GM Sustainable Workplaces
GM Global Technical Center-Service Engineering Bldg.
31266 Alfred Sloan Road
Warren, MI 48092-2047

October 16, 2023

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 85, April through September 2023
GM Casting Operations 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 Casting Operations (BCO) 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 from April through September 2023 for the RCRA Corrective Action (CA) Project at the GM BCO – Bedford Facility (Facility) and select surrounding properties (Site), Bedford, Indiana.

The next RCRA progress report covering October 2023 through March 2024 will be submitted on or before April 15, 2024.

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 April through September 2023. An estimated 0.35 pounds of PCBs were removed during the reporting period through collection and treatment of the groundwater. A summary of the volumes and sample results used for this calculation is provided in Table 1. Operational and compliance samples were collected quarterly. 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. A total of 11,385,454 gallons of treated groundwater were discharged during the reporting period.
2. Absorbent socks were removed and replaced from CH-5, MW-X209Y053, and CAMW-3 monthly from April through September 2023. Table 2 summarizes oil removal (based on disposal weights) from the AOI 8 area.
3. GHD submitted a memo on April 13, 2023, providing the NAPL Recoverability Evaluation.
4. GHD submitted Progress Report 84 to U.S. EPA on April 14, 2023.

5. GHD provided responses to U.S. EPA's comments regarding the 2021 Annual Vault report on April 20, 2023.
6. U.S. EPA approved the responses to comments regarding the 2021 Annual Vault Report on April 26, 2023.
7. GHD submitted the Pilot Trench performance Monitoring Report to U.S. EPA on May 11, 2023.
8. GHD submitted the Phase II Trench Geophysics memo to U.S. EPA on May 17, 2023.
9. GM, U.S. EPA, and GHD met at the project site on May 23,2023, to observe Phase II Trench construction activities.
10. GHD notified U.S. EPA on June 8, 2023, of GHD's intent to demobilize the perimeter air monitoring equipment, in accordance with the 2022 Ambient Air Quality Monitoring Plan.
11. U.S. EPA provided comments on the Phase II Trench Geophysics memo on June 12, 2023.
12. GHD notified U.S. EPA on June 14, 2023, of the completion of bedrock trenching activities.
13. GHD provided U.S. EPA the analytical results from trench cuttings on June 15, 2023.
14. U.S. EPA provided comments regarding the NAPL Recoverability Evaluation on June 26, 2023.
15. GHD submitted the 2022 Annual Vault Report to U.S. EPA on July 13, 2023.
16. GHD provided responses to U.S. EPA's regarding the NAPL Recoverability Evaluation on July 21, 2023.
17. On August 8, 2023, GHD provided U.S. EPA a summary of the August 7, 2023, IDEM stormwater inspection and completed action items.
18. GHD provided the Residential Well Survey memo to U.S. EPA on August 25, 2023.
19. GHD provided the updated Phase II Trench construction schedule to U.S. EPA on September 7, 2023.
20. Quarterly groundwater level monitoring was conducted May 22-25, 2023 and August 28-30, 2023.
21. GHD conducted the semi-annual cap inspection on May 23, 2023. Copies of the field inspection form and photos are provided in Attachment A.
22. East Plant Area Cover System was mowed in April and July 2023.
23. Saplings growing within the cover system were pulled in May and June 2023.
24. Routine project meetings updates were held with U.S.EPA and IDEM on April 19, May 23, June 15, July 20, and September 28, 2023. The regularly scheduled meeting for August 24 was canceled (due to scheduling conflicts).
25. The Indiana Department of Environmental Management (IDEM) performed an inspection of the construction storm water controls on August 8, 2023. As a result of that inspection on August 10, 2023, IDEM issued a notice of deficiency to General Motors with regards to the Construction Stormwater Plan General Permit for the Phase II Trench.
26. General Motors responded to the IDEM stormwater control deficiency notice on August 14, 17 and 24 of 2023 with plans for improving those stormwater controls.
27. On August 25, 2023, IDEM indicated by email that they were satisfied with the stormwater improvements.

