

GENERAL MOTORS COMPANY

GM CTEC 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

MARCH/APRIL 2010

May 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 May/June 2010, will be submitted on or before July 15, 2010.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- Verification results are presented on Figures 1 through 3 to show progress as of this reporting period. Work completed on Parcel 36 as presented, is complete and preliminary statistical evaluation (95 percent upper confidence limit [UCL] as described in the Downstream Parcels Work Plan) has confirmed that the cleanup objectives have been met. Verification figures as presented may not show validated sample results for recent sampling. Final verification figures and final UCL results will be presented in the Downstream Parcels Construction Certification Report.
- In March and April 2010 the contractor, SES, continued excavation of the Parcel 36 work area along the stream channel of Parcel 36 and beneath the former water treatment plant adjacent to Bud Ikerd Road. Verification sampling was conducted on the following excavated parcel:
 - Parcel 36 on March 3, 8, 15 and 18, 2010 and April 14, 15, 21 and 28, 2010, as presented on Figures 1, 2, and 3.
- A total of approximately 3,774 tons of <50 mg/kg PCB material was placed in Area of Interest 15 within the East Plant Area in March/ April 2010.
 - An estimated 2,080.8 tons came from the excavation on Parcel 36; and
 - An estimated 1,693.2 tons came from the Parcel 216 modutank maintenance work.
- No ≥ 50 mg/kg PCB soil material from Parcel 36 was disposed of at the Heritage Landfill near Roachdale, Indiana in March/April 2010.
- Sediment removal and maintenance of the upper modutank for the SES water treatment plant on Parcel 216 was completed during April 2010. Approximately 1693.2 tons of sediments from the modular tank were transported to the East Plant Area for use as grading fill under the final Cover System. Operation of the SES water treatment plant continued

during the upper modutank cleanout process by utilizing the available storage capacity of the lower modutank.

