

RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #28 FIRST QUARTER 2008

**GM POWERTRAIN - BEDFORD FACILITY
105 GM DRIVE
BEDFORD, INDIANA**

EPA ID# IND006036099

**Prepared For:
General Motors Corporation**

APRIL 15, 2008

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**QUARTERLY PROGRESS REPORT
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1.0 INTRODUCTION

This Quarterly Progress Report is submitted in accordance with the Bedford Performance-Based Corrective Action Agreement (Agreement) between the United States Environmental Protection Agency (U.S. EPA) and General Motors Corporation (GM), executed on March 20, 2001, and modified on October 1, 2002, February 28, 2007, and February 27, 2008. This report covers the period of the first calendar quarter of 2008 for the GM Powertrain - Bedford Facility (Facility), Bedford, Indiana. Some of the activities conducted as part of the overall Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) work are being addressed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action (RA) Program, pursuant to the Administrative Order on Consent (AOC) between U.S. EPA and GM (effective July 31, 2003). These activities are described in more detail within the CERCLA Monthly Progress Reports referred to herein.

The next quarterly progress report, covering the Second Quarter of 2008, will be submitted on or before July 15, 2008.

2.0 LIST OF COMPLETED ACTIVITIES

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

- Conference calls were held with U.S. EPA, Indiana Department of Environmental Management (IDEM), the Agency for Toxic Substance and Disease Registry (ATSDR), and Indiana State Department of Health (ISDH) on January 8; February 5, and 19; and March 4, and 20, to discuss project progress (United States Fish and Wildlife Service (USFWS) was also invited to attend the update calls);
- The Annual Project Status Meeting and Site Tour with U.S. EPA and IDEM were held on January 24 in Bedford. At the Meeting the work completed in 2007 and the projected work and schedule for 2008 were discussed;
- Fact Sheet 19 was released to the Public and U.S. EPA on February 27;
- Information sessions for the public were held at the Facility March 11 and 13. The March 11 meeting was to discuss issues related to project truck traffic on public roads. The March 13 meeting was the regular quarterly project update meeting;
- The Community Liaison Panel (CLP) met March 14;
- Air monitoring was conducted for construction activities in the East Plant Area, and the Northern Tributary. Air monitoring results completed for work in the East Plant Area are presented in Tables 2.1 (PCB) and 2.2 (TSP). Figure 2.1 presents the sampling locations in the Northern Tributary and the East Plant Area;
- Comments were received from U.S. EPA concerning proposed work in the West Plant Area on January 8. A conference call regarding the comments was held on January 9. An email summarizing responses given during the conference call was sent to U.S. EPA on January 11:
 - A scope of work was submitted January 10 for additional drilling completed in Area of Interest (AOI) 21 area 2 (AOI 21-2) in January 2008. Results of the sampling were submitted to U.S. EPA on January 28;
 - A memo was sent to U.S. EPA on January 22 in response to outstanding comments regarding the West Plant Area Interim Measure (IM);
 - A figure presenting GM's West Plant Area utilities in the area of AOI 21-2 and field locates for comparison were submitted to U.S. EPA on February 8; and
 - On March 5, a memo was submitted to U.S. EPA in response to U.S. EPA comments sent January 29 and February 19 regarding the results of sampling in AOI 21-2 as part of the West Plant Area IM;

