# RCRA Corrective Action December 2022

# GM Bedford Casting Operations Facility, Bedford, Indiana

*Project Fact Sheet 49*

This is the forty-ninth Project Fact Sheet that has been prepared to provide the community with information regarding RCRA Corrective Action (CA) activities being performed at the General Motors (GM) Bedford Casting Operations (Facility). This Fact Sheet discusses the CA activities that were completed or are ongoing during late 2021 and 2022.

## Project Background

A RCRA Administrative Order on Consent (AOC) between GM and the U.S. Environmental Protection Agency (U.S. EPA) to complete the CA work was signed on August 4, 2014. A significant portion of the work described in the AOC has been completed, including the RCRA Facility Investigation and numerous Interim Corrective Measures (a.k.a. 'IMs' or 'remedy components'). The implementation of IMs allows GM to accelerate the pace of the remediation process, but these remedies are not formally thought of as "final" determinations until U.S. EPA issues its Final Decision at the end of the CA process. Since the start of the RCRA CA, GM has completed IMs for Bailey's Branch and Pleasant Run Creeks, Spring 018, several soil cleanups, the East Plant Area and West Plant Area Cover Systems, the Pilot Groundwater Collection Trench and many others.


## Project Update

Within the East Plant Area at the GM Bedford Facility, cover systems designed to limit human exposure and infiltration of precipitation continue to be monitored on a semi-annual basis and maintained as needed. The spring inspections are conducted in April/May of each year and the fall inspections are conducted in October/November of each year. Groundwater samples are collected semi-annually as part of the CA750 monitoring events.


Dye Injection

Since December of 2019 GM has been conducting an evaluation of the groundwater capture zone of the Pilot Trench according to a plan entitled Pilot Trench Performance Monitoring Plan. The plan, which includes multiple tests, such as dye trace studies, groundwater flow monitoring and PCB sampling of select groundwater monitoring wells, springs and surface water, is designed to determine whether groundwater in the northern portion of the East Plant Area of the Facility is captured by the Pilot Trench before it can flow off of GM property. The results from these different tests will be combined to better understand how successful the trench is in controlling groundwater flow to ensure potential contamination is properly managed and remains on GM property.

The Pilot Trench Performance Monitoring Plan work is nearly complete and the preliminary results are encouraging. The report is expected to be submitted to U.S. Environmental within the next few months. The results of this study are expected to support the necessity of installing additional groundwater controls along the northern end of the East Plant Area to ensure groundwater contamination does not migrate from the GM property.

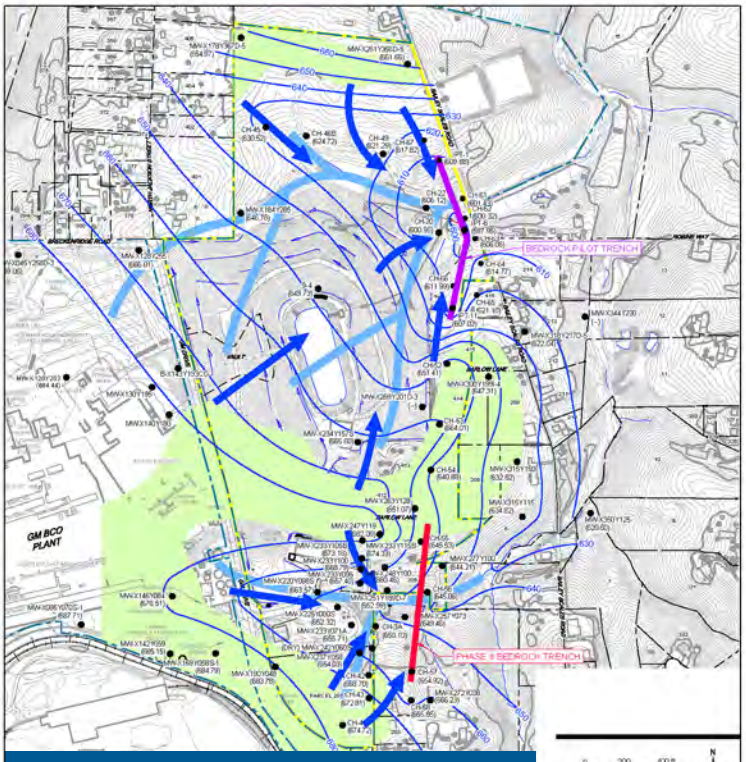

Observed direction of dyed groundwater flow from East Plant Area dye trace studies

The second phase of the Perimeter Groundwater Collection Trench construction is scheduled to begin in January 2023. The Phase II Trench is designed to work in conjunction with the previously installed Pilot Trench and other installed interim measures to provide horizontal and vertical control of impacted groundwater and manage water from leaving GM property. The Phase II Trench construction will consist of installation of a trench, cut into bedrock, across the bedrock valley located in the southern portion of the GM property. The Phase II Trench design is similar to that of the previously installed Pilot Trench.