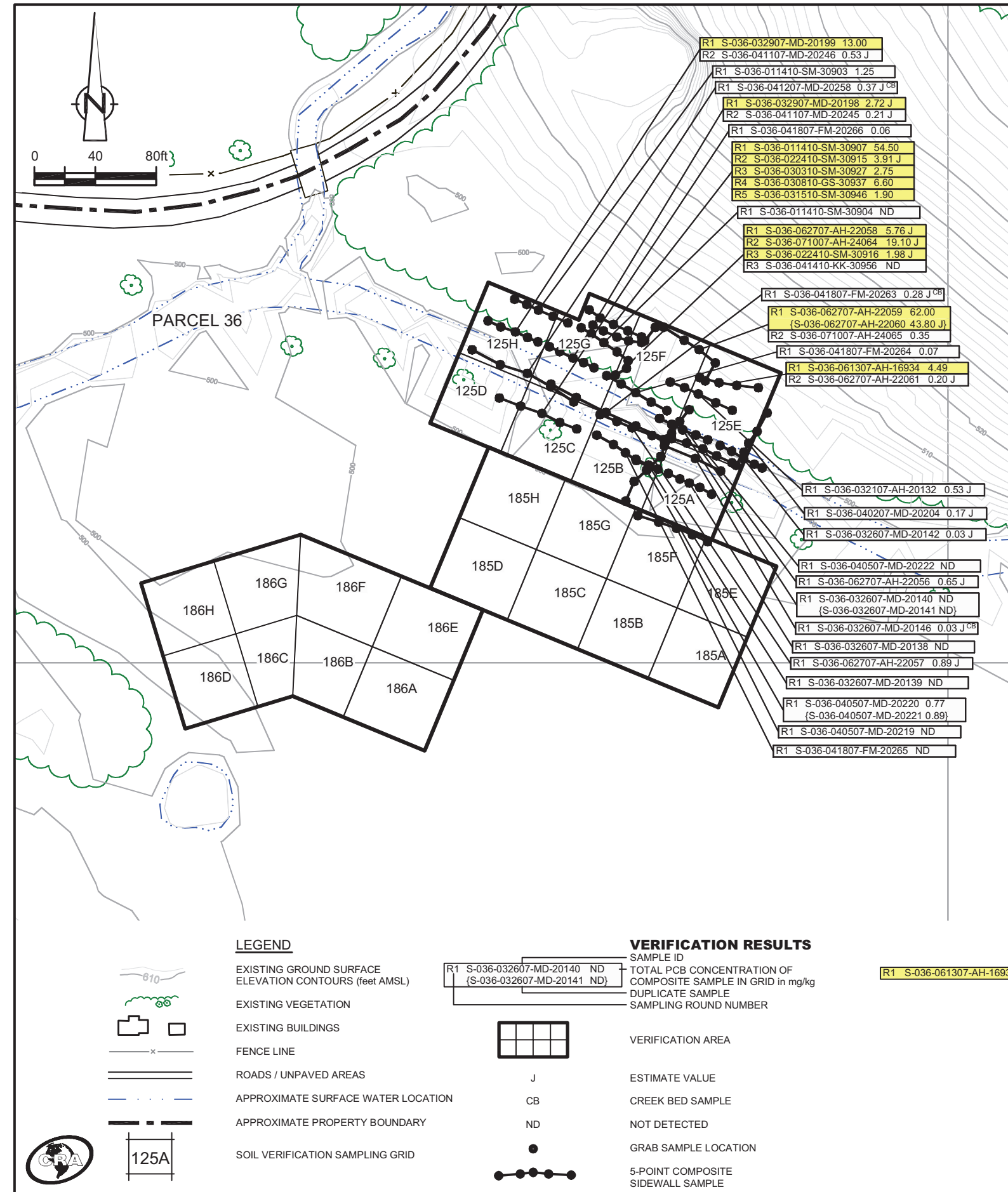
- The summary of PCB soil disposal for March/April 2010 is presented in Table 1.1.
- Spring 018 water continues to be collected and treated by SES's on-Site water treatment systems. U.S. EPA has approved direct discharge of treated water from SES's treatment systems at the Parcel 216 Staging Area. Sample results from SES's water treatment system during March/April 2010 are provided on Table 2.1.
- The Annual Project Status Update Meeting was held with U.S. EPA, IDEM and MLC on April 21, 2010. The purpose of the meeting was to discuss activities over the previous year and the schedule for construction activities for the coming year.
- Conference calls were held on March 11 and April 1, 2010 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).
- Resident and Public Meetings and CLP Meeting March 17 - 19, 2010
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed during the shut-down and maintenance period. Formal SES construction meetings were held on March 2, 9, 16, 23, and 30, 2010, and April 6, 20, and 27, 2010.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- GM continues to discuss with MLC the remaining work under the Order on properties currently owned by MLC. Exposed fill areas not in use remain covered and secured both in the Creek area and the East Plant Area while these discussions continue.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Work on agreements with MLC for properties owned by MLC in order to conduct work on the MLC properties.
 - Maintain temporary liners over exposed fill areas as required.
 - 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.
 - Complete final sampling at last SSC Monitoring
 - Submit a Construction Certification Report and Interim Operation, Maintenance and Monitoring plan for the Parcel 22 RA.
 - Submit a Construction Certification Report for the Parcels 201 and 204 IM.
 - A public meeting is tentatively scheduled for June 17, 2010. The meeting will be published in local papers and invitations sent to the neighbors of the facility prior to the event.
 - A Community Liaison Panel (CLP) meeting is tentatively scheduled for June 18, 2010.



