

RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #16

FIRST QUARTER 2005

GM POWERTRAIN - BEDFORD FACILITY

105 GM DRIVE

BEDFORD, INDIANA

EPA ID# IND006036099

Prepared For:

General Motors Corporation

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**QUARTERLY PROGRESS REPORT
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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 first calendar quarter of 2005 for the GM Powertrain - Bedford Facility (Facility), Bedford, Indiana. Some of the activities conducted as part of the overall Resource Conservation and Recovery Act (RCRA) 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 Second Quarter 2005, will be submitted on or before July 15, 2005.

2.0 LIST OF COMPLETED ACTIVITIES

The following documents were prepared and distributed during this quarter:

- Conference calls were held with the U.S. EPA, United States Fish and Wildlife Services (USFWS), and Indiana Department of Environmental Management (IDEM) on January 4, February 1, March 8, and March 22, 2005, to discuss project progress;
- The 15th Quarterly Progress Report, covering October, November, and December 2004, was submitted to the U.S. EPA on January 17, 2004;
- 2004 Year Ending / 2005 Year Beginning Project Technical Review Meeting with U.S. EPA and IDEM took place January 20, 2005, in Bedford, Indiana at the Stonehenge Inn;
- The Final Environmental Indicator (EI) CA 725 Report was submitted to the U.S. EPA on January 27, 2005;
- Draft Corrective Measures Study (CMS) East Plant Area was submitted to the U.S. EPA and IDEM for review, February 1, 2005. The draft CMS examined several alternative corrective measures for the East Plant Area;
- Conference calls with U.S. EPA and IDEM regarding questions and comments on the CMS East Plant Area were held February 7, February 24, and March 31, 2005;
- Meetings to review the, "Draft Corrective Measures Study 02/01/2005," were held February 14, 2005, March 1, 2005, and March 24, 2005 at the U.S. EPA offices in Chicago, Illinois. Additional alternatives were presented and reviewed at the first two meetings. GM provided responses to comments made during conference calls during these meetings and a general agreement regarding a conceptual proposed Interim Measure for the East Plant Area was reached. The Proposed Scope of Work (SOW) for the East Plant Area detailing the agreement was submitted to the U.S. EPA March 9, 2005;
- Response to Comments for the RFI Work Plan Addendum No. 8 was submitted to the U.S. EPA and IDEM on February 24, 2005;
- A Draft RFI Work Plan Addendum No. 9 was submitted to the U.S. EPA and IDEM on February 28, 2005;
- Revised Proposal for Re-Use of Soil Materials with Low-Level PCBs (<50 mg/kg) was submitted to U.S. EPA on March 9, 2005. This document is a proposed amendment to the Administrative Order on Consent (AOC) signed July 31, 2003, for

the re-use of low PCB-contaminated soil materials as grading fill in the closure of the East Plant Area;

- Revision 1 to the Draft RFI Work Plan Addendum No. 9 was submitted to the U.S. EPA and IDEM for review on March 4, 2005. The addendum proposed additional geophysical investigations and contamination delineation in the East Plant Area. Work on RFI Addendum No. 9 commenced March 16, 2005;
- Mr. Rick Plew of the Indiana Occupational Safety and Health Administration (OSHA) performed an on-Site inspection of ENTACT's trucking subcontractors on March 7, 2005. Results of the inspection are not yet available;
- The final RCRA Facility Investigation (RFI) Work Plan: Addendum No. 8, was submitted to U.S. EPA and IDEM, March 14, 2005. This addendum consists of additional dye trace studies of Area of Interest (AOI) 4 and AOI 6 and incorporated GM's responses to U.S. EPA and IDEM's comments on the draft version. This work commenced March 22, 2005, with the injection of dyes at AOI 4. This monitoring is still on-going and results may not be available until the Second Quarter of 2005; and
- Access was received from the property owner at 2499 Peerless Road (Parcel 40) during March 2005.

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 to U.S. EPA and IDEM. GM will continue evaluating additional areas requested by residents, and sampling, as appropriate, on a case-by-case basis, during the next reporting period

The December 2004, January 2005, and February 2005 CERCLA Removal Action Monthly Progress Reports were submitted during the 1st quarter of 2005.