GM is completing an evaluation of the potential to remove nonaqueous phase liquids (also known as "NAPL") from underground areas within the Former Clarifier Area, located in the southern portion of the West Plant Area. NAPL is a separate liquid, such as oil, that does not mix with water and either floats or sinks below the groundwater surface. The evaluation is ongoing at one monitoring well in this area and involves removing the NAPL from a monitoring well, then measuring the time it takes for the NAPL levels to re-establish in the well, a process referred to as "recharge". A situation where the NAPL quickly recharges into the well back to the original level can indicate that active removal of the NAPL could be successfully accomplished from the well. However, if the NAPL recharges into the well slowly over time it would indicate that such recovery would be difficult and would have limited success. This evaluation work is ongoing, but results should be available early in 2023.

GM is readying the plan to decommission the berm surrounding Spring 018 along Bailey's Branch Creek, which was used to consolidate and contain water during the active remediation of that area and restore flow from the spring into the creek system. The northern wall of that berm is to be removed to allow water to naturally flow into the creek. Years of sampling at Spring 018 indicated that the removal and restoration of the area around the spring was proven effective and that water collection and treatment conducted as an IM was no longer necessary. In conjunction with the berm work, GM will repair an area of restored creek bed upstream of the spring that was recently damaged following several high intensity rain events.

Finally, GM is developing plans for the final corrective measures for the CA. A description of these measures, and the basis for them, will be included in the Corrective Measures Proposal (CMP) that is being prepared. Once the CMP has been preliminarily accepted by U.S. EPA they will release it for public comment along with a summary of the proposed final corrective measures as part of the agency's Statement of Basis. GM expects the CMP will be finalized as early as 2023.



Groundwater flow direction (depicted by arrows) determined by water level measurements

## Communications Update

GM has recently updated its public website at www.BedfordPowertrainCorrectiveAction.com. The new website, to be launched in December 2022, has many of the popular features from the original website, such as the Fact Sheets, project reports and project documents that describe GM's actions, and includes some new information that better illustrates our work and goals with the CA. We've also included more pictures of our project and made those pictures more easily accessible.

The last neighborhood/public meeting was held on the evening of September 29, 2022. The presentation materials for this meeting are posted on the project website.

This Fact Sheet has been provided to area residents through the U.S. Postal Service and by direct handout at the field trailers and community meetings. If you would like to receive this and future Fact Sheets through the mail, please contact Katie Kamm at (812) 277-8954 and you will be added to our mailing list or let Katie know if you no longer wish to receive it.

## Contact Information

If you would like more information about this project, please contact any of the following:

U.S. EPA
*Peter Ramanauskas*
for general information and on-site work
Tel: (312) 886-7890

*Corey Peaslee*
for creek cleanup work
Tel: (312) 758-0604

IDEM
*Chris Myer* (IDEM)
Tel: (312) 233-4625

PROJECT INFORMATION – GM
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The key documents listed in the columns to the right have been submitted to U.S. EPA and IDEM since Fact Sheet 48.

## Public Access Website at..

**www.BedfordPowertrainCorrectiveAction.com**

Get up-to-date project information and view project related documents.

### 2021

* Progress Report 79 – Fourth Quarter 2020
* Clarifier Area Oil Assessment Work Plan
* Corrective Measures Proposal
* Long Term Operations, Maintenance and Monitoring Plan
* Progress Report 81 – April-September 2021
* Completion of the Spring 018 Interim Measure Summary
* Progress Report 80 – First Quarter 2021
* TSCA Vault Annual Report Calendar Year 2020

### 2022

* Phase II Perimeter Groundwater Trench Collection System Design Report
* Progress Report 82 – October 2021-March 2022
* TSCA Vault Annual Report Calendar Year 2021
* Residential Well Survey Work Plan
* Progress Report 83 – April-September 2022