EXCAVATION FLOOR SAMPLE RESULTS

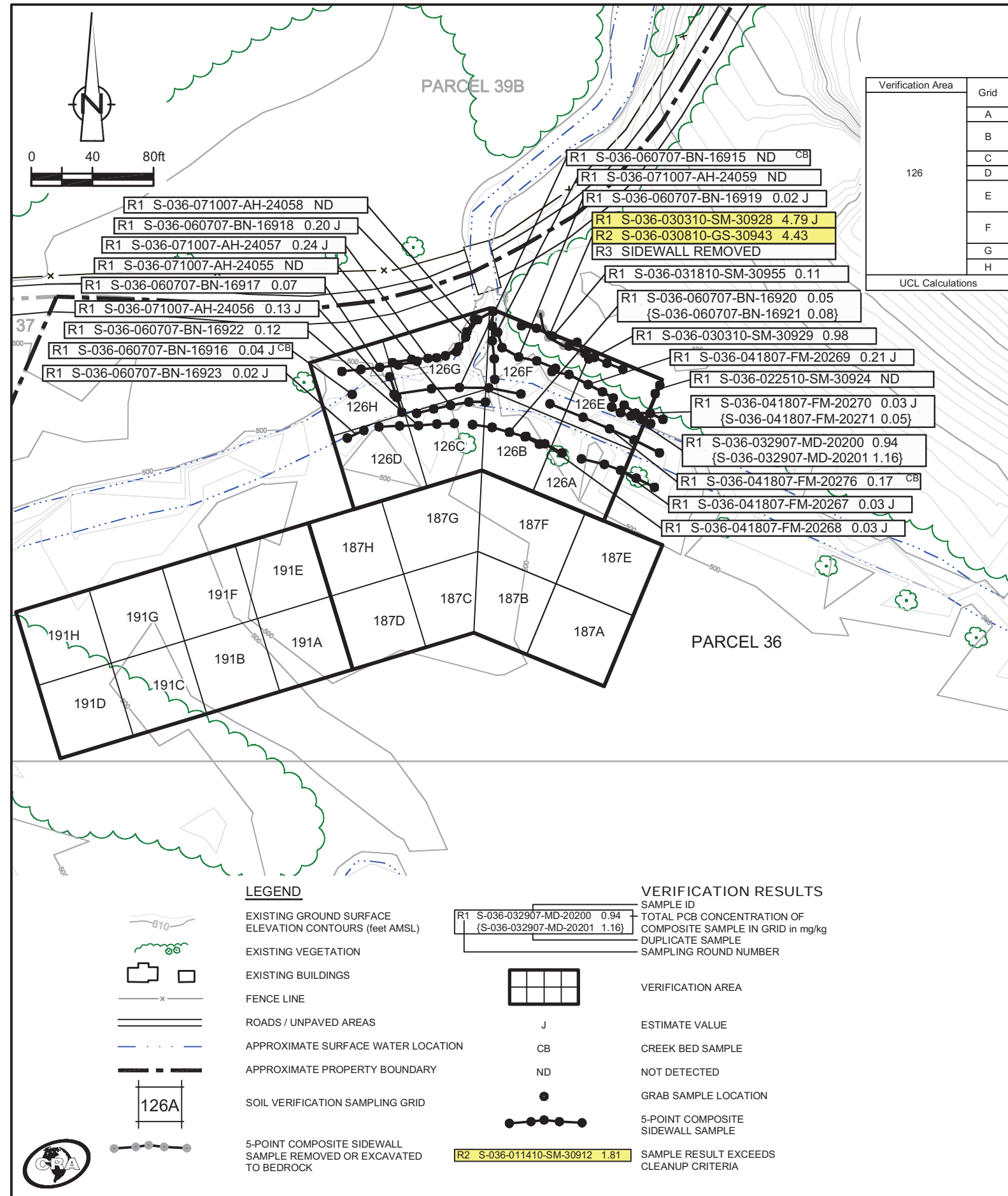
Verification Area	Grid	Sampling Round					
		R1	R2	FINAL			
125	A	S-036-101105-CG-10363	0.15	S-036-040507-MD-20218	0.30	S-036-040507-MD-20218	0.30
		S-036-032607-MD-20156	9.83			S-036-041807-FM-20272	0.23 J
	B	S-036-041807-FM-20272	0.23 J	-	-	S-036-041807-FM-20272	0.23 J
		S-036-041807-FM-20273	0.03 J	-	-	S-036-041807-FM-20273	0.03 J
	D	S-036-041807-FM-20274	0.03 J	-	-	S-036-041807-FM-20274	0.03 J
		S-036-040507-MD-20224	1.31	-	-	S-036-040507-MD-20224	1.31
	F	S-036-061307-AH-16928	8.06	S-036-062707-AH-22055	0.74 J	S-036-062707-AH-22055	0.74 J
		S-036-011410-SM-30908	120.00	S-036-022410-SM-30917	ND	S-036-022410-SM-30917	ND
	G	S-036-061307-AH-16929	0.06	-	-	S-036-061307-AH-16929	0.06
		S-036-011410-SM-30909	0.06	-	-	S-036-011410-SM-30909	0.06
	H	S-036-061307-AH-16930	0.37 J	-	-	S-036-061307-AH-16930	0.37 J
		{S-036-061307-AH-16931	1.77}	-	-	{S-036-061307-AH-16931	1.77}
S-036-011410-SM-30910		0.34 J	-	-	S-036-011410-SM-30910	0.34 J	
{S-036-011410-SM-30911		0.26}	-	-	{S-036-011410-SM-30911	0.26}	
UCL Calculations		Final UCL Calculations Pending					