2. Summaries of Problems and Planned Resolutions

2.1 Concrete Sealing Upstream of Confluence

GHD is finalizing plans to address the concrete heave and cracking just upstream of the confluence of Bailey's Brach Creek and Tributary 3 including installing a headwall at Tributary 2 that is keyed into the bedrock and creating a lined pool in the area where the concrete broke. This should reduce the potential from cracking due to freeze/thaw cycling.

2.2 Asphalt Crack Sealing

Cover system inspections noted the asphalt cover system cracks are widening. These cracks will need to be cleaned and sealed. Asphalt work is planned to coincide with Phase II Trench construction paving work. Due to the extension of the Phase II Trench, asphalt work will likely be pushed into 2024 when the asphalt suppliers reopen following winter shutdown.

3. Projected Work for the Next Reporting Period

Work anticipated for the next reporting period includes:

1. Complete installation of the Phase II Trench and begin collection of groundwater.
2. Continue OMM for the GWTP.
3. Continue GWTP discharge reporting under the NPDES permit.
4. Collect monthly transducer data from the Pilot Trench monitoring locations.
5. Submit the Phase II Trench Performance Monitoring Plan
6. Begin preparation of the Phase II Trench Construction Completion Report.
7. Submit the 2024 Financial Assurance cost estimate.
8. Finalize the 2021 TSCA Vault Annual Report based on U.S. EPA's acceptance of the response to comments.
9. Finalize the NAPL Recoverability Evaluation memo based on U.S. EPA's acceptance of the response to comments.
10. Revise and resubmit the Residential Well Investigation summary memo to include results of targeted discussions with residents.
11. Mow the East Plant Area cover system.
12. Conduct the semi-annual cover system inspection.
13. Submit revised CMP and LTOMMP.
14. Submit the EI CA750 Sampling Results First Half 2023 summary memo.
15. Conduct the second half 2023 EI CA750 sampling event and the quarterly static water level gauging events.
16. Provide U.S. EPA and IDEM project updates via emails and/or telephone calls
17. Conduct annual Agency meeting.
18. Host a public update meeting.
19. Prepare the Spring 018 Area Decommissioning Plan including the confluence concrete repair

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

Sincerely,

Ed Peterson
Project Manager, Eco-Restorers
GM Sustainable Workplaces

Encl.

cc: Corey Peaslee; U.S. EPA
Chris Myer; IDEM
Nathan Milliman; General Motors
Katie Kamm; GHD
Julie Luzwick; GHD
Nick Cooper; General Motors

Tables

Table 1

GWTP PCB Mass Removal Estimate
GM BCO Facility
Bedford, Indiana

	Groundwater Treatment Plant (GWTP) Treated Volume (gallon)	PCB Influent Concentration [1,3] (µg/L)	Mass PCB Treated [2] (pound)
April 2023	2,760,395	3	0.069
May 2023	1,038,179	3	0.026
June 2023	872,754	3	0.022
July 2023	3,743,238	4.2	0.131
August 2023	2,083,394	4.2	0.073
September 2023	887,494	4.2	0.031
Total Estimated Volume of Water Treated During Reporting Period(gallons)			11,385,454
Total Estimated Mass of PCB Treated During Reporting Period (pounds)			0.35
Total Estimated Mass of PCB Treated, Since January 2019 (pounds)			2.62

Notes:

1 PCB concentration based on an average of parent and duplicate sample, if collected. Quarterly influent sampling began in February 2021.

2 Mass removed = $\frac{treated\ volume\ (gallons) x\ PCB\ concentration(\frac{ug}{L})\ x\ 3.7854}{453.59 \text{ x } 1{,}000{,}000}$