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:

- Quarterly Progress Report #15: Fourth Quarter 2004;
- The Final Environmental Indicator (EI) CA 725 Report: Determination of Current Human Exposures Under Control;
- Draft Corrective Measures Study East Plant Area;
- Response to Comments for RFI Work Plan: Addendum No. 8;
- RFI Work Plan: Addendum No. 9 - Draft for U.S. EPA review;
- RFI Work Plan: Addendum No. 9 - Draft Revision 1 for U.S. EPA review;
- Proposed Scope of Work (SOW) for the East Plant Area Interim Measure (IM);
- Revised Proposal For Re-Use of Soil Materials with Low-Level PCBs (<50 mg/kg);
and
- The Final RFI Work Plan: Addendum No. 8.

4.0 COMMUNITY RELATIONS

GM continues to maintain 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 the neighbors along the creek and around the plant, as well as with the general public, were held for this quarter on February 21 and 22, 2005, at the Facility. The public meeting format for the February session was an availability session style. A special set of meetings to present the proposed remedy for the East Plant Area to the neighbors along the creek and around the plant as well as with the general public were held on March 30 and 31, 2005. The next meetings are scheduled to occur on June 1 and 2, 2005. They will be a hybrid of the traditional presentation format and the availability session format. Presentations for the meetings are posted on the web site at www.BedfordPowertrainCorrectiveAction.com.

Fact Sheet 10 was issued on March 8, 2004. The next Fact Sheet will be issued in June 2005.

Two CLP meetings occurred in this quarter on January 21, 2005, and March 18, 2005. The March 18, 2005 meeting was a special session to provide an overview of the proposed remedy for the East Plant Area to the panel members. The next regularly scheduled meeting with the Community Liaison Panel (CLP) is set for June 3, 2005. The CLP was formed to provide additional communication avenues for the community and the meetings had been held at the GM plant approximately every two months. At the last meeting, the panel agreed to meet every quarter unless special issues arise requiring more frequent meetings. The CLP meeting minutes are posted on the GM website at www.BedfordPowertrainCorrectiveAction.com.

The Information Center, located at the plant lobby, 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. All data in the repository are also located on the aforementioned web site.

5.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

John Gunter, IDEM's project manager for the Bedford project, retired during this reporting period. Jerry O'Callaghan has taken his place.

6.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

Work projected for the next reporting period includes:

- Submit a Final Technical Memorandum, RCRA Facility Investigation; Soil, Sediment, Surface Water, Wipe Sampling;
- Prepare an Addendum 1 to the Technical Memorandum, RCRA Facility Investigation; Soil, Sediment, Surface Water, Wipe Sampling to include RFI activities completed under RFI Work Plan Addenda 4 through 7;
- Conduct a neighborhood meeting; scheduled for June 1, 2005;
- Conduct a general public information session; scheduled for June 2, 2005;
- Conduct a Community Liaison Panel Meeting; scheduled for June 3, 2005;
- Prepare and distribute Fact Sheet 11; currently projected to be in June, 2005;
- Continue with Removal Action activities in the upstream and downstream parcels;
- Continue monthly monitoring of groundwater elevations measurements;
- Continue the evaluation of RFI soil and groundwater data;
- Prepare an IM Work Plan for the Plant property areas west of GM Drive ;
- Submit response to comments for the RFI Work Plan: Addendum No. 6;
- Submit a modified IM Work Plan for the Northern Tributary to the U.S. EPA for review;
- Submit the Ecological Risk Assessment to the U.S. EPA for review;
- Continue work outlined in RFI Work Plan: Addendum No. 8 for the additional dye trace studies in the AOI 4 and AOI 6 areas in support of the East Plant Area IM;
- Submit the Final RFI Work Plan: Addendum No. 9 for additional geological investigations. These investigations will be performed during the next quarter to support the IM in the East Plant Area;
- Develop and submit the Final Interim Measure Alternatives Review Report for the East Plant Area for U.S. EPA review;
- Complete the design for the East Plant Area Interim Measure and submit for U.S. EPA review;
- Begin installation of on-Site vault in the East Plant Area;
- Begin grading layer for the area under the Cover System in the East Plant Area;

- Develop RFI Work Plan: Addendum No. 10 regarding soil boring installation and document review for five former underground storage tanks (USTs) in the south piston yard and submit to the U.S. EPA for review; and
- Develop RFI Work Plan: Addendum No. 11 regarding a dye trace study in AOI 9 and submit to the U.S. EPA for review.

**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.