Verification Area	Grid	Sampling Round			
		R1	FINAL		
185	A	S-036-101105-CG-10355	0.06	S-036-101105-CG-10355	0.06
		S-036-101105-CG-10354	0.07	S-036-101105-CG-10354	0.07
	B	S-036-043007-MD-20307	0.04	S-036-043007-MD-20307	0.04
		S-036-042707-AH-20302	ND	S-036-042707-AH-20302	ND
	D	S-036-042707-AH-20303	0.06	S-036-042707-AH-20303	0.06
		S-036-101105-CG-10360	0.09	S-036-101105-CG-10360	0.09
	E	{S-036-101105-CG-10361	0.05}	{S-036-101105-CG-10361	0.05}
		S-036-101105-CG-10362	0.15 J	S-036-101105-CG-10362	0.15 J
G	S-036-042007-FM-20287	ND	S-036-042007-FM-20287	ND	
	S-036-042007-FM-20288	0.01 J	S-036-042007-FM-20288	0.01 J	
UCL Calculations		Not Required Based on Sample Results			

Verification Area	Grid	Sampling Round			
		R1	FINAL		
186	A	S-036-051907-CH-20594	0.04	S-036-051907-CH-20594	0.04
		S-036-051907-CH-20592	0.06	S-036-051907-CH-20592	0.06
	C	S-036-071007-AH-24049	0.09	S-036-071007-AH-24049	0.09
		S-036-071007-AH-24048	0.14 J	S-036-071007-AH-24048	0.14 J
	E	S-036-051907-CH-20595	0.02 J	S-036-051907-CH-20595	0.02 J
		S-036-051907-CH-20593	0.01 J	S-036-051907-CH-20593	0.01 J
	G	S-036-071007-AH-24045	0.04	S-036-071007-AH-24045	0.04
		S-036-071007-AH-24046	0.06	S-036-071007-AH-24046	0.06
UCL Calculations		Not Required Based on Sample Results			

- GENERAL NOTES**
- Cleanup Criteria
 - Soils to ≤ 1.8 mg/kg.
 - if all results are < 5.0 mg/kg, the cleanup objective can be verified in the Verification Area (approximately 100ft x 200ft) by calculating the Upper Confidence Limit (UCL) of the average concentration using statistics, if the UCL is ≤ 1.8 mg/kg the cleanup objective will be met for the given Verification Area. A value of 0 mg/kg is used in the UCL calculation for sample grids excavated to bedrock.
 - Sediments to ≤ 1 mg/kg.
 - Composite sidewall samples were collected in the location where the sidewall of the excavation exceeded 6 inches in height.
 - The surficial confirmation samples (8 composites per Verification Area except where bedrock is encountered) were collected after the soil/sediment removal was performed.
 - A value of 0 mg/kg is used for ND in the calculation of Total PCBs.
 - For UCL calculations, Aroclors 1016, 1221, and 1232 have been assigned a ND value of 0 mg/kg based upon their lack of presence in the data.
 - UCL calculations are performed on Aroclors 1242, 1248, 1254, and 1260 using half the quantitation limit where ND results are reported.
 - UCL calculations included both floor and sidewall samples.
 - The sampling round (e.g. R1, R2, etc.) correlates to Verification Area grids or sidewalls where additional rounds of excavation were completed due to exceedances of the cleanup criteria.
 - Property boundary locations approximated from the Lawrence County survey plats. Locations may not accurately represent the true property boundaries.