3 Influent sampling reduced from to monthly to quarterly in April 2021.

Table 2

AOI 8 Oil Removal
GM BCO Facility
Bedford, Indiana

Date	Well	Oil Mass (lbs)	PCB Content (mass %)	PCB Mass (lbs) [1]
4/19/2023	CH-6	0.73	11%	0.08
5/24/2023	CH-7	0.98	11%	0.11
6/23/2023	CH-8	0.23	11%	0.03
7/21/2023	CH-9	0.73	11%	0.08
8/30/2023	CH-10	0.48	11%	0.05
9/28/2023	CH-11	1.98	11%	0.22
Total PCB Removed from CH-5 (LNAPL) During Reporting Period [1,3]				**0.56**
Total PCB Removed from CH-5 (LNAPL) Since 2018 [1,3]				**9.72**
4/19/2023	MW-X209Y053	0.48	40%	0.19
5/24/2023	MW-X209Y053	0.98	40%	0.39
6/23/2023	MW-X209Y053	0.23	40%	0.09
7/21/2023	MW-X209Y053	0.73	40%	0.29
8/30/2023	MW-X209Y053	0.48	40%	0.19
9/28/2023	MW-X209Y053	1.48	40%	0.59
Total PCB Removed from MW-X209Y053 (DNAPL) During Reporting Period [1,2,4]				**1.75**
Total PCB Removed from MW-X209Y053 (DNAPL) Since 2019 [1,2,4]				**25.31**
4/19/2023	CAMW-3	0.48	31%	0.15
5/24/2023	CAMW-3	0.98	31%	0.30
6/23/2023	CAMW-3	0.23	31%	0.07
7/21/2023	CAMW-3	0.48	31%	0.15
8/30/2023	CAMW-3	0.18	31%	0.06
9/28/2023	CAMW-3	1.98	31%	0.61
Total PCB Removed from CAMW-3 (DNAPL) During Reporting Period [6,7]				**1.34**
Total PCB Removed from CAMW-3 (DNAPL) Since 2021 [6,7]				**6.71**

Table 2

AOI-8 Oil Removal
GM BCO Facility
Bedford, Indiana

Notes:

1 PCB weight based on average of analytical data

Location	Sample Date	PCB (mg/kg)	Average (mg/kg)
CH-5	9/19/2005	224,500	109,067
	8/16/2011	89,700	
	4/9/2014	13,000	
MW-X209Y053	9/19/2006	400,000	400,000
CH-2A	11/5/2008	380,000	580,000
	4/9/2014	780,000	
CAMW-2 (lower)	11/21/2019	310,000	310,000
CAMW-2 (upper)	11/21/2019	160,000	160,000

2 PCB weight from solar sipper and the initial removal from MW-X209Y053 (3/25/2019) is based on an approximate gallons of oil removal. DNAPL density of 1.16 g/cc used when converting volume (gallons) to mass (pounds). Density value determined by laboratory analysis from the 4/19/2014 sampling event.

3 CH-5 Mass (lbs)= $\frac{Sock\ net\ weight\ (lbs) x\ 109{,}067 (mg/kg)}{1{,}000{,}000\ (mg/kg)}$

4 MW-X209Y053 Mass(lbs) = $\frac{Sock\ net\ weight\ (lbs) x\ 400{,}000\ (mg/kg)}{1{,}000{,}000\ (mg/kg)}$

3/25/2019 mass removal calculated based on removal of 2.5 gallons of NAPL

5 CH-2A Mass (lbs) = $\frac{Liquid\ weight\ (lbs) x\ 580{,}000\ (mg/kg)}{1{,}000{,}000\ (mg/kg)}$

6 CAMW-3 Mass (lbs)= $\frac{Sock\ net\ weight\ (lbs) x\ 310{,}000 (mg/kg)}{1{,}000{,}000\ (mg/kg)}$

7 PCB concentration at CAMW-2 used for removal calculations as no data is available for CAMW3 and the two locations are in close proximity.

8 PCB weight from CAMW-2 is based on an approximate gallons of oil removal during the oil recovery test. Upper and lower NAPL density of 1.18 g/cc and 1.15 g/cc, respectively, used when converting volume (gallons) to mass (pounds). Density value determined by laboratory analysis from the 11/21/2019 sampling event.

