Access Agreements with downstream property owners will continue.

The March 2004, April 2004, and May 2004 CERCLA Removal Action Monthly Progress Reports were submitted during the 2nd quarter of 2004.

**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.

- The RFI Work Plan Addendum No. 5 (Dye Tracer Study).
- Interim Measure for the Northern Tributary.
- Interim Measure for the Western Tributary.

4.0 COMMUNITY RELATIONS

GM is conducting ongoing community relations. GM maintains the toll free information telephone number. Individual meetings continue to be arranged to discuss sampling results with individual residents.

Quarterly meetings to review project status, both with property owners along the creek as well as with the general public, were held for this quarter on April 28 and 29, 2004, at the Facility. The public meeting presentation is published on the web site at www.BedfordPowertrainCorrectiveAction.com. The next meetings are scheduled to occur on August 4 and 5, 2004.

CLP meetings occurred in this quarter on April 30 and June 11, 2004. The next regularly scheduled meeting with the Community Liaison Panel (CLP) is set for August 5, 2004. The CLP was formed to provide additional communication avenues for the community and the meetings are currently held at the GM plant every two months. The CLP meeting minutes are posted on the GM website at www.BedfordPowertrainCorrectiveAction.com.

The eighth Fact Sheet was finalized May 28, 2004. The next Fact Sheet is projected to be issued in August 2004.

On June 10, 2004, GM held an Open House Tour of five houses on North Jackson Street. GM purchased these properties and, as part of a revitalization effort, has made significant changes to the homes in preparation for sale. None of the properties on North Jackson are involved in the cleanup activities underway at the Site. During the Open House, GM also offered guided bus tours of the Site remediation activities.

The Information Center 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. It is likely that GM will be moving the information repository currently located at the library, as the library has indicated they no longer have room to store the files. It is anticipated that it will be moved this summer to the Oakland City University Building located near the plant. Once arrangements have been made to move the repository, a notice of moving will be placed on the web site and at the library. All data in the repository are also located on the aforementioned web site.

5.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

William Doyle, CRA's on-Site Health and Safety Officer, has joined the team and is currently on-Site daily during construction activities. Fred Zehnder has become the GM real estate representative for the project.

6.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

Work projected for the next reporting period includes:

- Submit the final RFI Work Plan: Addendum No. 5, and continue to implement the field work necessary to complete the proposed scope of work;
- Submit a draft RFI Work Plan Addendum No. 6 and implement the field work necessary to complete the dye trace testing at the swallets within the creek bed;
- Prepare and submit a draft RFI Work Plan Addendum No. 7 for additional investigation of PCBs in surface soil located near the intersection of GM Drive and Breckenridge Road;
- Conduct a neighborhood meeting; scheduled for August 4, 2004;
- Conduct a general public information session; scheduled for August 5, 2004;
- Conduct a Community Liaison Panel Meeting; scheduled for August 6, 2004;
- Prepare and distribute Fact Sheet 9; currently projected to be in August;
- Continue with Removal Action activities in the Upstream Parcels;
- Continue ongoing monthly monitoring of groundwater elevations measurements;
- Continue work as part of RFI Work Plan: Addendum No. 4 throughout July 2004;
- Continue the evaluation of RFI soil and groundwater to propose interim measures for various areas of the Facility; and
- Implement the IM Work Plans for properties along the Western and Northern Tributaries, once approved by U.S. EPA.

**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.