



**CONESTOGA-ROVERS  
& ASSOCIATES**

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## RCRA Facility Investigation and CERCLA Removal Action

### Quarterly Progress Report 52 First Quarter 2014

GM CETC – Bedford Facility  
105 Gm Drive  
Bedford, Indiana

EPA ID# IND006036099  
AOC Docket No. V-W-'03-C-747

Prepared for: GM LLC

### **Conestoga-Rovers & Associates**

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**Table of Contents**

	<b>Page</b>
<b>Section 1.0 Introduction.....</b>	<b>1</b>
<b>Section 2.0 List of Completed Activities .....</b>	<b>1</b>
<b>Section 3.0 Summaries of all Problems and Planned Resolutions .....</b>	<b>3</b>
<b>Section 4.0 Summaries of all Changes Made in the Corrective Action (CA) During the Reporting Period .....</b>	<b>4</b>
<b>Section 5.0 Community Relations .....</b>	<b>4</b>
<b>Section 6.0 Changes in Personnel During the Reporting Period .....</b>	<b>4</b>
<b>Section 7.0 Projected Work for the Next Reporting Period.....</b>	<b>5</b>
<b>Section 8.0 Copies of Daily Reports, Inspection Reports, Laboratory/Monitoring Data .....</b>	<b>5</b>

**List of Tables  
 (Following Text)**

Table 2.1	Spring 018 Sampling Results
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**Quarterly Progress Report  
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## Section 1.0 Introduction

This Quarterly Progress Report is submitted by General Motors LLC (GM) in accordance with the Bedford Performance-Based Corrective Action Agreement (Agreement), executed on March 20, 2001, and modified on October 1, 2002, March 29, 2007, and May 9, 2008; and 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, as amended for quarterly reporting by U.S. EPA approval, September 14, 2012. This report covers the period of the first calendar quarter of 2014 for the Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) Project and the CERCLA Removal Action (RA) at the GM Castings, Engines, Transmissions, and Components (CETC; formerly Powertrain) – Bedford Facility (Facility) and select surrounding properties (Site), Bedford, Indiana.

The next RCRA/CERCLA quarterly progress report covering the Second Quarter of 2014 will be submitted on or before July 15, 2014.

## Section 2.0 List of Completed Activities

The following activities took place and the following documents were prepared and distributed during this quarter:

- Maintenance of storm water and erosion controls continued on an as-needed basis.
- Collection of Spring 018 water was suspended starting June 19, 2013 and spring water was allowed to flow directly to the creek as approved by U.S. EPA and IDEM on June 18, 2013. Ongoing monthly monitoring of the Spring continues. The Severson Environmental Services (SES) water treatment plant (WTP) ceased operating on June 19, 2013 and was placed into a standby mode.
  - Results for samples collected from Spring 018 during the quarter are presented in Table 2.1. Sample results for the monthly sampling were previously emailed to U.S. EPA and IDEM. As of the March 2014 sampling, the 12-month rolling average is 0.15 micrograms per liter ( $\mu\text{g/L}$ ).
  - Construction Certification Report documenting the concrete sealing construction for Bailey's Branch Creek and Tributary 3 completed as part of the Spring 018 Interim Measure was submitted to U.S. EPA on February 20, 2014.
  - SES WTP demobilization and Spring 018 contingency plan memorandum was revised and re-submitted to the U.S. EPA on February 24, 2014.

