

RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #2

**GM POWERTRAIN - BEDFORD PLANT
105 GM DRIVE
BEDFORD, INDIANA**

EPA ID# IND 006036099

**Prepared for:
GENERAL MOTORS CORPORATION**

**OCTOBER 2001
REF. NO. 013968 (10)**
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**Conestoga-Rovers
& Associates**

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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 Voluntary Corrective Action Agreement (Agreement) between the U.S. EPA and GM, executed on March 20, 2001. This report covers the period from execution of the Agreement on March 20, 2001 to the end of the second calendar quarter of 2001 for the GM-Powertrain - Bedford Plant (Facility).

The next quarterly progress report will be submitted on or before January 15, 2001.

2.0 LIST OF COMPLETED ACTIVITIES FOR QUARTER

The following documents were submitted to U.S. EPA and IDEM between July 1, 2001 and September 30, 2001.

- Health and Safety Plan (HASP) - July 12, 2001.
- Project Fact Sheet #2 - July 16, 2001.
- Quality Assurance Project Plan (QAPP) - July 18, 2001.
- Revised RFI Sample Matrix - August 28, 2001.
- Sample Summary and Rationale Document - August 28, 2001.
- Stream Field Sampling Plan - September 21, 2001.
- Amendments to the Field Sampling Plan - October 1, 2001.

When project documents are finalized, they are placed into the Public Repository.

A plant tour and project meeting was held at the GM Powertrain Bedford Plant involving representatives from GM, U.S. EPA, and IDEM on August 28, 2001. Included was a tour of the AOIs and discussion of the off-site well survey and sampling activities, stream reconnaissance activities, stream sampling activities, and the RFI Workplan and Sample Matrix. Minutes from this tour and meeting are included as **Attachment 1**.

Conference calls between representatives from GM, EPA and IDEM occurred this quarter on the following dates:

- July 25, 2001;
- August 15, 2001 and
- September 27, 2001.

Minutes from the August 15th conference call are included as **Attachment 2**.

The off-site well survey within a ½ mile radius of the site was conducted from July 23 to August 10, 2001. Although there are still a few addresses where owners have not yet been reached, approximately 380 properties were contacted. Seven wells and four cisterns were identified as being operable and sampling was also conducted at the same time as the survey. The analytical data are attached as **Attachment 3**. Work is continuing in efforts to contact the remaining properties to determine if a well or groundwater cistern is present on the property.

The stream reconnaissance activities were completed from August 6 to August 8, 2001. Sample locations were discussed based on the reconnaissance with U.S. EPA, IDEM and USFWS in meetings and telephone calls in August and September 2001. Stream sampling occurred in early October (October 1, 2001, through October 8, 2001).

3.0 SUMMARIES OF ALL FINDINGS

Summaries of any findings, which occur after submission of this progress report, will be included in subsequent quarterly progress reports. Analytical data from the well survey are attached in **Attachment 3**.

4.0 SUMMARIES OF ALL CHANGES MADE IN THE RFI DURING THE REPORTING PERIOD

GM is currently completing the rest of the RFI Work Plan, which will be submitted during the next quarter.

5.0 COMMUNITY RELATIONS

A public information repository has been set up at the Bedford Public Library. All finalized work plans and the two project fact sheets have been placed in the public repository. Bedford City officials were updated regarding the off-site well survey and sampling activities and the stream reconnaissance and sampling activities. Residents that were contacted during the off-site well survey and sampling activities were also provided with the two fact sheets.

6.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

A summary of personnel was included in the Community Relations Plan (CRP) submitted June 6, 2001. No changes have occurred. Any changes in personnel during the next reporting period will be presented in the next Quarterly Progress Report.

7.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

The stream field sampling activities began on October 1, 2001. Additional site investigation activities from the RFI Work Plan will commence following the submittal of the overall RFI Work Plan and subsequent review by U.S. EPA.

8.0 COPIES OF DAILY REPORTS, INSPECTION REPORTS, LABORATORY/MONITORING DATA

Attachment 3 presents laboratory reports from Severn Trent Laboratories containing analytical results from the residential well sampling.