- AOI 8 IM Work Plan was submitted to the U.S EPA on January 22:
 - Comments for the AOI 8 IM were received February 11. Responses were submitted February 20; and
 - Additional U.S. EPA comments regarding the AOI 8 IM Work Plan were received on March 17;
- Aerial photographs taken in January 2008 were submitted to U.S. EPA on January 31;
- The Western Tributary IM Construction Certification Report was submitted to U.S EPA on March 3;
- Preliminary results for borings completed on Parcel 400 were submitted to U.S. EPA on March 25. U.S. EPA was notified that based on initial sample results additional delineation would be required on neighboring parcels;
- A memo was sent on January 4 to U.S. EPA in response to comments received to date for the Draft Environmental Indicator (EI) CA750 Determination and Fluorescein dye detections at Spring 018:
 - On February 12, a memo was submitted to U.S. EPA regarding the response to U.S. EPA comments on the Draft EI CA750 Determination received on January 8; and
 - On March 10, a Memo was submitted to U.S. EPA in response to comments on the Draft EI CA750 Determination received on March 3;
- GM Bedford Plant drawings, including storm sewer, sanitary sewer, process sewer, city water, fire water, and gas, were submitted to U.S. EPA on March 7;
- Parcels 201 and 204 Interim Measures Work Plan was submitted to U.S. EPA on March 3:
 - An email was sent to U.S. EPA on March 4 regarding monitoring well abandonment at Parcel 201; and
 - Comments were received from U.S. EPA on the Parcel 201 and 204 IM Work Plan on March 31;
- Revised Northern Tributary Restoration Drawings were submitted to U.S. EPA on February 21;
- Heavy rain events on March 18/19 and March 27 through April 4 created stormwater management issues. Spring 018 was removed from the treatment process twice during these high water events. An Reportable Quantity was not exceeded either time. During the first event, detention basin #4 sent some water directly to the creek. Sampling downstream will be completed to evaluate whether additional cleaning of those areas will be needed. Appropriate notifications were made to

Federal and State authorities. Additional stormwater controls have been placed in the East Plant Area to help manage stormwater;

- A letter was sent to Kathy Simonson at IDEM on February 4 requesting No Further Action (NFA) for five underground storage tanks (USTs) at the South Piston Yard:
 - A Conditional NFA approval was received from IDEM on March 20;
- Data were submitted to U.S. EPA, IDEM and USFWS on March 30 regarding the summary of monitoring data for leachate collection and leak detection systems;
- A letter was sent to U.S. EPA requesting an extension for the submittal of the Final Corrective Measures Proposal on February 27;
- An application amendment for the East Plant Area Rule 5 Permit was submitted to Mr. Wade Blackwell of the City of Bedford on March 4;
- An explanation of sediment controls on the ditch north of the East Plant Area fill areas was submitted to U.S. EPA on March 10;
- An aerial photograph was submitted to U.S. EPA on March 11;
- Placement of creek RA <50 mg/kg PCB material in the East Plant Area was halted during January and February 2008 but restarted in March 2008; and
- The January 2008, February 2008, and March 2008 CERCLA RA Monthly Progress Reports were submitted during the First Quarter of 2008. Quarterly Progress Report #27 for the Fourth Quarter of 2007 was submitted January 14.

3.0 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 response to U.S. EPA comments regarding the Draft EI CA750 Determination on January 4;
- Submission of response to U.S. EPA comments regarding the West Plant Area work on January 11;
- Submission of response to U.S. EPA comments regarding the West Plant work on January 22;
- Submission of the AOI 8 IM Work Plan on January 22;
- Submission of select January 2008 aerial photographs on January 31;
- Submission of request for NFA for USTs at the south piston yard on February 4;
- Submission of a figure presenting completed utility locates for AOI 21-2 on February 8;
- Submission of response to U.S. EPA comments regarding the Draft EI CA750 Determination on February 12;
- Submission of revised Northern Tributary restoration drawings on February 21;
- Submission of a request for an extension to the Corrective Measures Proposal on February 27;
- Publication of Fact Sheet 19 on February 27;
- Submission of the Western Tributary IM Construction Certification Report on March 3;
- Submission of response to U.S. EPA comments on the West Plant Area IM on March 3;
- Submission of notice for wells to be abandoned on Parcel 201 on March 4;
- Submission of Amendment to the East Plant Area Rule 5 Permit on March 4;
- Submission of Rule 5 Application Amendments to Mr. Wade Blackwell at Bedford Utilities on March 5;
- Submission of utility drawings for the GM Powertrain Bedford Plant on March 7;
- Submission of response to U.S. EPA comments on the Draft EI CA750 Determination on March 10;

- Submission of a description of East Plant Area sediment controls on March 10;
- Submission of an aerial photograph on March 11;
- Receipt of a Partial NFA approval on March 20;
- Submission of preliminary Parcel 400 boring results on March 25; and
- Submission of leachate collection and leak detection systems data on March 30.

4.0 COMMUNITY RELATIONS

GM continues to maintain the toll free information telephone number. Individual meetings can also be arranged to discuss sampling results with individual residents as requested.