- U.S. EPA approved the demobilization plan on March 10, 2014.
- The demobilization plan was initiated in March 2014 and will continue into the second quarter 2014.
- The East Plant Area Vault Construction Certification Report was submitted to the U.S. EPA on January 8, 2014.
- On March 18, 2014, U.S. EPA submitted comments on the Vault 2012 Annual Report, the Vault Post-Closure Plan, and the Vault Construction Certification Report.
- U.S. EPA submitted comments on the First Half 2013 Environmental Indicator (EI) CA750 Monitoring on January 9, 2014.
  - EI CA750 Quarterly static groundwater level measurements for the First quarter were completed February 26 to February 27, 2014.
  - The EI CA750 Second Half 2013 Results Memorandum and responses to the comments on the First Half 2013 Results Memorandum was submitted March 11, 2014.
  - U.S. EPA provided comments on the EI CA750 Second Half 2013 Results Memorandum and the First Half 2013 responses on March 20, 2014, and March 21, 2014.
- U.S. EPA and GM continued discussions on a RCRA Corrective Action Order for the Site.
  - GM submitted a revised draft of the proposed RCRA Order to U.S. EPA on December 2, 2013.
  - A meeting was held between GM and the U.S. EPA on January 28, 2014 to discuss the latest draft of the RCRA Order.
  - Subsequent to the January 28, 2014 RCRA Order meeting discussion with U.S. EPA, GM submitted a revised draft RCRA Order to U.S. EPA on March 10, 2014.
  - U.S. EPA e-mailed their comments on the revised proposed draft RCRA Order to GM on March 21, 2014. GM is reviewing the comments.
  - GM and U.S. EPA held a call on April 10 to discuss the draft RCRA Order. GM will provide a revised draft based on those discussions.
- The design of the Pilot perimeter groundwater collection trench is ongoing. GM has acquired properties on Barlow Lane for the installation of the groundwater collection trench, and a motion was approved by Bedford City Council to vacate Barlow Lane in advance of trench installation activities. Several of the houses acquired have been demolished in preparation for the trench construction.
- Conference calls were held with U.S. EPA and IDEM on January 9 and 29, February 13 and 25, and March 13 and 27, 2014, to discuss items related to the project.
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings are held the first Tuesday of the

month on January 7, February 4, and March 4, 2014. Tailgate safety meetings are held daily for both the consultant and the contractor.

- The RCRA/CERCLA Quarterly Progress Report #51, covering the fourth Quarter of 2013, was submitted to the U.S. EPA and IDEM on January 14, 2013.

### **Section 3.0 Summaries of all Problems and Planned Resolutions**

- In conformance with GM's NPDES Permit IN0003573 monthly compliance samples are collected from the effluent of the storm water treatment plant (WTP) located adjacent to the storm water lagoon. Storm water is collected within the lagoon and treated as necessary. During operation of the WTP on March 11, 2014 a monthly compliance sample of the effluent was collected and submitted to the laboratory for analysis of PCBs. On March 14, 2014 the analytical laboratory verbally notified GM that the result for the compliance sample was in excess of the NPDES Permit discharge criteria of 0.3 µg/L with a reported PCB concentration of 0.43 µg/L. The WTP was not in operation at the time of the receipt of the analytical results. GM left the WTP in stand-by mode and performed additional testing of the treatment system while discharging effluent to the storm water pond. Additional test results of the effluent from this testing were less than the discharge criteria. Ultimately, GM expedited the change out of the carbon from the four storm water treatment vessels to ensure optimal performance of the treatment system from March 29 through April 1, 2014. Samples collected from the discharge on April 2, and April 3, 2014, were both non-detect for PCBs. IDEM has been kept informed of the progress.
- As of the end of December 2013 the restoration work on Pleasant Run Creek is almost complete with a few minor items to be finished on Parcel's 40 and 81 (grading out of some low spots and seeding of the diversion channel and portions of the east berm on Parcel 40, and planting trees on Parcel 81). Weather this winter delayed the completion of these items prior to this spring and resulted in RACER Trust's contractor leaving the Site without completing these activities. GM is currently assessing the amount of work remaining and discussing options for completion with the RACER Trust and the property owner.

### **Section 4.0 Summaries of all Changes Made in the Corrective Action (CA) During the Reporting Period**

The following changes were made to the CA during the reporting period:

- Submission of the East Plant Area Vault Construction Certification Report on January 8, 2014

- Submission of the Bailey's Branch Creek and Tributary 3 Concrete Sealing Construction Certification Report on February 20, 2014
- Submission of the SES WTP demobilization and Spring 018 contingency plan memorandum on February 24, 2014
- Initiation of the SES WTP demobilization plan in March 2014 following approval of the plan on March 10, 2014

## Section 5.0 Community Relations

The telephone number for public contact is 812-277-8954 (Katie Kamm, Conestoga-Rovers & Associates [CRA]). Individual meetings can be arranged to discuss project progress with residents as requested.