ATTACHMENT 1

MEETING MINUTES - AUGUST 28, 2001

**BEDFORD PLANT TOUR/MEETING MINUTES
GMPT – BEDFORD PLANT**

DATE: August 28, 2001

TIME: 8:15 A.M. EST (local)

RECORDED BY: Bill Steinmann

ATTENDEES: Cheryl Hiatt – General Motors
Kim Dobosenski – General Motors
Bill Schoonmaker – General Motors (Plant tour only)
Peter Ramanauskas, U.S. EPA
Priscella Fonseca, U.S. EPA
William Enriquez, U.S. EPA
John Gunter, IDEM
George Ritchotte, IDEM
Bill Giles, IDEM
Jim McGuigan - Conestoga-Rovers & Associates
Bill Steinmann - Conestoga-Rovers & Associates
Rick Bodishbaugh, Exponent
C.Y. Jeng – Environ

8:15 Group assembled at the entrance to the Bedford Plant and signed in with security

8:30 Kim D. led the group to the conference room and played the Plant safety video. Kim also went over other items concerning safety procedures for the Plant tour.

- Safety glasses, hard hats, ear plugs and radio head sets were distributed for the tour.
- An overall and individual AOI location figures were handed out.

8:50 Kim D. led the group on the plant tour. The tour is summarized below:

WWTP – Filter Building

- The group was led through the Plant's WWTP, where Kim gave a brief discussion on how the system works (i.e., process water from the Plant enters the primary clarifiers where the initial biological treatment occurs and where a coagulant and polymers are added to facilitate settling, the water is then pumped across GM Drive to the aeration basins and returned to the secondary clarifiers for further settling and biological treatment; 85-90 percent of the process water is then pumped to the Filter Building, run through anthracite coal filters and is returned to the Plant for reuse, the remaining water is pumped back to the east side of GM Drive for tertiary treatment consisting of granular activated carbon filters; this water is then discharged through Outfall 002.
- Two questions were raised at this juncture: 1) where could borings be located to investigate the former South Lagoons #1, 2, and 3, and 2) why was 10-15 percent of the process water discharged and not recycled?

Jim M. explained that the three former South Lagoons that were located in this area were shallower than the current clarifiers (i.e., the material had to have been removed in order to install the clarifiers), and drilling would be almost impossible here due to the number of subsurface water and utility lines,

Kim D. explained that GM could not recycle all of the process water because it would eventually contain too many dissolved solids for use in the Plant. The water that is reused in the Plant averages about 9 cycles through the treatment system before it must be discharged. Make up water is purchased from the City of Bedford.

- The group was also shown the locations of AOIs 8 and 18 (no questions)
- The northern spring associated with AOI 1 was also attempted to be viewed. However, this sump was currently covered with the riprap material covering the slope up to the former railroad area. Bill Schoonmaker indicated that the manhole just outside of the Filter Building would be the nearest sampling location for the northern and southern springs.

East Side of GM Drive

- The group crossed GM Drive to view the east side and the Sludge Building. AOIs 3, 8, and 11 were observed. It was noted here that AOI 3 was mis-located on the AOI Location figure as being in the Filter Building (the actual location is in the northeast corner of the Sludge Building). There was no PCB storage at this location at the time observed.
- IDEM asked about the current status of the two, 1-million gallon ASTs. Cheryl H. indicated that GM was working with TSCA for closing one of the two ASTs. John G. asked what the ASTs were used for and it was explained by Bill Schoonmaker that the ASTs had previously been used to store PCB hydraulic oil prior to off-site disposal. Currently, the ASTs contain sludge and solids and are used on occasion for surge capacity.
- Outfall 002 (AOI 8) was observed and Bill Schoonmaker indicated that the discharge is monitored pursuant to the requirements of the NPDES permit. Bill also estimated that the current discharge was approximately 100,000 gallons per day.

