



**Global Environmental
Compliance & Sustainability**

July 11, 2014

Reference No. 013968

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Waste, Pesticide and Toxins Division
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Dear Messers Stimple and Ramanauskas:

Re: GM CET – Bedford Facility, IND 006036099
Performance-Based RCRA Corrective Action and CERCLA Removal Action
Quarterly Progress Report #53, Second Quarter 2014
GM CETC - Bedford Facility
Bedford, Indiana

Please find enclosed the Quarterly Progress Report #53 (Second Quarter 2014) for the Performance-Based RCRA Corrective Action project and the CERCLA Removal Action (RA) at the GM Castings, Engines, and Transmissions (CET; formerly Powertrain) Bedford Facility (Facility) at 105 GM Drive Bedford, Indiana, and select surrounding properties (Site). This report is being submitted in accordance with the Performance-Based RCRA Corrective Action Agreement, signed March 20, 2001 and amended October 1, 2002, March 29, 2007, and May 9, 2008 and 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, as amended for quarterly reporting by U.S. EPA approval, September 14, 2012.

The next RCRA/CERCLA quarterly progress report covering the third Quarter of 2014 will be submitted on or before October 15, 2014.

Should you have any questions regarding this document, please do not hesitate to contact me at (313) 510-4328.

Yours truly,

General Motors LLC

Cheryl R. Hiatt
Project Manager

PG/jdh/7
Encl.

c.c.: See Attached Distribution List

Messers Ramanauskas and Stimple
July 11, 2014

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GM Bedford Distribution List

Peter Ramanauskas	U.S. EPA, Region 5
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James McGuigan	CRA Project Manager
Bill Steinmann	CRA Project Geologist
Katie Kamm	CRA Oversight Engineer
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RCRA Facility Investigation and CERCLA Removal Action

Quarterly Progress Report 53 Second Quarter 2014

GM CET – Bedford Facility
105 GM Drive
Bedford, Indiana

EPA ID# IND006036099
AOC Docket No. V-W-'03-C-747

Prepared for: GM LLC

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**Quarterly Progress Report
Distribution List**

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CRA, Oversight Engineer	Katie Kamm (via e-mail)
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Section 1.0 Introduction

This Quarterly Progress Report is submitted by General Motors LLC (GM) in accordance with the Bedford Performance-Based Corrective Action Agreement (Agreement), executed on March 20, 2001, and modified on October 1, 2002, March 29, 2007, and May 9, 2008; and 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, as amended for quarterly reporting by U.S. EPA approval, September 14, 2012. This report covers the period of the second calendar quarter of 2014 for the Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) Project and the CERCLA Removal Action (RA) at the GM Castings, Engines, and Transmissions (CET; formerly Powertrain) – Bedford Facility (Facility) and select surrounding properties (Site), Bedford, Indiana.

The next RCRA/CERCLA quarterly progress report covering the Third Quarter of 2014 will be submitted on or before October 15, 2014.

Section 2.0 List of Completed Activities

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

- Maintenance of storm water and erosion controls continued on an as-needed basis.
 - Consistent with U.S. EPA's March 10, 2014 approval, the demobilization plan for the Spring 018 water collection and treatment system was initiated in March 2014 and is on-going. The SES WTP components have been disassembled, and the modutanks have been removed. As outlined in the demobilization plan, GM collected samples from the soil underlying the former modutanks (modutank pads) and analyzed the soil samples for PCBs. Four 5-point composite surficial soil samples were collected from each pad; one 5-point composite per quadrant (NE, SE, NW, and SW) from each modutank pad, for a total of eight 5-point composite samples. Analytical results for the collected soil samples were forwarded via e-mail to U.S. EPA and IDEM on June 18 and June 25, 2014 for the Lower modutank Pad and Upper modutank Pad, respectively.
 - Results for samples collected from Spring 018 during the quarter are presented in Table 2.1. Sample results for the monthly sampling were previously emailed to U.S. EPA and IDEM as they became available. As of the June 2014 sampling, the 12-month rolling

average concentration of PCBs in the Spring 018 discharge is 0.16 micrograms per liter ($\mu\text{g/L}$).

