



April 14, 2020

Peter Ramanauskas  
U.S. EPA Region 5  
77 West Jackson Blvd.  
Chicago, Illinois 60604-3590

Dear Mr. Ramanauskas:

Re: RCRA Corrective Action Administrative Order on Consent (AOC)  
Progress Report 76, First Quarter 2020  
GM GPS – Bedford Facility, ID 006036099, Docket No. RCRA 05 2017 0011  
Bedford, Indiana

This Progress Report is submitted by General Motors LLC (GM) in accordance with the GM Bedford Global Propulsion Systems (GPS) Facility Resource Conservation and Recovery Act (RCRA) Administrative Order on Consent (AOC – United States Environmental Protection Agency [U.S. EPA] Docket No. RCRA 05-2014-0011), executed on August 4, 2014. This report covers the period of the first calendar quarter of 2020 for the RCRA Corrective Action (CA) Project at the GM GPS – Bedford Facility (Facility) and select surrounding properties (Site), Bedford, Indiana.

The next RCRA progress report covering the second quarter of 2020 will be submitted on or before July 15, 2020.

## 1. List of Completed Activities

The following activities took place and the following documents were prepared and distributed during this quarter:

1. The Groundwater Treatment Plant (GWTP) collected and treated water from the Pilot Trench, Vault sumps, and wet wells during the first quarter of 2020. Operational and compliance samples were collected monthly. Monthly discharge monitoring reports have been submitted to the State of Indiana in conformance with the National Pollutant Discharge Elimination System (NPDES) Permit Number IN0064424.
2. Absorbent socks were removed and replaced from CH-5A and MW-X209Y053 in January and February 2020. Due to the COVID-19 business disruption, the sock change out did not occur in March 2020.
3. Oil collection from CH-2A (solar sipper) was on-going during the quarter, but at a reduced rate due to system inefficiencies.
4. The access road to the GWTP and along the Pilot Trench alignment was re-graded in January 2020.
5. A sample of the water column in CAMW-2 was collected in January 2020.



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6. Monitoring well MW-X165Y068 was abandoned in January 2020.
7. Hexa-disk floating covers were installed in the GWTP exterior, open-topped tanks in January 2020.
8. Quarterly EI CA750 static groundwater elevations were recorded in February 2020.
9. Perimeter gate repairs were made in February/March 2020.
10. Progress Report 75 covering the fourth quarter of 2019 was submitted to U.S. EPA on January 14, 2020. U.S.EPA provided comments by email dated January 14, 2020. Responses to comments were submitted on January 17, 2020.
11. The UAV Thermal Reconnaissance Report was submitted to U.S. EPA on January 15, 2020. U.S. EPA provided an email on February 21, 2020 stating they had no further comment.
12. Final Responses to Comments memo on the RFI Report was submitted to U.S. EPA on February 19, 2020. U.S. EPA provided an email on February 21, 2020 stating they had no further comment.
13. GM provided an email on February 20, 2020 to the CERCLA Order project manager, Mr. Daniel Haag, formally notifying U.S. EPA of the change in project manager under the CERCLA Order. In 2019 GM had provided written notice of the project manager change to Messrs. Ramanauskas and Haag, but only mentioned the RCRA Order in that notice.
14. The EI CA750 sampling memo for the second half of 2019 was submitted to U.S. EPA on February 21, 2020. U.S. EPA provided comments via email on March 3, 2020.
15. Memo summarizing the work completed in the former clarifier area was submitted to U.S. EPA on February 21, 2020. U.S.EPA provided comments via email on February 27, 2020. A revised memo was submitted on March 18, 2020. U.S. EPA provided an email on March 19, 2020 stating they had no further comment.
16. The approved Waste Management Plan was provided to U.S.EPA on February 24, 2020.
17. GM requested approval to abandon temporary monitoring well TMW-X225Y080 on February 27, 2020. U.S.EPA approved the request via email on February 27, 2020.
18. GM requested U.S. EPA agreement that the 90-day timeframe for the CMP as outlined in the RCRA Order will begin when the RFI Addendum is approved. U.S. EPA agreed with the schedule via email dated March 16, 2020.
19. Monthly conference calls/meetings were held with U.S. EPA and IDEM in January, February and March 2020.
20. On-site tailgate meetings for the reporting period were held daily, during field activities, to discuss safety and project scope.

Although not included in the RCRA CA activities, GM continues to work with U.S. EPA and IDEM for the prescriptive removal of PCB-impacted soil at Parcels 400, 430 and 431. The following activities took place and the following documents were prepared and distributed during this quarter related to this work:

1. Parcel 400, 430 and 431 Soil Removal Design Drawings were provided to U.S. EPA on January 29, 2020. U.S. EPA provided an email on February 21, 2020 stating they had no comments on the drawings.
2. GM provided copies of the Parcel 400 and Parcels 430/431 fully executed access agreements to U.S. EPA by email on February 7, 2020.



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3. U.S.EPA provided the 40 CFR §761.61c Approval for Parcel 400 and Parcels 430/431 soil removal on February 21, 2020.
4. IDEM provided the 40 CFR §761.61c Approval for Parcel 400 and Parcels 430/431 soil removal on March 12, 2020.
5. GM, IDEM and U.S. EPA discussed on a conference call in March certain elements of the 40 CFR §761.61c Approvals that GM requested be changed. IDEM and U.S. EPA agreed to consider those requested changes.
6. Bidding documents associated with the soil removal project were sent to five companies in March.
7. Pre-bid meeting was held at the parcels in March 2020.
8. Fully executed access agreements were delivered to the property owners in March 2020.

## **2. Summaries of Problems and Planned Resolutions**

During March 2020, the United States became increasingly impacted by the uncertainties surrounding the global COVID-19 pandemic. Due to the business disruption caused by the pandemic, GM has sought to suspend or defer project tasks until the business disruption has diminished. GM is working with U.S.EPA in determining the scope of the temporarily suspended and deferred work activities.

The solar sipper has been performing at reduced efficiency. The manufacturer's technician was scheduled to inspect and troubleshoot the solar sipper operations, but the planned activity was canceled for travel-related safety concerns during the COVID-19 pandemic.

## **3. Projected Work for the Next Reporting Period**

Work anticipated for the next reporting period, based on GM's proposed suspended or deferred project tasks includes:

1. Continue OMM for the GWTP.
2. Continue GWTP discharge reporting under the NPDES permit.
3. Prepare the 2019 Annual Vault Report.
4. Collect monthly transducer data from the pilot trench monitoring locations.
5. Prepare the RFI Addendum.
6. Submit the Cleanout Inspection memo.
7. Continue contractor selection for the Parcel 400/430/431 prescriptive soil removal.
8. Prepare for the annual agency meeting tentatively scheduled for July 2020.
9. Provide U.S. EPA and IDEM project updates via emails and/or telephone calls.



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Please feel free to call me at 313-506-9465 if you have any questions concerning this information or otherwise regarding the Bedford GM LLC Project.

Sincerely,



Ed Peterson  
Project Manager, Eco-Restorers  
GM Sustainable Workplaces

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Encl.

cc: Daniel Haag; U.S. EPA  
Chris Myer; IDEM  
Ed Peterson; General Motors  
Ryan McDuffee; General Motors  
John Maher; General Motors

Katie Kamm; GHD  
Julie Luzwick; GHD  
Bill Steinmann; GHD  
Francis Ramacciotti; GHD



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