USTs and Areas Outside of Piston and Die Cast Buildings

- The group returned to the west side of GM Drive and toured the current fuel AST area and former USTs south of the Piston Building. Kim showed the location of the 2000 diesel fuel spill from the AST (AOI 13).
- The area west of the Piston Building (AOI 17) was viewed. The surface in this area appeared to be gravel without pavement.
- AOIs 12 and 1 were then viewed. No specific questions were raised in these areas.

Die Cast Building and Service Tunnels

- Due to the lack of hard hats available, part of the group entered the southern most Service Tunnel – led by Kim D. (AOI 9).
- The rest of the group (B. Steinmann, J. McGuigan, and C.Y. Jeng) then viewed the service tunnel area.
- The tour then proceeded through the south Die Cast Building to the locations of AOIs 3, 24, 22, 11, and 21. Jim McGuigan explained that the previous Sample Matrix that was distributed had been changed. One of the changes included adding a surface sample in AOI 24 due to the presence of saw cuts in the floor.

Oil House and Waste Storage Area

- The area where the paint and thinner spill had occurred was viewed (AOI 19), prior to the group moving to the Waste Storage Area (AOI 2)
- The location of the former RCRA Waste Storage Pad was shown to the group and Jim M. explained the waste streams that had been stored here under the Plant's Part B Permit. Will E. and George R. both asked if any of the oils stored in this area are classified as RCRA waste. Bill Schoonmaker indicated that none of the oils contained any RCRA waste materials, and that the only RCRA waste currently being stored in this area was contained in the metal cabinet along the north side of the Waste Storage Area, which consisted of waste paints generated during maintenance operations)
- The location of the former USTs (AOI 13) was also indicated to the group. John G. indicated that he had spoken with the UST group within IDEM and that they had indicated that GM should have received a letter from them indicating concurrence or denial for the requested closure. CRA indicated that the documentation of such a letter had not been found and that a request for documentation was currently being drafted.

Northern Portion of the Piston Building

- The group was led into the northern portion of the Piston Building (AOI 20). This is the general location where several tubs had leaked and a release of manifold cooling materials had occurred.
- Currently, this area is occupied by the robotic piston making operations. The group was allowed to observe the piston making operations.
- Bill Steinmann pointed out that this was an example of the permanent mold operations designated in the Current Conditions Report.

10:50 The tour concluded by returning to the Engineering Department

11:00 The group then drove to the North Disposal Area (AOI 4). Other AOIs observed from this location were AOI 7, 15 and 10.

11:15 The group arrived at the Project Field Trailer to discuss the tour and to continue the meeting (note: Bill Schoonmaker had to leave the meeting at this juncture). The following summarizes the items discussed during this meeting:

Tour Questions/Discussion

- All agreed that viewing each AOI was beneficial and U.S. EPA and IDEM representatives indicated that they came away with a better understanding of conditions after seeing each AOI.
- Handouts were then distributed consisting of the following:
 - Meeting Agenda
 - August 27, 2001, memo with responses to U.S. EPA and IDEM concerning previous questions that had been raised
 - A revised Sample Matrix table (August 28, 2001)
 - Sample Summary and Rationale document (August 28, 2001) which explains the general sampling strategy and rationale
- Bill Steinmann then discussed the current status of the off-site well survey and sampling program
 - over 380 structures were recorded, of which 7 wells and 4 cisterns were sampled
 - only approximately 25 residences remain (most of these are abandoned structures). GM will continue to pursue this activity.
 - Although sample results were still undergoing data validation, all preliminary samples results were non-detect for PCBs, with one exception
 - 1.1 $\mu\text{g}/\text{L}$ PCB (A 1242) was detected in a monitoring well located on Barlow Lane (well construction, depths, etc. are unknown)
 - GM will be discussing this with the owner and will obtain a second confirmatory sample
 - C.Y Jeng indicated that a preliminary risk analysis had been performed which indicated that this result (only twice the MCL) represents no greater than 10^{-5} (most restrictive, "kiddie pool" scenario) cancer risk, and given the known use of the water supply (watering the garden, and incidental contact and ingestion), the estimated cancer risk is no greater than 10^{-6} ; non-cancer hazard quotients for these pathways are estimated to be 0.2 or less
 - the surrogate recoveries for one sample result (ND) were both outside of the acceptable range – this well will also be re-sampled
- Rick B. then summarized the results of the stream reconnaissance and presented a figure showing the proposed sampling plan.
 - Two issues had yet to be resolved concerning the upcoming Field Sampling Plan (text version): 1) how to complete duplicate sampling (to do duplicates or replicates), and 2) what size of game fish would be considered for fillets (C.Y. and Rick to discuss this week)
 - U.S. EPA and IDEM agreed that IDEM would complete any duplicate or replicate analyses
 - Rick asked for IDEM's input on which species (forage and/or game) that they would like to be targeted, and how IDEM would like to handle split sampling (i.e., duplicate or replicate). John G. indicated that he would relay the information to Scott Davis (IDEM-NRD) and ask for his input.
- GM then requested any final input on the proposed RFI Work Plan and Sample Matrix from U.S. EPA and IDEM.
 - Peter R. requested that two additional borings (and associated sampling) be added to AOI 4 (former North Disposal Area)
 - Peter R. also requested that one additional boring be added to AOI 1 within the footprint of the former railroad roundhouse.
 - GM agreed to both requests