- U.S. EPA submitted comments on the GM Bedford Vault 2012 Annual Compliance Report, 2012 Vault Post Closure Plan, and East Plant Area Vault Construction Certification Report on March 18, 2014.
 - GM prepared responses to the comments throughout the second quarter of 2014 and plans to submit the responses in early third quarter 2014.
- GM provided responses to the March 20 and 21, 2014 comments on the Second Half 2013 Environmental Indicator (EI) CA750 monitoring results, on May 8, 2014.
 - The second quarter 2014 EI CA750 monitoring of static groundwater levels and sampling was conducted between May 12 and 16, 2014.
- U.S. EPA and GM continued discussions on a RCRA Corrective Action Order for the Site through the second quarter of 2014. A tentative agreement was reached at that time.
- Maintenance work related to the establishment of the vegetated cover on the East Plant and West Plant, including additional planting, fertilizing, removal of invasive species, etc., was completed. The work was comprised of the application of herbicide to kill the weeds, followed by over-seeding in the spring of 2014.
- The design of the Pilot perimeter groundwater collection trench is ongoing. GM has acquired properties on Barlow Lane for the installation of the groundwater collection trench, and a motion was approved by Bedford City Council in the fall of 2013 to vacate Barlow Lane in advance of trench installation activities. Demolition of several of the acquired houses located on Barlow Lane along the proposed groundwater collection trench alignment and elsewhere where the houses were in very poor condition has been completed.
- The remaining restoration of the properties west of Peerless Road has almost been completed except for the construction of a road across a wet spot in the field on Parcel 40.
- Conference calls were held with U.S. EPA and IDEM on April 10 and 24, and May 8 and 30, 2014, to discuss items related to the project.
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings were held the first Tuesday of the month on April 2, May 6, and June 3, 2014. Tailgate safety meetings are held daily for both the consultant and the contractor.
- The RCRA/CERCLA Quarterly Progress Report #52, covering the first Quarter of 2014, was submitted to the U.S. EPA and IDEM on April 14, 2014.
- Fact Sheet 38 was published on June 6, 2014.

- Representatives from GM, U.S. EPA, IDEM, and CRA met on June 17, 2014, at the Facility, for the 2014 Annual Project Status Meeting. The meeting reviewed tasks completed in the last year and the proposed schedule of completion for tasks this year.
- Public and Community Liaison Panel (CLP) meetings were held on June 18, 2014, to provide an update of the project and address questions and concerns from local residents. The Bedford Times Mail published an article on the meeting on June 19, 2014.

Section 3.0 Summaries of all Problems and Planned Resolutions

- The Spring 018 sample collected on May 14, 2014 was initially reported from the laboratory (Test America – North Canton) with a PCB concentration of 0.49 µg/L, which is above the 0.3 µg/L discharge criteria action level. CRA typically collects two bottles of water for each sampling event, and therefore, the laboratory was instructed to analyze the second bottle collected on May 14, 2014. The reanalysis of the second bottle from the May 14th sampling had a reported PCB concentration of 0.13J µg/L ("J" indicates an estimated quantity below the method reporting limits). CRA also collected a new sample from Spring 018 on May 19, 2014. The PCB concentration in the May 19th sample was reported at 0.061J µg/L. Based on the reanalysis of the second bottle from May 14th and the analysis of the May 19th sample, no further action was required. The subsequent June 11, 2014 routine monthly monitoring sample from Spring 018 had a PCB concentration reported at 0.21 µg/L. GM and CRA are evaluating the sampling and analysis procedures.

Section 4.0 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:

- Publication of Fact Sheet 38 on June 6, 2014
- Public and Community Liaison Panel (CLP) update meetings were held on June 18, 2014

Section 5.0 Community Relations

The telephone number for public contact is 812-277-8954 (Katie Kamm, Conestoga-Rovers & Associates [CRA]). Individual meetings can be arranged to discuss project progress with residents as requested.