9 CAMW-2 (upper) Mass (lbs) = $\frac{Liquid\ weight\ (lbs) x\ 160{,}000\ (mg/kg)}{1{,}000{,}000\ (mg/kg)}$

10 CAMW-2 (lower) Mass (lbs) = $\frac{Liquid\ weight\ (lbs) x\ 310{,}000\ (mg/kg)}{1{,}000{,}000\ (mg/kg)}$

Appendix A

Cap Inspection Form May 23,2023

TABLE D.1

COVER SYSTEMS INSPECTION LOG
CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM
GM CET BEDFORD FACILITY
BEDFORD, INDIANA

Date of Inspection: 05/23/23 **Weather:** Clear

Inspector: Scott Sholar **Temperature:** 70F

ITEM		TYPES OF PROBLEMS	CHECKED		DETAILED ACTIONS REQUIRED	NOTES	DATE AND NATURE OF ACTIONS COMPLETED
			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
VEGETATED SOIL COVER SYSTEM							
	Transect EV1	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect EV2	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				

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BEDFORD, INDIANA

ITEM		TYPES OF PROBLEMS	CHECKED		DETAILED ACTIONS REQUIRED	NOTES	DATE AND NATURE OF ACTIONS COMPLETED
			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
VEGETATED SOIL COVER SYSTEM (CONTINUED)							
	Transect EV3	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect EV4	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION		✔			
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect EV5	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				

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ITEM		TYPES OF PROBLEMS	CHECKED		DETAILED ACTIONS REQUIRED	NOTES	DATE AND NATURE OF ACTIONS COMPLETED
			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
VEGETATED SOIL COVER SYSTEM (CONTINUED)							
	Transect EV6	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect EV7	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect EV8	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION		✔			
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				

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			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
VEGETATED SOIL COVER SYSTEM (CONTINUED)							
	Transect EV9	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect WV1	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EXPPOSURE OF LINER	✔				
		- EROSION	✔				
		- LOCALIZED SETTLEMENT/SLUMPING	✔				
		- PONDING OF WATER/DRAINAGE	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				

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ITEM		TYPES OF PROBLEMS	CHECKED		DETAILED ACTIONS REQUIRED	NOTES	DATE AND NATURE OF ACTIONS COMPLETED
			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
HARD SURFACE COVER SYSTEMS							
	Transect EA1	- QUALITY OF ASPHALT COVER	✔				
		- PRESENCE OF CRACKING OR DISCOLORATION		✔			
	Transect EA2	- QUALITY OF ASPHALT COVER	✔				
		- PRESENCE OF CRACKING OR DISCOLORATION		✔			
	Transect WA1	- QUALITY OF ASPHALT COVER	✔				
		- PRESENCE OF CRACKING OR DISCOLORATION	✔				
ACCESS ROAD							
	ACCESS ROAD	- EROSION	✔				
		- OBSTRUCTIONS/DEBRIS	✔				
		- POTHOLES		✔			
		- DAMAGE CAUSED BY VEHICULAR TRAFFIC		✔			

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			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
SWALE/DRAINAGE DITCHES							
	Transect ES1	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES2	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES3	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				

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			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
SWALE/DRAINAGE DITCHES (CONTINUED)							
	Transect ES4	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES5	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES6	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				

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			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
SWALE/DRAINAGE DITCHES (CONTINUED)							
	Transect ES7	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES8	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES9	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES		✔			

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			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
SWALE/DRAINAGE DITCHES (CONTINUED)							
	Transect ES10	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES11	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES12	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				

TABLE D.1

COVER SYSTEMS INSPECTION LOG
CONSTRUCTION CERTIFICATION REPORT EAST PLANT COVER SYSTEM
GM CET BEDFORD FACILITY
BEDFORD, INDIANA

ITEM		TYPES OF PROBLEMS	CHECKED		DETAILED ACTIONS REQUIRED	NOTES	DATE AND NATURE OF ACTIONS COMPLETED
			NO PROBLEMS	CORRECTIVE ACTION REQUIRED			
SWALE/DRAINAGE DITCHES (CONTINUED)							
	Transect ES13	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				
	Transect ES14	- QUALITY OF VEGETATIVE COVER - LENGTH OF GRASS - DEAD/DYING GRASS - GRASS COVERAGE - NOXIOUS WEEDS	✔				
		- EROSION	✔				
		- OBSTRUCTIONS	✔				
		- CULVERT/CATCH BASIN - OBSTRUCTIONS - SEDIMENT ACCUMULATION	✔				
		- SIGNS OF BURROWING BY ANIMALS	✔				
		- ROOTING OF TREES	✔				