RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #11 FOURTH QUARTER 2003

GM POWERTRAIN - BEDFORD PLANT 105 GM DRIVE BEDFORD, INDIANA

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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 fourth calendar quarter of 2003 for the GM-Powertrain – Bedford Plant (Facility), Bedford, Indiana. Some of the activities conducted as part of the overall RCRA Corrective Action work are being addressed under the CERCLA 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 First Quarter 2004, will be submitted on or before April 15, 2004.

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2.0 LIST OF COMPLETED ACTIVITIES

The following documents were prepared and distributed during this quarter:

- Meetings were held with owners of property on and adjacent to the creek and with the general community on October 1 and 2, 2003, respectively. These meetings provided updates on the Corrective Action activities;
- The 9th Community Liaison Panel (CLP) meeting was held on October 3, 2003;
- Preliminary Results for the Removal of Non-Conforming Wastes were submitted to the U.S. EPA and IDEM on October 9, 2003;
- The September 2003 Removal Action Monthly Progress Report was submitted to U.S. EPA, USFWS, IDEM, ACOE, and ISDH on October 14, 2003;
- A letter regarding the Notice of Off-Site Waste Shipment was sent to Michigan Department of Environmental Quality (MDEQ) on October 14, 2003;
- A letter requesting information regarding the requirements of an archeological assessment in the downstream reach was submitted to IDNR October 15, 2003;
- RCRA Quarterly Progress Report No. 10, covering the third quarter 2003, was submitted to the U.S. EPA, USFWS, and IDEM on October 15, 2003;
- On October 28, 2003, the draft Downstream Parcels Removal Action Work Plan was submitted to the U.S. EPA, USFWS, IDEM, ISDH and ACOE for review;
- A 1:24,000 USGS Quadrangle figure showing the study area was submitted to IDNR at their request on November 6, 2003;
- The Site Source Control Work Plan was issued as final on November 11, 2003;
- The October 2003 Monthly Progress Report was submitted to U.S. EPA, USFWS, IDEM, ACOE, and ISDH on November 11, 2003;
- On December 2, 2003, the Upstream Parcels Removal Action Work Plan: Addendum No. 1 was submitted to U.S. EPA, USFWS, IDEM, ACOE, and ISDH;
- The RFI Investigation Groundwater Analytical Databox Figures and validated analytical data tables were submitted to U.S. EPA, USFWS, IDEM, ACOE, and ISDH on December 2, 2003;
- The RFI Addendum No. 3 was submitted to U.S. EPA, USFWS, IDEM, ACOE, and ISDH on December 9, 2003;
- The November 2003 Monthly Progress Report was submitted to U.S. EPA, USFWS, IDEM, ACOE, and ISDH on December 15, 2003;

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- On December 16, 2003, the Test Pit Excavation Work Plan was submitted to U.S. EPA, USFWS, IDEM, ACOE, and ISDH; and
- A draft figure showing Post-Removal Action Remaining PCB Concentrations in the surface soils (up to 0.33 feet) was submitted to the U.S. EPA and USFWS.

On-Site investigation activities from the RFI Work Plan continued during this reporting period. Two of the three remaining angle bedrock borings (as originally proposed in the RFI Work Plan Addendum No. 1, November 18, 2002) were completed at on-Site locations rather than on Parcel 003, as proposed. The third location could not be completed as proposed because Removal Action activities have removed the upper portions of the bedrock at that location. In addition, the three northern angle borings located along the east side were extended at depth because the initial borings were completed above the water table.

Additional delineation soil borings were completed at two Areas of Interest (AOI) west of GM Drive. Five soil borings were completed to the bedrock surface at AOI 22 to delineate the extent of antimony detected in the surface soil during the initial phases of the RFI. Three additional soil borings were completed to the bedrock surface at AOI 18 to delineate the extent of polychlorinated biphenyls discovered in the surface soil from sample SS-X154Y117.

Nine shallow coreholes were advanced near Outfall 002 within the creek channel and at locations to the north of the creek channel to further investigate the potential depth of staining within the upper bedrock. Upon completion of these cores, trenches were completed under the Removal Action program.

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.

Pursuant to the Administrative Order, a complete list of the activities under the CERCLA Removal Action will be addressed in CERCLA Monthly Progress Reports. The

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September, October, and November 2003 Monthly Progress Reports were submitted during the $4^{\rm th}$ quarter.

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3.0 SUMMARIES OF ALL CHANGES MADE IN THE RFI DURING THE REPORTING PERIOD

The following changes were made to the RFI during the reporting period.

- Five new angle bedrock borings were installed along the eastern property boundary.
 Eight additional soil borings were completed at two AOIs to delineate the horizontal and vertical extent of contaminants initially discovered within the surface soil at these locations
- The RFI groundwater analytical databox figures and validated analytical data tables.
- The RFI Work Plan Addendum No. 3.
- The RFI Work Plan Addendum No. 4 (Test Pit Excavation Work).

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4.0 COMMUNITY RELATIONS

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

Meetings to review project status, both with property owners along the creek as well as with the general public, were held for October 1 and 2, 2003 at the Facility. The next meetings are scheduled to occur on January 27 and 28, 2004.

Two CLP meeting occurred on October 3 and December 12, 2003. The next regularly scheduled meeting with the Community Liaison Panel (CLP) was set for February 6, 2004, to provide an update of the project. 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.BefordPowertrainCorrectiveAction.com.

The Information Center is available by appointment through 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. All data in the repository are also located on the web site listed in the previous paragraph.

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5.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

There were no changes in personnel during this reporting period.

6.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

Work projected for the next reporting period includes:

- Project Review Meetings with the agencies is scheduled for January 7 and 8, 2004;
- Neighborhood Meeting scheduled for January 27, 2004, 2003;
- General Public Information Session scheduled for January 28, 2004;
- Community Liaison Panel Meeting scheduled for February 6, 2004;
- Fact Sheet 7 will be distributed in January;
- Submittal of an Action Items List;
- Removal Action activities will continue in the Upstream Parcels;
- Ongoing monthly monitoring of groundwater elevations measurements;
- Work will begin on an ecological assessment of the site;
- Submittal of the biological assessment;
- Submittal of the wetland mitigation plan;
- Submittal of Site Source Control Work Plan Addendum 1;
- The spring and seep control structure construction will begin;
- Implementation of the Test Pit Work Plan once approved by U.S. EPA;
- Work Plan development for completing dye tracer testing near Outfall 002;
- Review groundwater data collected to date and evaluate future data needs;
- Completion and submittal of the Soil Technical Memorandum;
- Preparation of an addendum to the RFI Work Plan for additional soil testing and groundwater investigation;
- Continued evaluation of RFI soil and groundwater to propose interim measures for various areas of the Facility;
- Submittal of the IM Alternatives Review Report; and
- Submittal of IM Work Plans for Western and Northern Tributaries.

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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.