figure 1
 PARCEL 36 (VERIFICATION AREAS 125, 185, AND 186)
 FINAL UNVALIDATED COMPOSITE SAMPLE RESULTS
 POST - EXCAVATION SUMMARY
 GM CTEC BEDFORD FACILITY
 Bedford, Indiana



EXCAVATION FLOOR SAMPLE RESULTS

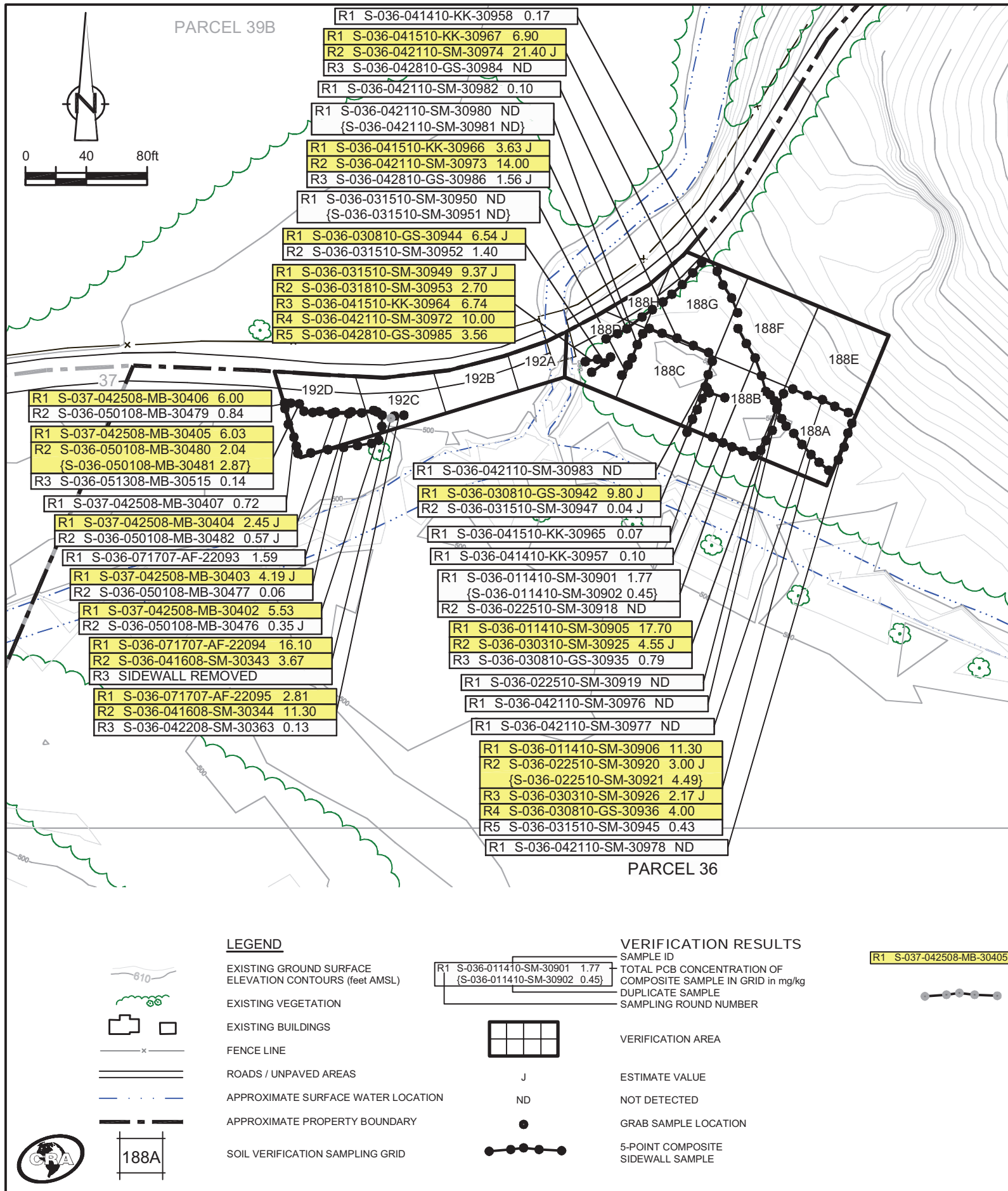
Verification Area	Grid	Sampling Round									
		R1		R2		R3		R4		FINAL	
		Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)
126	A	S-036-041807-FM-20275	0.08	-	-	-	-	-	-	S-036-041807-FM-20275	0.08
	B	S-036-061407-AH-20840 {S-036-061407-AH-20841}	0.73 0.27 J	-	-	-	-	-	-	S-036-061407-AH-20840 {S-036-061407-AH-20841}	0.73 0.27 J
	C	S-036-060807-CH-16924	0.10	-	-	-	-	-	-	S-036-060807-CH-16924	0.10
	D	S-036-060807-CH-16925	0.06	-	-	-	-	-	-	S-036-060807-CH-16925	0.06
	E	S-036-011410-SM-30912	1.81	S-036-022510-SM-30923	ND	S-036-061307-AH-16932	0.60 J	-	-	S-036-061307-AH-16932	0.60 J
						S-036-030310-SM-30932	0.12	-	-	S-036-030310-SM-30932	0.12
	F	S-036-030310-SM-30930 {S-036-030310-SM-30931}	8.80 J 5.50	S-036-030810-GS-30938	42.00	S-036-061307-AH-16933	0.31 J	-	-	S-036-061307-AH-16933	0.31 J
						S-036-031810-SM-30954	0.11	-	-	S-036-031810-SM-30954	0.11
G	S-036-060807-CH-16926	0.03 J	S-036-062807-AH-22067	7.60	S-036-071007-AH-24054	0.18 J	-	-	S-036-071007-AH-24054	0.18 J	
H	S-036-071007-AH-24118	1.18	-	-	-	-	-	-	S-036-071007-AH-24118	1.18	
UCL Calculations		Not Required Based on Sample Results									