Quarterly meetings to review project status, are held both with the neighbors along the creek and around the plant, as well as with the general public. Quarterly meetings were held during this reporting period on March 11, 12, and 13, 2008, at the Bedford Facility. The meetings were held from 6:30 PM to 8:00 PM at the Bedford Facility. The meeting held on March 11 was an information session regarding project truck traffic. Meetings held on March 12 and 13 were held as regular project update information sessions. Presentations for the meetings are posted on the web site at www.bedfordpowertraincorrectiveaction.com. The next set of public meetings will be held in June 2008 on a date to be determined.

Fact Sheet 19 was issued on February 27, 2008.

The CLP meeting occurred in this quarter on March 14, 2008. The CLP was formed to provide additional communication avenues for the community and the meetings are currently being held at the GM Facility approximately every three months or more frequently if information on the project changes significantly. The CLP meeting minutes are posted on the GM website at www.bedfordpowertraincorrectiveaction.com. The next CLP meeting is scheduled for June 2008 on a date to be determined.

The Information Center, located at the plant lobby, is available by appointment through Ms. Becki Akers, GM Communications, at the project toll free number 866-223-0856. The repository located at the Bedford Public Library remains open at normal business hours. All data in the repository are also located on the aforementioned web site.

5.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

A number of field personnel have been rotated in and out of the field activities.

6.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

Work projected for the next reporting period includes:

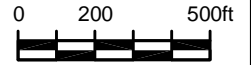
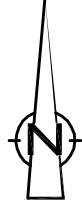
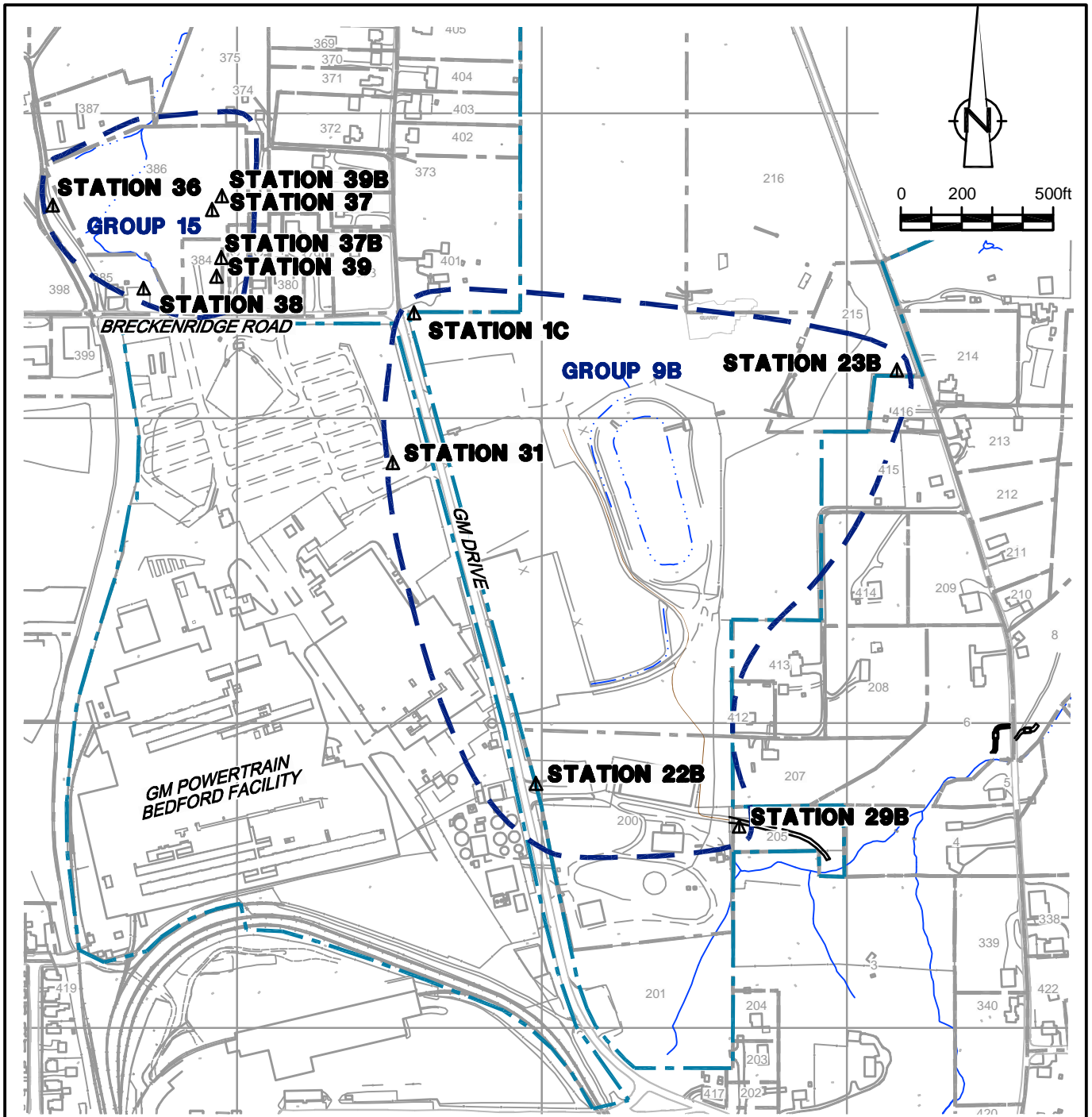
- Conducting a neighborhood information session in June 2008 on a date to be determined;
- Conducting a general public information session in June 2008 on a date to be determined;
- Conducting a CLP Meeting in June 2008 on a date to be determined;
- Preparing and distributing Fact Sheet 20 in the next quarter;
- Continuing with RA activities on downstream parcels;
- Continuing the evaluation of RFI soil and groundwater data as needed;
- Submitting the EI CA750 Determination;
- Completing the Northern Tributary IM Construction Certification Report;
- Commencing work as outlined in the West Plant Area IM Work Plan, pending Work Plan and excavation design approvals;
- Continuing delineation of fill in Parcel 400 and completing the Parcel 400 IM Work Plan;
- Submitting a final Work Plan and excavation design for the West Plant Area IM;
- Continuing construction of the vault cover;
- Continuing placement of the <50 mg/kg PCB RA soils in the East Plant Area as grading fill beneath the landfill cover system;
- Modifying the East Plant Cover System design to address additional soil placement (as needed); and
- Submitting a revised AOI 8 NAPL recovery plan.

