GENERAL MOTORS LLC

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>SEPTEMBER/OCTOBER 2011</u>

November 15, 2011

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1.0 INTRODUCTION

This Progress Report covering activities completed in September and October 2011, 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 2011, will be submitted on or before January 15, 2012.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- Excavation of creek sediment and floodplain soils was completed in the previous reporting period. Restoration remaining on properties to the west of Peerless Road are currently being designed by RACER Trust (formerly Motors Liquidation Company), and GM LLC for their respective properties.
- Inspection of the restoration completed south of Broomsage Road was completed in September 2011.
- Maintenance of storm water and erosion controls continued on an as-needed basis.
- Spring 018 water continued to be collected and treated by SES's on-Site water treatment system. Sample results from SES's water treatment system during September/October 2011 are provided in Table 1.
- A bedrock drilling program was initiated in October 2011 to install coreholes supporting the detailed design of the bedrock groundwater diversion trench. The bedrock diversion trench will divert clean groundwater away from Spring 018, thereby reducing the volume of water produced by Spring 018. Data collected from the new coreholes will be used to confirm the proposed trench alignment meets the design criteria for diverting clean water only.
- Design of restoration repairs north of Broomsage Road were sent to the property owner for review in October 2011.
- Continued work on the Downstream Parcels Construction Certification Report covering the excavation phase of the construction phase.
- Conference calls were held on September 8 and 23, and October 14 and 27, 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).
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings were held on September 6, 13, 20,

and 27; and October 6, 11, 18, and 25. Tailgate safety meetings are held daily for both the consultant and the contractor.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

• None.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Continue to collect and treat Spring 018 water, and continue maintenance of erosion controls as needed.
 - Complete the detailed design of the groundwater diversion trench to divert clean water away from Spring 018 including the completion of thirteen bedrock coreholes along the planned alignment.
 - Commence construction of the Spring 018 groundwater diversion trench over the winter 2011/2012.
 - Continue work on the Downstream Parcels Construction Certification Report.
 - The Document Repository at the Plant will be disassembled during the next reporting period. Copies of the documents will be put on CD and will be available at the Bedford Public Library. The website will continue to be updated and can be accessed at: http://www.bedfordpowertraincorrectiveaction.com/
 - The next Public and Community Liaison Panel (CLP) will be held in 2012 after the restoration construction ramps up again in the late spring or early summer.

TABLE 1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - SEPTEMBER/OCTOBER 2011 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
9/1/2011	PCB (ug/L) Turbidity (NTU)	0.23 / 0.17 J 1.70 / 1.73	0.16 J 0.23	0.19 J 3.32	ND (0.20) 0.34	ND (0.19) 0.00	ND (0.20) 0.00
9/8/2011	PCB (ug/L) Turbidity (NTU)	0.18 J 15.34				ND (0.19) 0.00	ND (0.19) 0.00
9/14/2011	PCB (ug/L) Turbidity (NTU)	0.45 51.50				ND (0.19) 0.00	ND (0.20) 0.00
9/20/2011	PCB (ug/L) Turbidity (NTU)	0.87 / 0.89 2.92 / 2.79				ND (0.19) 0.29	ND (0.19) 0.00
9/28/2011	PCB (ug/L) Turbidity (NTU)	1.1 44.40				ND (0.20) 0.43	ND (0.20) 0.00
10/6/2011	PCB (ug/L) Turbidity (NTU)	0.073 J 5.41	0.24 6.59	0.20 / 0.18 J 5.12 / 3.9	ND (0.19) 1.83	ND (0.19) 1.17	ND (0.19) 0.00
10/12/2011	PCB (ug/L) Turbidity (NTU)	0.062 J 18.00				ND (0.095) 1.12	ND (0.19) 0.69
10/19/2011	PCB (ug/L) Turbidity (NTU)	ND (0.20) / 0.060 J 7.76 / 7.65				ND (0.19) 0.38	ND (0.19) 0.00
10/25/2011	PCB (ug/L) Turbidity (NTU)	0.082 J 17.00				ND (0.19) 0.05	ND (0.20) 0.00

Note:

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

J - Estimated Value

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

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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		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 U.S. EPA Approval Email, August 11, 2009	1 st 30 days AED 15 th of every other month thereafter	August 30, 2003 November 15, 2011	complete submitted November 15, 2011
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