The next neighborhood/public meeting and CLP meetings are tentatively scheduled for the week of June 16, 2014. Presentations for past meetings are posted on the GM website at: [www.bedfordpowertraincorrectiveaction.com](http://www.bedfordpowertraincorrectiveaction.com)

The document repository continues to be located at the Bedford Public Library, with relevant project related documents available on compact disc (CD) in PDF format. Information will be updated periodically, as new documents become available. All data located in the Library repository can also be found on the aforementioned website.

## Section 6.0 Changes in Personnel During the Reporting Period

Oversight personnel for CRA and SES remain unchanged. Most staff left the Site for the season outside of the water treatment duties. SES demobilization of their WTP has commenced and should be completed early in the second quarter 2014.

## Section 7.0 Projected Work for the Next Reporting Period

Work anticipated for the next reporting period includes:

- Continue maintenance of erosion controls as needed of the East Plant Area Cover System.
- Sample Spring 018 monthly in accordance with the monitoring schedule
- Rehabilitate vegetative cover on the East and West Plant Area Cover Systems in accordance with recommendations from JF New and SES's landscape subcontractor

- Resolve remaining items in restoration of Parcels 40 and 81
- The next round of EI CA750 static groundwater level measurements and water quality samples is scheduled to be completed in May 2014
- Submit the EI CA750 First Half 2014 Results Memorandum
- Submit responses to US EPA's comments on the EI CA750 second half 2013 results
- Complete the pilot perimeter trench design
- Complete a work plan addendum to perform additional on-site sampling for the RCRA Facility Investigation Report
- Submit Downstream Parcels Soil Removal Construction Certification Report
- Continue the discussions on the Order with U.S. EPA

## **Section 8.0 Copies of Daily Reports, Inspection Reports, Laboratory/Monitoring Data**

Table 2.1 presents the results from Spring 018 sampling.

Additional packages of analytical data have been and will be submitted to U.S. EPA once the validated data became available.

TABLE 2.1

**SPRING 018 SAMPLING RESULTS - OCTOBER/NOVEMBER/DECEMBER 2013  
GM CETC BEDFORD FACILITY  
BEDFORD, INDIANA**

Sample Area		<i>P015</i>	<i>P015</i>	<i>P015</i>
Sample Location		<i>Spring 018C</i>	<i>Spring 018C</i>	<i>Spring 018C</i>
Sample Identification		<i>SW-015-010814-GS-39988</i>	<i>SW-015-021114-GS-39994</i>	<i>SW-015-031214-GS-39997</i>
Sample Date		<i>1/8/2014</i>	<i>2/11/2014</i>	<i>3/12/2014</i>
	<i>Units</i>			
<b>PCBs</b>				
Aroclor-1016 (PCB-1016)	µg/L	0.20 U	0.19 U	0.19 U
Aroclor-1232 (PCB-1232)	µg/L	0.20 U	0.19 U	0.19 U
Aroclor-1242 (PCB-1242)	µg/L	0.20 U	0.059 J	0.19 U
Aroclor-1248 (PCB-1248)	µg/L	0.20 U	0.19 U	0.18 J
Aroclor-1254 (PCB-1254)	µg/L	0.20 U	0.19 U	0.19 U
Aroclor-1260 (PCB-1260)	µg/L	0.20 U	0.19 U	0.19 U
Total PCBs	µg/L	ND	0.059 J	0.18 J
<b>General Chemistry</b>				
Total suspended solids (TSS)	µg/L	8000	19000	4000

## Notes:

U - Not present at or above the associated value.

J - Result is less than the RL (reporting limit) but greater than or equal to the MDL (method detection limit) and the concentration is an estimated value.  
December 11, 2013 Sampling Results are unvalidated