**7.0 COPIES OF DAILY REPORTS, INSPECTION REPORTS,
LABORATORY/MONITORING DATA**

Northern Tributary verification sample locations are presented on Figure 7.1. Sample results validated to date are presented in Table 7.1.

Parcel 400 delineation sample locations are presented on Figure 7.2. Validated sample results are presented in Table 7.2.

Packages of analytical data from creek remediation verification sampling have been submitted monthly as they become available, after validation, in the monthly reports prepared for the CERCLA AOC, and will continue to be submitted during the next reporting period. Any other sampling data collected during the quarter will be submitted under separate cover once validation is completed.



SOURCE: BASE MAP COMPLETED BY AIR-LAND SURVEYS, FLINT, MI, APRIL 2001.

NOTES: 1) PROPERTY BOUNDARY LOCATIONS APPROXIMATED FROM THE LAWRENCE COUNTY SURVEY PLATS. LOCATIONS MAY NOT ACCURATELY REPRESENT THE TRUE BOUNDARIES

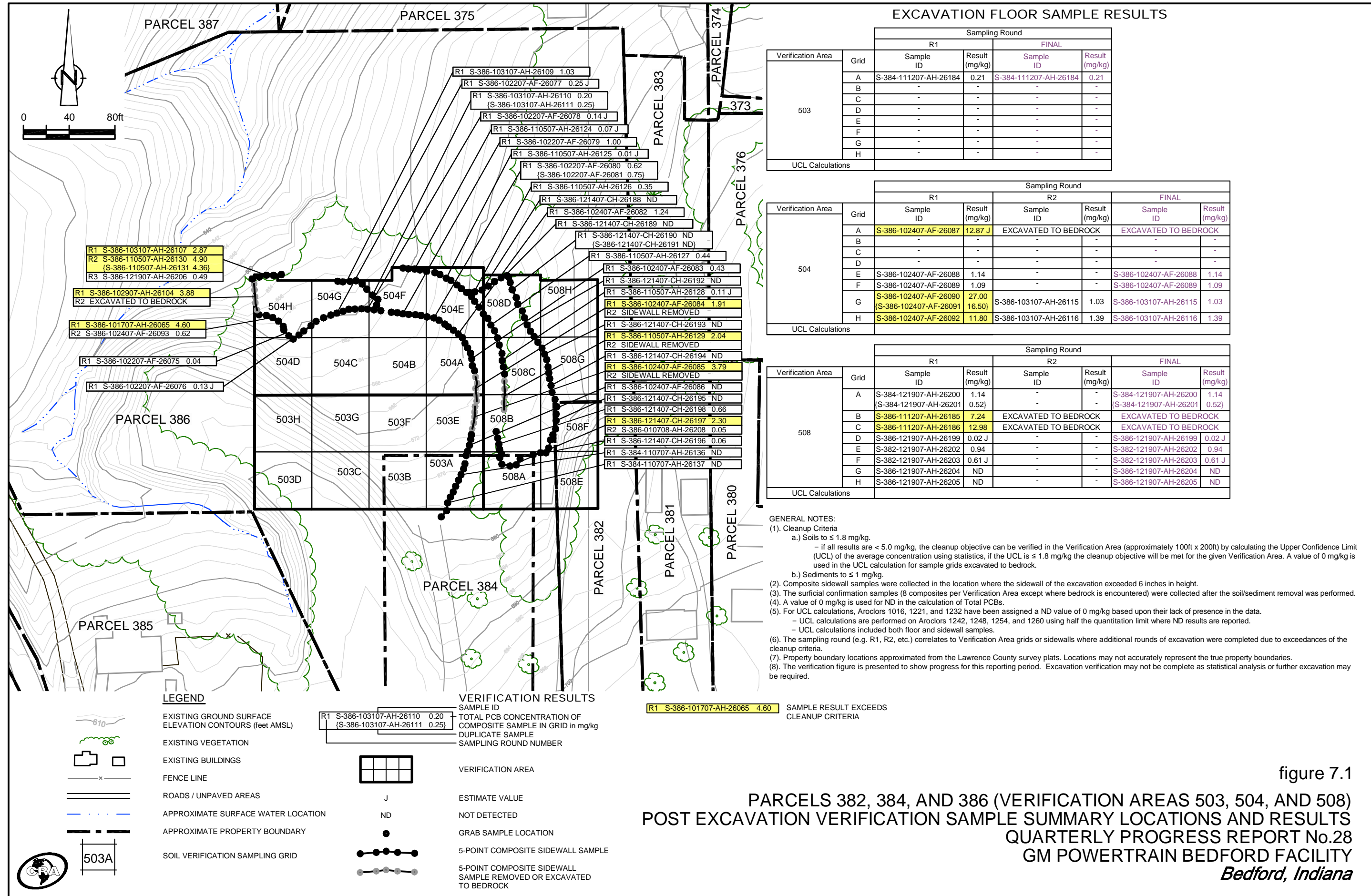
LEGEND

- | | | | |
|--|------------------------------------|--|---|
| | EXISTING BUILDINGS | | APPROXIMATE GM PROPERTY BOUNDARY |
| | FENCE LINE | | STATION 23 AIR SAMPLING LOCATION |
| | RAILROAD TRACKS | | AIR SAMPLING GROUP |
| | DIRT ROADS | | |
| | ROADS / PAVED AREAS | | |
| | APPROXIMATE SURFACE WATER LOCATION | | |
| | APPROXIMATE PARCEL BOUNDARY | | |

figure 2.1

**EAST PLANT AREA AIR MONITORING STATIONS
QUARTERLY PROGRESS REPORT No.28
GM POWERTRAIN BEDFORD FACILITY
Bedford, Indiana**





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.
- The verification figure is presented to show progress for this reporting period. Excavation verification may not be complete as statistical analysis or further excavation may be required.

figure 7.1
PARCELS 382, 384, AND 386 (VERIFICATION AREAS 503, 504, AND 508)
POST EXCAVATION VERIFICATION SAMPLE SUMMARY LOCATIONS AND RESULTS
 QUARTERLY PROGRESS REPORT No.28
 GM POWERTRAIN BEDFORD FACILITY
 Bedford, Indiana

