

GENERAL MOTORS COMPANY

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

JULY/AUGUST 2010

September 14, 2010

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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 September/October 2010, will be submitted on or before November 15, 2010.

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. Preparation work for Staging Area G commenced in July 2010 with Severson Environmental Services (SES). The transportation of the impacted materials from the soil stockpile at Staging Area G to the East Plant Area began in August 2010 and is anticipated to be completed in September. An area of floodplain soil under the soil pile will be excavated in Spring 2011.
- A total of 30,688 tons of <50 mg/kg PCB material was excavated and hauled during July/August 2010. A summary of PCB soil disposal to date is presented in Table 1.1 and a summary of hauling completed in July/August 2010 is presented in Table 1.2.
- Spring 018 water continues to be collected and treated by SES's on-Site water treatment system. U.S. EPA has approved direct discharge of treated water from SES's treatment systems at the Parcel 216 Staging Area. Sample results from SES's water treatment system during July/August 2010 are provided in Table 2.1.
- A Road Information Session was held on August 12 at the CRA Field Trailer to discuss truck traffic and road maintenance along the trucking routes.
- A final sample was collected from the remaining spring in GM's SSC Seep and Spring Monitoring Program at Spring Well 1 in June 2010. The validated analytical sample results for Spring Well 1 were submitted to U.S. EPA via e-mail on July 27.
- The request submitted to U.S. EPA in June 2010 requesting a reduction of the sampling frequency at Spring 018 from the current monthly schedule to a quarterly schedule was approved by U.S. EPA on July 13.
- Conference calls were held on July 15 and 30, and August 20 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 July 1, 6, 13, 20, and 27 and on August 3, 10, 24, and 31.

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 berm and stockpile pad will be left in place over the winter as soil erosion protection to the remaining PCB impacted floodplain soil.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Complete remaining soil pile removal activities at Staging Area G. Additional removal of floodplain soil beneath the staging pad will be completed in Spring 2011. Placement of clean fill from the staging pad over the North Lawrence Water Corp water line realignment may be completed to build a working surface.
 - Complete restoration of a farm field on a parcel west of Peerless Road.
 - Complete topsoil and grass seeding on properties east of Peerless Road.
 - Complete a public meeting scheduled for September 30, 2010 and a CLP meeting scheduled for October 1, 2010.
 - Minimize erosion in areas not covered with temporary liners.
 - Manage and treat storm water as needed.
 - Continue to collect and treat Spring 018 water in the SES temporary treatment system.

TABLE 1.1
DISPOSAL SUMMARY OF PCB WASTE MATERIAL - JULY/AUGUST 2010
GM CETC BEDFORD FACILITY
BEDFORD, INDIANA

	<i>July/August Total⁽²⁾ (tons)</i>	<i>Total to Date (tons)</i>
Soil ≥50 mg/kg (Heritage Environmental Services)	0	319,912
Soil <50 mg/kg (Republic-Sycamore Ridge)	0	55,666
Soil <50 mg/kg (East Plant Grading Areas)	30,688	1,221,622
Soil ≥50 mg/kg (East Plant Area Vault - RCRA sources) ⁽¹⁾	0	187,078
Soil <50 mg/kg (East Plant Area Vault - RCRA sources) ⁽¹⁾	0	1,456
Total Volume Disposed	30,688	1,785,735

Note:

⁽¹⁾ Estimated from volume calculated using pre- and post-filling surveys of the vault. Conversion factor used was 1.4 tons per cubic yard.

⁽²⁾ Based on estimated tonnage per truck.

TABLE 1.2

DISPOSAL SUMMARY OF <50 mg/kg PCB MATERIAL - JULY/AUGUST 2010
GM CETC BEDFORD FACILITY
BEDFORD, INDIANA

<i>Date</i>	<i>Number of Loads</i>	<i>Net Weight (lb) ⁽¹⁾</i>	<i>Net Weight (tons) ⁽¹⁾</i>
8/9/2010	87	2,948,360.00	1,474.18
8/10/2010	106	3,664,738.00	1,832.37
8/11/2010	93	3,215,289.00	1,607.64
8/12/2010	100	3,457,300.00	1,728.65
8/13/2010	107	3,699,311.00	1,849.66
8/14/2010	0	0.00	0.00
8/16/2010 ⁽²⁾	110	3,803,030.00	1,901.52
8/17/2010	121	4,183,333.00	2,091.67
8/18/2010	114	3,941,322.00	1,970.66
8/19/2010	110	3,803,030.00	1,901.52
8/20/2010	120	4,148,760.00	2,074.38
8/21/2010	0	0.00	0.00
8/23/2010 ⁽³⁾	60	2,074,380.00	1,037.19
8/24/2010	87	3,007,851.00	1,503.93
8/25/2010	111	3,837,603.00	1,918.80
8/26/2010	117	4,045,041.00	2,022.52
8/27/2010	113	3,906,749.00	1,953.37
8/28/2010	0	0.00	0.00
8/30/2010	111	3,837,603.00	1,918.80
8/31/2010	110	3,803,030.00	1,901.52
AUGUST TOTALS	1777	61,376,730.00	30,688.37

Notes:

- ⁽¹⁾ Truck weights based on average weight of trucks selected at random to be weighed at GM scales.
⁽²⁾ Accident on Peerless Rd just south of Area G stopped hauling for about 45 minutes.
⁽³⁾ First truck loaded at 10:08 am. Delay due to training new trucking firm.

TABLE 2.1
SES TREATMENT SYSTEM #1 SAMPLING RESULTS - JULY/AUGUST 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>
7/6/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 2.91	ND (0.10) 0.89	ND (0.10) 1.29	ND (0.10) 1.00	ND (0.10) 1.01	ND (0.10) / ND (0.10) 0.04 / 0.08
7/15/2010	PCB (ug/L) Turbidity (NTU)	0.14 4.56	-- --	-- --	-- --	ND (0.10) 0.88	ND (0.10) / ND (0.10) 0.98 / 0.98
7/21/2010	PCB (ug/L) Turbidity (NTU)	0.17 48.00	-- --	-- --	-- --	ND (0.10) 5.15	ND (0.10) 2.91
7/28/2010	PCB (ug/L) Turbidity (NTU)	0.16 5.36	-- --	-- --	-- --	ND (0.10) 0.28	ND (0.10) 0.03
8/4/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 7.54	ND (0.10) 1.30	ND (0.10) 2.69	ND (0.10) 1.59 / 1.58	ND (0.10) 1.40	ND (0.10) 0.00
8/11/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 8.60	-- --	-- --	-- --	ND (0.10) 2.86	ND (0.10) 0.00
8/18/2010	PCB (ug/L) Turbidity (NTU)	0.17 15.70	-- --	-- --	-- --	ND (0.10) 1.25	ND (0.10) / ND (0.10) 0.57 / 0.54

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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DELIVERABLES SUMMARY

<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 September 15, 2010	complete submitted September 14, 2010
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