The next neighborhood/public meeting and CLP meetings are tentatively scheduled for the end of 2014. Presentations for past meetings are posted on the GM website at: www.bedfordpowertraincorrectiveaction.com

The document repository continues to be located at the Bedford Public Library, with relevant project related documents available on compact disc (CD) in PDF format. Information will be updated periodically, as new documents become available. All data located in the Library repository can also be found on the aforementioned website.

Section 6.0 Changes in Personnel During the Reporting Period

Oversight personnel for CRA and SES remain unchanged. The demobilization of SES's WTP commenced during the first quarter of 2014 and is on-going. The remaining SES workers will leave the Site following completion of the work related to the demobilization of their WTP.

Section 7.0 Projected Work For The Next Reporting Period

Work anticipated for the next reporting period includes:

- Continue monitoring Spring 018 monthly.
- Complete the third quarter EI CA750 groundwater level statics.
- Submit the Annual Monitoring Report for the East Plant Area TSCA Vault for Calendar Year 2013.
- Submit responses to U.S. EPA comments on the GM Bedford Vault 2012 Annual Compliance Report, 2012 Vault Post Closure Plan, and East Plant Area Vault Construction Certification Report received on March 18, 2014.
- Submit the EI CA750 First Half 2014 Results Memorandum.
- Final inspection of the road surface along the haul routes later this year to determine if any final repairs are needed. GM will discuss the final inspection with the County Road Commission.
- Continue the pilot perimeter trench design.
- Complete a work plan addendum to perform additional on-site sampling for the RCRA Facility Investigation Report and submit the Plan to U.S. EPA for review.
- Complete the discussions on the RCRA Order with U.S. EPA.

Section 8.0 Copies of Daily Reports, Inspection Reports, Laboratory/Monitoring Data

Table 2.1 presents the results from Spring 018 sampling.

Additional packages of analytical data have been and will be submitted to U.S. EPA once the validated data became available.

TABLE 2.1

**SPRING 018 SAMPLING RESULTS - APRIL/MAY/JUNE 2014
GM CET BEDFORD FACILITY
BEDFORD, INDIANA**

Area:		P015	P015	P015	P015	P015
Sample Location:		Spring 018C	Spring 018C	Spring 018C	Spring 018C	Spring 018C
Sample Identification:		SW-015-040414-GS-40001	SW-015-040914-GS-40002	SW-015-051414-GS-40008	SW-015-051914-GS-40009	SW-015-061114-GS-40018
Sample Date:		4/4/2014	4/9/2014	5/14/2014	5/19/2014	6/11/2014
	Units					
PCBs						
Aroclor-1016 (PCB-1016)	µg/L	0.19 U	0.20 U	0.19 U / 0.19 U	0.19 U	0.20 U
Aroclor-1221 (PCB-1221)	µg/L	0.19 U	0.20 U	0.19 U / 0.19 U	0.19 U	0.20 U
Aroclor-1232 (PCB-1232)	µg/L	0.19 U	0.20 U	0.19 U / 0.19 U	0.19 U	0.20 U
Aroclor-1242 (PCB-1242)	µg/L	0.19 U	0.20 U	0.19 U / 0.13 J	0.061 J	0.20 U
Aroclor-1248 (PCB-1248)	µg/L	0.11 J	0.20 U	0.49 J / 0.19 U	0.19 U	0.21
Aroclor-1254 (PCB-1254)	µg/L	0.19 U	0.20 U	0.19 U / 0.19 U	0.19 U	0.20 U
Aroclor-1260 (PCB-1260)	µg/L	0.19 U	0.20 U	0.19 U / 0.19 U	0.19 U	0.20 U
Total PCBs	µg/L	0.11 J	ND	0.49 J / 0.13 J	0.061 J	0.21
General Chemistry						
Total suspended solids (TSS)	µg/L	7000	6000	5000	5000	3000 J

Notes:

U - Not detected at the associated reporting limit.

J - Estimated concentration.