- The final issue that was raised (by IDEM) was the depth of sampling proposed for floodplain and sediment sampling (GM is proposing to sample the upper 10 cm). GM's response is that this first round of sampling has been designed to determine the current risks that may be present and that sediment and soil at greater depths would not be representative of current risk. Any additional sampling would be determined upon conclusion of this initial sampling.
- The final discussion was on the upcoming schedule of activities:

STREAM SAMPLING

- Scott Davis (IDEM) had requested that the sampling not be conducted during the last half of the last week in September and Rick B. requested that the sampling be conducted prior to October, if possible.
- GM plans on submitting the Field Sampling Plan to U.S. EPA by Monday, September 10, 2001, and would like to start the field activities on Monday, September 17, 2001. It should take approximately 7 field days (exclusive of mobilization) to complete.

RFI WORK PLAN

- GM will include the requested additional samples/borings and complete the RFI Work Plan
- No date was discussed concerning submitting this to U.S. EPA, other than prior to the end of September

2:55 Meeting adjourned

ATTACHMENT 2

CONFERENCE CALL MINUTES - AUGUST 15, 2001

MINUTES
GMPT - BEDFORD PLANT

DATE: August 15, 2001

TIME: 1:00 P.M. CDT

RECORDED BY: Lisa Meoli/Bill Steinmann

ATTENDEES: Cheryl Hiatt - General Motors
Jean Caufield - General Motors
Jim McGuigan - Conestoga-Rovers & Associates
Bill Steinmann - Conestoga-Rovers & Associates
Debbie Runkle - Conestoga-Rovers & Associates
Peter Ramanauskas - U.S. Environmental Protection Agency
Will Enriquez - U.S. Environmental Protection Agency
Priscella Conseco - U.S. Environmental Protection Agency (TSCA)
John Gunter - Indiana Department of Environmental Management
Scott Davis - Indiana Department of Environmental Management
Bill Giles - Indiana Department of Environmental Management
Pieter Booth - Exponent
Rick Bodishbaugh - Exponent
CY Jeng - Environ

1. OFF-SITE WELL SURVEY/SAMPLING STATUS

This discussion began at approximately 1:10 P.M. CDT. The following bulleted items were discussed:

- Jim McGuigan/Bill Steinmann relayed that to date, 8 wells were sampled and 3 cisterns had been sampled, a total of 380 structures were visited, and 28 structures need to be confirmed whether or not a well is present. The 28 remaining structures have not been confirmed due to scenarios such as the residence has been abandoned, owner cannot be located, etc.
- Cheryl Hiatt asked if we had results from any samples to date. All preliminary sample results received from the laboratory to date, with the exception of one, were all non-detect. One sample had a positive hit. The samples have not yet been validated. The surrogate recoveries had a low percentage, below the average of 70 percent to 130 percent. The problem with surrogate recovery is being looked into and the last sample result should be completed by the end of next week.
- John Gunter asked what parameters were being sampled. Jim McGuigan answered that the laboratory was analyzing for PCBs only.