Verification Area	Grid	Sampling Round			
		R1		FINAL	
		Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)
187	A	S-036-042707-AH-20304	0.01 J	S-036-042707-AH-20304	0.01 J
	B	S-036-051007-BN-16724	ND	S-036-051007-BN-16724	ND
	C	S-036-071007-AH-24044	0.04	S-036-071007-AH-24044	0.04
	D	S-036-071007-AH-24043	0.16 J	S-036-071007-AH-24043	0.16 J
	E	S-036-042007-FM-20289	ND	S-036-042007-FM-20289	ND
	F	S-036-051007-BN-16723	ND	S-036-051007-BN-16723	ND
	G	S-036-071007-AH-24036	0.20 J	S-036-071007-AH-24036	0.20 J
	H	S-036-071007-AH-24037	0.27 J	S-036-071007-AH-24037	0.27 J
UCL Calculations		Not Required Based on Sample Results			

Verification Area	Grid	Sampling Round			
		R1		FINAL	
		Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)
191	A	S-036-071007-AH-24042	0.23	S-036-071007-AH-24042	0.23
	B	S-036-071007-AH-24040 {S-036-071007-AH-24041}	0.25 0.28	S-036-071007-AH-24040 {S-036-071007-AH-24041}	0.25 0.28
	C	S-036-061407-AH-20842	0.42 J	S-036-061407-AH-20842	0.42 J
	D	S-036-051207-MD-20427	ND	S-036-051207-MD-20427	ND
	E	S-036-071007-AH-24038	0.25 J	S-036-071007-AH-24038	0.25 J
	F	S-036-071007-AH-24039	0.20 J	S-036-071007-AH-24039	0.20 J
	G	S-036-071707-AF-22097	0.23 J	S-036-071707-AF-22097	0.23 J
	H	S-036-051207-MD-20428	0.09	S-036-051207-MD-20428	0.09
UCL Calculations		Not Required Based on Sample Results			

