

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*

*CERCLA PROGRESS REPORT
NOVEMBER/DECEMBER 2010*

January 14, 2011

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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 January/February 2011, will be submitted on or before March 15, 2011.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- An agreement between GM and MLC for GM to complete the remaining soil removal work was signed and approved in early August 2010. Removal work of the stockpiled soil at Staging Area 'G' was completed in September 2010 by Severson Environmental Services (SES). An area of floodplain soil will be excavated in spring 2011. This small impacted area remains under a portion of the clay liner in the former Staging Area 'G'.
- Additional Boreholes were installed at Staging Area 'G' in November and December under the U.S. EPA approved delineation work plan. An additional nine locations and an additional 27 samples were submitted for analysis. A summary of the sample results will be submitted under separate cover in January 2011.
- Spring 018 water continues to be collected and treated by SES's on-Site water treatment system. Sample results from SES's water treatment system during November/December 2010 are provided in Table 1.
- A combined public and neighborhood meeting was held on December 2 at the CRA Field Trailer to update the public of the progress of the project and discuss specific individual/neighbor issues.
- A CLP meeting was held on December 3 to discuss the status of the corrective action, removal action, and creek restoration with the Community Liaison Panel.
- Conference calls were held on November 12 and December 1 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 November 2, 9, 16, and 23 and on December 7, 14, and 21. Tail gate safety meetings are held daily for both the consultant and the contractor.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- Excavation of creek and floodplain soils remaining on Parcel 39A beneath the Staging Area G soil stockpile will likely not begin until spring 2011, after the winter and spring rainy seasons. The clean clay pad will be left in place over the winter as soil erosion protection to the remaining PCB impacted floodplain soil.
- On January 1, 2011, a new spring (Spring 015-007) was noted in the same bedrock formation and approximately 25 feet downstream of Spring 018. A sample will be collected and containment will be added to the new spring. The area will continue to be monitored through the next reporting period and any new information will be given to U.S. EPA and IDEM during bi-weekly conference calls.
- Contact with the owners of Spring 18 needs to be established to discuss the proposed remedy in this area prior to scheduling the remedy. There has been some difficulty in reaching the owners' representative. Additional communication efforts are underway to contact the owners' representative.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Once approval of the proposed work is obtained from U.S. EPA and IDEM, some of the clay liner in Staging Area G will be placed over the North Lawrence Water Corp water line realignment to assist in obtaining access for the water corporation to work on the line.
 - Submit an addendum to the Downstream Parcels Removal Action Work Plan for a prescriptive removal of the remaining excavation work under Staging Area 'G' based on the delineation completed in October, November, and December. Additional removal of floodplain soil (still exceeding criteria) beneath the staging pad will be completed in spring 2011.
 - Continue to manage and treat storm water as needed, and to continue to collect and treat Spring 018 water.
 - Commence design of Spring 018 groundwater diversion trench.

TABLE 1
SES TREATMENT SYSTEM #1 SAMPLING RESULTS - NOVEMBER/DECEMBER 2010
GM CETC 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 & 3</i>	<i>Between Carbons 2 & 4</i>	<i>Effluent</i>
11/2/2010	PCB (ug/L)	ND (0.10)	--	--	--	ND (0.10)	ND (0.10) / ND (0.10)
	Turbidity (NTU)	1.64	--	--	--	0.00	0.53 / 0.51
11/12/2010	PCB (ug/L)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)
	Turbidity (NTU)	2.09	2.38	8.20	0.78	1.14	0.34
11/17/2010	PCB (ug/L)	ND (0.10)	--	--	--	ND (0.10)	ND (0.10) / ND (0.10)
	Turbidity (NTU)	7.86	--	--	--	0.55	0.76 / 1.01
11/23/2010	PCB (ug/L)	ND (0.10)	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	3.34	--	--	--	0.20	0.03
11/30/2010	PCB (ug/L)	0.25	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	19.40	--	--	--	4.67	3.60
12/9/2010	PCB (ug/L)	0.15	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10)	ND (0.10) / ND (0.10)
	Turbidity (NTU)	0.11	0.05	0.28	1.45	1.45	0.18 / 0.21
12/15/2010	PCB (ug/L)	0.16	--	--	--	ND (0.10) / ND (0.10)	ND (0.10)
	Turbidity (NTU)	1.65	--	--	--	0.30 / 0.44	0.21
12/21/2010	PCB (ug/L)	0.15	--	--	--	ND (0.10)	ND (0.10)
	Turbidity (NTU)	0.56	--	--	--	0.70	0.14
12/29/2010	PCB (ug/L)	ND (0.10)	--	--	--	0.16	ND (0.10)
	Turbidity (NTU)	0.27	--	--	--	0.65	0.75

Note:

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

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

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<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 U.S. EPA Approval Email, August 11, 2009	1 st 30 days AED 15 th of every other month thereafter	August 30, 2003 January 15, 2011	complete submitted January 14, 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