2. STREAM RECONNAISSANCE UPDATE

- Rick Bodishbaugh discussed the stream reconnaissance observations. Those observations taken from field notes and photographs will be distributed by the end of next week.
- Rick B. discussed areas of interest for sampling. Those areas discussed are as follows:
 1. Seep Area: Located to the east of plant, north of disposal area, sediment in seep beds and channels. Will be able to collect sediment samples from seep area.
 2. Upper Reach Outfall 002: from the plant to Bailey Scales to Broomsage (County Road 200). This area consisted of a bedrock slab streambed, lack of deposition therefore, few areas for sediment, small forage fish were present, no problem collecting a fish sample at this location, entire flow comes from GM otherwise, the creek would be dry, there is a small drainage area, and high gradient. An area of interest in the Upper Reach area is between Bailey Scales and Broomsage where a quarry cut is present in the hill. It is suspect that over bankflow is present during a rain event. This area is a potential sampling location. Sediment sampling in this area would be challenging.
 3. Bailey's Branch: the streams change after Broomsage, floodplain development, water and most flow still from GM, no change in flow after confluence with Pleasant Run.
 4. Pleasant Run: no contributing flow upstream (flow here from Bailey's Branch), flash flooding likely to occur during a rain event, significant overflow deposition, grazing cattle accessing streambeds – have all-but-destroyed aquatic habitat, beaver dams present (maybe 1 or 2 new), more bank development, crayfish are abundant throughout the entire stream.
 5. Pleasant Run – Old Railroad Crossing: area near old railroad bridge would be a good area to sample, large pools and large fish are present (3-5" length sunfish), performed seining and electroshocking in this area to identify species.
 6. Near the Confluence of Salt Creek: streams team stopped approximately 0.3 miles prior to the confluence of Salt Creek, due to access and heat. This area will be accessed by boat during the sampling event. This area consisted of a soft clay bottom, no riffles or change in flow, and shallow-gradient pools were present.
- Exponent will be developing the sampling plan and will be collating all field notes and photos for distribution.
- Will E. asked if Exponent would be sampling crayfish. Cheryl H. and Rick B. both agreed that it would be a good idea.
- Will E. asked if all samples are non-detect would that dictate an end to the project or what would happen after sampling was completed. Cheryl H. and Rick B. said that would not necessarily mean that the project is completed and that the project should proceed on a step-by-step basis.

- Will E. also requested that a sediment transect be collected at the quarry. Cheryl H. and Rick B. both agreed, due to the fact that over bank flow is present and somewhat has an 'artificial sink' quality.
- Rick B. discussed other areas of interest in the upstream reach near the Mt. Pleasant road crossing as potential reference stations. Those include the following:
 1. Upstream Pleasant Run: previous reference point where low level PCBs were detected, some pools with fish at Mt. Pleasant Road bridge, and upstream it is dry and trampled by cattle.
 2. Gullets Creek: this area would be a good chemical reference due to more flow, higher quality of habitat, no industrial points referenced – mostly residential. This would not be a good aquatic reference stream.
 3. Western Tributary: no surface flow from the plant, flow in the stream, passes through a small residential area, fish were not present, water and sediment samples would be possible in this area, never been sampled.

3. HUMAN HEALTH SAMPLING LOCATIONS – ENVIRON

- CY Jeng, Environ, identified potential locations for human health exposure sampling for water and soil. The discussed locations are as follows:
 1. Western drainage
 2. Upstream 002/Bailey's Branch
 3. Immediately upstream of Broomsage Road: occasional flooding occurs in backyard of resident. Rick B. agreed that this area was ideal due to access for sampling along the drainage. Rick B. performed electroshocking in this area as well.
 4. Immediately downstream of Peerless Road for possible consumption of dairy and beef from grazing cattle.
- Will E. also asked if deer hunting was part of the human health exposure? CY Jeng indicated that all human health exposures would be assessed accordingly.
- Scott Davis asked when sampling would occur? Rick B. anticipates sampling to begin the end of September or early October.