- GENERAL NOTES:
- Cleanup Criteria
 - Soils to ≤ 1.8 mg/kg.
 - if all results are < 5.0 mg/kg, the cleanup objective can be verified in the Verification Area (approximately 100ft x 200ft) by calculating the Upper Confidence Limit (UCL) of the average concentration using statistics, if the UCL is ≤ 1.8 mg/kg the cleanup objective will be met for the given Verification Area. A value of 0 mg/kg is used in the UCL calculation for sample grids excavated to bedrock.
 - Sediments to ≤ 1 mg/kg.
 - Composite sidewall samples were collected in the location where the sidewall of the excavation exceeded 6 inches in height.
 - The surficial confirmation samples (8 composites per Verification Area except where bedrock is encountered) were collected after the soil/sediment removal was performed.
 - A value of 0 mg/kg is used for ND in the calculation of Total PCBs.
 - For UCL calculations, Aroclors 1016, 1221, and 1232 have been assigned a ND value of 0 mg/kg based upon their lack of presence in the data.
 - UCL calculations are performed on Aroclors 1242, 1248, 1254, and 1260 using half the quantitation limit where ND results are reported.
 - UCL calculations included both floor and sidewall samples.
 - The sampling round (e.g. R1, R2, etc.) correlates to Verification Area grids or sidewalls where additional rounds of excavation were completed due to exceedances of the cleanup criteria.
 - Property boundary locations approximated from the Lawrence County survey plats. Locations may not accurately represent the true property boundaries.

figure 2
 PARCEL 36 (VERIFICATION AREAS 126, 187, AND 191)
 FINAL UNVALIDATED COMPOSITE SAMPLE RESULTS
 POST - EXCAVATION SUMMARY
 GM CTEC BEDFORD FACILITY
 Bedford, Indiana



EXCAVATION FLOOR SAMPLE RESULTS

Verification Area	Grid	Sampling Round								
		R1		R2		R3		FINAL		
		Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	
188	A	S-036-011410-SM-30914	14.00	S-036-022510-SM-30922	ND	-	-	S-036-022510-SM-30922	ND	
		S-036-041410-KK-30959	3.65 J	S-036-042110-SM-30970	0.03 J	-	-	S-036-042110-SM-30970	0.03 J	
	B	S-036-011410-SM-30913	0.99	-	-	-	-	-	S-036-011410-SM-30913	0.99
		S-036-041510-KK-30968	1.22	-	-	-	-	-	S-036-041510-KK-30968	1.22
	C	S-036-030310-SM-30933	41.60 J	S-036-030810-GS-30940	3.13 J	S-036-031510-SM-30948	ND	S-036-031510-SM-30948	ND	
		-	-	S-036-030810-GS-30941	5.80 J	S-036-042110-SM-30979	0.04 J	S-036-042110-SM-30979	0.04 J	
	D	S-036-030310-SM-30934	5.66	S-036-030810-GS-30939	2.03 J	-	-	S-036-030810-GS-30939	2.03 J	
		-	-	-	-	-	-	-	-	
E	S-036-041410-KK-30960	0.18	-	-	-	-	-	S-036-041410-KK-30960	0.18	
	{S-036-041410-KK-30961}	0.23	-	-	-	-	-	{S-036-041410-KK-30961}	0.23	
F	S-036-041410-KK-30962	0.05	-	-	-	-	-	S-036-041410-KK-30962	0.05	
	S-036-041410-KK-30963	0.36	-	-	-	-	-	S-036-041410-KK-30963	0.36	
H	S-036-042110-SM-30975	13.00	S-036-042810-GS-30987	0.07	-	-	-	S-036-042810-GS-30987	0.07	
	-	-	-	-	-	-	-	-		
UCL Calculations		Final UCL Calculations Pending								

Verification Area	Grid	Sampling Round							
		R1		R2		R3		FINAL	
		Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)	Sample ID	Result (mg/kg)
192	A	S-036-042308-MB-30366	0.66	-	-	-	-	S-036-042308-MB-30366	0.66
	B	S-036-042308-MB-30367	1.00	-	-	-	-	S-036-042308-MB-30367	1.00
	C	S-036-071907-AF-22104	6.70	S-036-041608-SM-30342	0.64	-	-	S-036-041608-SM-30342	0.64
	D	S-036-071907-AF-22103	2.05	S-037-042508-MB-30400	4.52 J	S-036-050108-MB-30475	1.03 J	S-036-050108-MB-30475	1.03 J
UCL Calculations		Not Required Based on Sample Results							

