

GENERAL MOTORS CORPORATION
GM POWERTRAIN 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

MONTHLY PROGRESS REPORT - AUGUST 2003

SEPTEMBER 10, 2003

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1.0 INTRODUCTION

This Monthly 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 (U.S. EPA Docket No.: V-W-03-C-747) effective July 31, 2003.

The next monthly Progress Report, for the month of September 2003, will be submitted on or before October 15, 2003.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS MONTH

- On August 7, 2003, GM met with the Lawrence County Road Commission to discuss county road usage during the remediation project;
- On August 8, 2003, General Motors (GM), the United States Environmental Protection Agency (U.S. EPA), and the Indiana Department of Environmental Management (IDEM) met separately with the residents of 112 Bailey Scales Road and 125 Bailey Scales Road in the presence of their representatives in order to facilitate access for cleanup of their properties. ;
- GM provided modified Access Agreements to the residents of 112 and 125 Bailey Scales Road on August 18th, 22nd, 27th and 28th. Executed copies have not yet been received however, their representatives have indicated that they will execute the August 28th version;
- GM provided additional modified Access Agreements to the residents of 158 Broomsage Road on August 18th, 22nd, 27th and 28th. Executed copies have not yet been received however, their representatives have indicated that they will execute the August 28th version;
- GM received IDEM's certification on August 13, 2003, for the use of Rumpke's Medora Landfill located in Jackson County, Indiana or Republic's Sycamore Ridge Landfill located in Vigo County, Indiana for the non-RCRA-hazardous, <50 ppm PCB soil and sediment generated during the remediation activities;
- On August 13, 2003, additional information was submitted to IDNR regarding the Mitigation Plan - Construction in a Floodway Permit;
- The Quality Assurance Project Plan (QAPP) was submitted to the U.S. EPA on August 14, 2003;
- The July Monthly Progress Report was submitted to the U.S. EPA on August 19, 2003;
- On August 19, 2003, the Certification received from the IDEM Commissioner to send <50 ppm PCB waste to select Subtitle D landfills was sent to the Republic's Sycamore Ridge Landfill and Rumpke's Medora Landfill.
- On August 20, 2003, a conference call occurred between the United States Fish and Wildlife Service (USFWS), IDEM and GM to discuss the results of the bat survey and USFWS's request for a biological assessment;

- On August 20, 2003, GM received a letter from the United States Army Corp of Engineers (USACE) stating that since the cleanup is being conducted under CERCLA, a permit from the USACE is not required.;
- The Site Source Control Work Plan was submitted to the U.S. EPA on August 21, 2003;
- On August 21, 2003, GM attended a luncheon with local members of the Bedford Mortgage Brokers and Lenders Association and presented an overview of the Removal Action project;
- Heritage received, via email, on August 22, 2003, notification that the U.S. EPA would be issuing a formal letter stating that the Heritage RCRA Subtitle C Landfill located in Roachdale, Indiana, met the requirements of the 'off-site' disposal Rule under CERCLA;
- A meeting with the Community Liaison Panel (CLP) was held at the Bedford Plant on August 22, 2003;
- On August 29, 2003, an access agreement was executed with the property owner at 505 4th Street for cleanup of that property;
- On August 29, 2003, a letter was sent from GM to the U.S. EPA requesting an 45 day extension to obtain property access (as pursuant to Paragraph 43 of Section IX of the AOC); and
- Mr. Marty Maupin (IDEM Water Quality Division) toured the Bedford creek site area on August 30, 2003.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- Access Agreements, as outlined in the Appendix 6 of the AOC, have been provided to all property owners where access was not previously obtained. Access has still not been received from property owners at 112 Bailey Scales Road, 125 Bailey Scales Road, 201 Bailey Scales Road, 330 Robins Way, 314 Bailey Scales Road, 158 Broomsage Road, 145 Broomsage Road, 478 Bud Ikerd Road, 826 Bud Ikerd Road, 535 Rawlins Mill Road, 1596 Peerless Road, and 2499 Peerless Road, 206 Shandell Drive, a property south of the confluence of Bailey's Branch Creek and Pleasant Run Creek(Parcel 29), and a property on Bud Ikerd Road east of Peerless Road (Parcel 36).
 - GM has requested an extension of the AOC timeframes to obtain access.
 - GM, U.S. EPA and IDEM will continue meeting with the property owners to obtain access.
- GM has received concurrence from USFWS to cut remaining trees in the remediation area on all Parcels upstream and inclusive of Parcel 22. USFWS has requested additional information regarding Parcels downstream of Parcel 22 prior to authorization of tree removal in those areas. This additional information includes a Biological Assessment on potential impacts of PCBs on the Indiana Bat.
 - GM is in consultation with USFWS and the U.S. EPA and is preparing the requested information.
 - A report is currently being finalized regarding the bat mist-netting survey.

- Approval to initiate the cleanup has not been received from IDEM Water Quality Division for work within the channel.
 - GM is working with IDEM Water Quality Division to respond to their questions, including re-submittal of previously submitted documents and preparation of newly requested documents.
 - IDEM's representative visited the Site on August 30, 2003, to view the work areas.
- Issues were raised by the Indiana Department of Natural Resources (IDNR) concerning GMs submittal on Mitigation Plan – Construction in a Floodway Permit.
 - GM and CRA will continue discussions and arrange to meet with IDNR to resolve issues. Additional information in regards to the stream restoration will be submitted in September.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

The following is a list of anticipated work for the next reporting period:

- Bat Mist Netting Survey Report to be submitted (continuing progress);
- Obtaining Access Agreements from residents in the affected area (continuing progress);
- Coordination of Tree Removal Activities with U.S. EPA and USFWS for portions of the creek downstream of Parcel 22 (continuing progress);
- Coordination with USACE and IDEM for work in the stream channel (continuing progress);
- Initiation of excavation activities, assuming appropriate access agreements are obtained;
- GM is preparing the Biological Assessment requested by USFWS and additional information regarding creek cleanup and restoration for IDEM Water Quality Division; and
- Removal Action activities along the stream are expected to continue, starting with the upstream section first and then proceeding downstream, assuming that access can be obtained from residents and agreement is reached with IDEM Water Quality Division.

ATTACHMENT A

DELIVERABLES SUMMARY

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<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		
Draft Downstream Workplan	AOC VIII.34.d; VIII.35.a	90 days AED	October 29, 2003	in progress
Draft Site Source Control Workplan	AOC VIII.34.e; VIII.35.a	15 business days AED	August 21, 2003	submitted August 21, 2003
Monthly Progress Reports	AOC VIII.39.a	1 st 30 days AED 15 th of each month thereafter	August 30, 2003	submitted August 19, 2003 submitted September 11, 2003
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