4. RESPONSES TO PREVIOUS QUESTIONS FROM U.S. EPA AND IDEM

- Historically, were grass samples collected? Yes, in the pasture of the McBride property grass samples were collected. These data will be summarized for distribution to EPA and IDEM.
- What is the Battelle Process? Jim M. has obtained additional information concerning this process and will be summarizing and submitting to EPA and IDEM.
- Service Tunnels? Debbie R. is currently working with the plant and requesting additional information on the service tunnels. To date, no additional information including old engineering drawings have been received from the plant.
- Should have information for unanswered questions at the tentatively scheduled meeting on August 29, 2001, or sooner in a memo format. EPA agreed with this format.
- John Gunter asked about AOI 13 – UST closures. If the report had been submitted to Jim M. Jim M. told him that to date nobody had been contacted. John G. suggested that CRA contact the tank division directly.

5. RFI SAMPLING WORK PLAN

Jim M. reiterated that based on the suggestions made on the July 25, 2001, conference call, revisions to the sampling matrix have been made. The following revisions include the following:

- Added two locations north of Piston Building (more extensive fill area than previously thought)
- SVOCs and VOCs have been added to sediment sampling in the seep area.

6. SITE TOUR AND MEETING

The scheduled date for the meeting was August 29, 2001. Discussion occurred due to conflicts with scheduling. The meeting will be rescheduled due to conflicts with EPA. Cheryl H. requested that everyone check their schedules for August 28, or September 5, 6, and 7, and confirm the date with her via e-mail.

- Site tour will take place on day of meeting (date to be determined). Meeting will start with an early A.M. site tour and then back to the field trailer to discuss. Lunch will be ordered.
- CRA will bring new figures and matrix with all changes to the meeting.
- Will E. asked Cheryl H. if she received the Swallow Study he photocopied and left in the trailer for her. Cheryl responded no and requested that Jim M. ask Jeff if he has the study in the trailer. If yes, send a copy to Cheryl H.

ATTACHMENT 3
SEVERN TRENT LABORATORY REPORTS

**SEVERN
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ANALYTICAL REPORT

PROJECT NO. 13968

GM-BEDFORD

Lot #: A1H010237

REC'D CRA

AUG 28 2001

CRA SDG 6

Paul Wiseman

Conestoga Rovers & Assoc., Inc
11100 Metro Airport Center Dr.
Suite 160
Romulus, MI 48174

SEVERN TRENT LABORATORIES, INC.

ORIGINAL ANALYTICAL REPORT

Project#: 13968 Lab#: A1H010237
Name: GMP-T-Bedford Plant

Description

Event: GW - Supply Well Survey
Samples: 1-W (7/31-01)
Analysis: PCB

Amy L. McCormick
Amy L. McCormick
Project Manager

TAT: 2wk
Lab: ATEL/STL

Checked Against Preliminary Data:

Date: 8/28/01 Init.: ABC

Date of Validation Memo: _____

Invoice Approval Date: _____

Comments: _____

August 27, 2001



Worldwide Facilities Group
Remediation Team

October 15, 2001

Mr. Peter Ramanauskas
Project Manager for IND 006036099
Waste, Pesticides and Toxics Division
U.S. Environmental Protection Agency – Region 5
77 W. Jackson Blvd. (DW-8J)
Chicago, Illinois 60604-3590

RE: GM Powertrain – Bedford Plant, IND 006036099
Voluntary RCRA Corrective Action
Quarterly Progress Report #2, Third Quarter 2001

Dear Mr. Ramanauskas,

Enclosed please find two copies of the Quarterly Progress Report #2 (third quarter 2001) for the Voluntary RCRA Corrective Action project at the GM Powertrain – Bedford Plant, 105 GM Drive, Bedford, Indiana. This report is being submitted pursuant to the Voluntary Corrective Action Agreement between U.S. EPA and General Motors, signed March 20, 2001.

Please call me at 248-680-5219 if you have any questions regarding this report.

Sincerely,

Cheryl R. Hiatt
Project Coordinator
General Motors

Attachments: Quarterly Progress Report #2

cc: Distribution List (included with the report)