- GENERAL NOTES:**
- Cleanup Criteria
 - Soils to ≤ 1.8 mg/kg.
 - if all results are < 5.0 mg/kg, the cleanup objective can be verified in the Verification Area (approximately 100ft x 200ft) by calculating the Upper Confidence Limit (UCL) of the average concentration using statistics, if the UCL is ≤ 1.8 mg/kg the cleanup objective will be met for the given Verification Area. A value of 0 mg/kg is used in the UCL calculation for sample grids excavated to bedrock.
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 - For UCL calculations, Aroclors 1016, 1221, and 1232 have been assigned a ND value of 0 mg/kg based upon their lack of presence in the data.
 - UCL calculations are performed on Aroclors 1242, 1248, 1254, and 1260 using half the quantitation limit where ND results are reported.
 - UCL calculations included both floor and sidewall samples.
 - The sampling round (e.g. R1, R2, etc.) correlates to Verification Area grids or sidewalls where additional rounds of excavation were completed due to exceedances of the cleanup criteria.
 - Property boundary locations approximated from the Lawrence County survey plats. Locations may not accurately represent the true property boundaries.

figure 3
**PARCEL 36 (VERIFICATION AREAS 188 AND 192)
 FINAL UNVALIDATED COMPOSITE SAMPLE RESULTS
 POST - EXCAVATION SUMMARY
 GM CTEC BEDFORD FACILITY
 Bedford, Indiana**

TABLE 1.1
DISPOSAL SUMMARY OF PCB WASTE MATERIAL - MARCH/APRIL 2010
GM CTEC BEDFORD FACILITY
BEDFORD, INDIANA

	<i>Number of Trucks During Period</i>	<i>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)	185	3,774	1,190,934
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	-	3,774	1,755,047

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 of 20.4 tons

TABLE 2.1
SES TREATMENT SYSTEM #1 SAMPLING RESULTS - MARCH/APRIL 2010
GM CTEC BEDFORD FACILITY
BEDFORD, INDIANA

Sample Date	Analysis	Influent	After Sand Filter 1	After Sand Filter 2	Between Carbons 1 & 3	Between Carbons 2 & 4	After Carbons	Effluent (after bag filters)
3/2/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 6.11	-- --	-- --	-- --	ND (0.10) 0.59	ND (0.10) 0.00	ND (0.10) 0.00
3/2/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 6.11	-- --	-- --	-- --	ND (0.10) 0.59	ND (0.10) 0.00	ND (0.10) 0.00
3/10/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) / 0.14 17.9 / 18.5	-- --	-- --	-- --	ND (0.10) 0.00	ND (0.10) 0.00	ND (0.10) 0.00
3/16/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 2.44	ND (0.10) 0.00	ND (0.10) 0.00	ND (0.10) / ND (0.10) 0.00 / 0.00	ND (0.10) 0.00	ND (0.10) 0.00	ND (0.10) 0.00
3/23/2010	PCB (ug/L) Turbidity (NTU)	0.15 11.40	-- --	-- --	-- --	ND (0.10) / ND (0.10) 0.00 / 0.00	ND (0.10) 0.00	ND (0.10) 0.00
3/31/2010	PCB (ug/L) Turbidity (NTU)	0.18 6.59	-- --	-- --	-- --	ND (0.10) 1.51	ND (0.10) 1.29	ND (0.10) 0.97
4/7/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) / 0.15 8.38 / 8.63	-- --	-- --	-- --	ND (0.10) 0.43	ND (0.10) 0.33	ND (0.10) 0.31
4/15/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 6.19	-- --	-- --	-- --	ND (0.10) 1.27	ND (0.10) 0.00	ND (0.10) 0.49
4/21/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 10.17	ND (0.10) 16.01	ND (0.10) 7.33	ND (0.10) / ND (0.10) 1.54 / 1.99	ND (0.10) 1.33	ND (0.10) 0.00	-- --
4/28/2010	PCB (ug/L) Turbidity (NTU)	ND (0.10) 7.54	-- --	-- --	-- --	ND (0.10) 0.85	ND (0.10) 0.00	-- --

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 May 15, 2010	complete submitted May 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