

RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #36 FIRST QUARTER 2010

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

EPA ID# IND006036099

**Prepared For:
General Motors LLC**

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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 LLC (GM), executed on March 20, 2001, and modified on October 1, 2002, March 29, 2007, and May 9, 2008. This report covers the period of the first calendar quarter of 2010 for the GM Castings Transmissions Engines and Components (CTEC, formerly 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) 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 Progress Reports referred to herein.

The next quarterly progress report, covering the Second Quarter of 2010, will be submitted on or before July 15, 2010.

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 and the Indiana Department of Environmental Management (IDEM) on January 7 and 25; February 11 and 26; and March 11 to discuss project progress. Representatives for the Agency for Toxic Substance and Disease Registry (ATSDR) and U.S. Fish and Wildlife Service (USFWS) were also invited to the call.
- Information sessions for the public were held on March 17 and 18, 2010, at the CRA Field Trailer. The Community Liaison Panel (CLP) met March 19, 2010.
- Fact Sheet 27 was published on March 10, 2010.
- On January 18, 2010, U.S. EPA and IDEM were notified that some of the verification sample results collected from the excavation on Parcel 36 exhibited concentrations in excess of 50 mg/kg for PCBs. The material from the areas with exceedences were all contained in one truck load of approximately 19 tons, which had been placed in the East Plant Area grading fill area in Area of Interest (AOI) 15 on January 14, 2010. Upon receiving the preliminary verification results on Saturday, January 16, no further excavation on Parcel 36 was conducted until the ≥ 50 mg/kg PCB soil could be removed from the East Plant Area and sent to Heritage Landfill.
 - On January 20, 2010, figures depicting the Parcel 36 excavation area and composite sample locations and preliminary sample results were sent to U.S. EPA and IDEM via e-mail.
 - Potential ≥ 50 mg/kg PCB soil in AOI-15 was segregated in a bermed area within the East Plant Area and covered and the excavation on Parcel 36 was also covered with temporary liners. The ≥ 50 mg/kg PCB material from AOI-15 and the Creek were removed in February 2010 once weather conditions allowed for safe travel of transport trucks. Two truck loads of the soil were removed from AOI-15 and 5 truckloads of ≥ 50 mg/kg PCB material were removed from the Parcel 36 Creek excavation for a total of 136.1 tons transported for disposal at the Heritage Landfill near Roachdale, Indiana.
 - A 5-point composite sample was collected from the former stockpile location at AOI-15 to confirm that no ≥ 50 mg/kg PCB material remained in the grading area. Post excavation verification samples from the Parcel 36 excavation confirmed that the ≥ 50 mg/kg PCB soil had been removed from that impacted

area. A sketch of the AOI-15 excavation base sample locations and corresponding laboratory data for the AOI-15 base samples were e-mailed to U.S. EPA on March 11, 2010.

- An initial memo summarizing the investigation of the Sample 2090 Area was submitted to U.S. EPA and IDEM on February 11, 2010.
- The memo summarizing the investigation submitted to U.S. EPA and IDEM on February 19, 2010, concluded that no additional investigative or remedial work in the Sample 2090 Area was warranted. This was based on the lack of exceedance in any of the new delineation sampling results, including those taken from the location and depth of the previous criteria exceedance.
- During the February 26, 2010, conference call, U.S. EPA agreed that no further action related to the Sample 2090 area was warranted.
- A summary of results for water samples collected from Spring 018 from May 2002 through February 2010 was e-mailed to U.S. EPA on March 11, 2010, per U.S. EPA's request.
- U.S. EPA and IDEM attended a meeting at the Site with GM to discuss AOI-8 on March 17, 2010. The meeting was preceded by a tour and a call-in number was opened for those not able to attend the meeting in Bedford.
 - As a result of the meeting, additional monitoring well locations (west and north) to further bound the lateral extent of the NAPL-groundwater contamination at AOI-8 will be investigated. A Work Plan will be developed by GM for the periodic removal of oil from CH-5 which will be submitted for agency review. The Work Plan will describe the method of removal and a description of recording on how the recovery and recharge rates and monitor water levels in nearby wells will be recorded to determine any potential influences from the recovery efforts at CH-5. A suggestion was made by U.S. EPA to review the potential use of a hydrophysics downhole geophysics technique in further evaluating the fractures in the AOI-8 area. GM will evaluate this method and respond to U.S. EPA regarding its use at the Bedford Site.
- On March 25, 2010, an article from the Bedford Times Mail published on March 19, 2010, was sent via e-mail to U.S. EPA. The article summarized items discussed at the Public Meeting held on March 18, 2010.
- The CERCLA RA Progress Report covering November/December 2009 and January/February 2010 were submitted during the First Quarter of 2010.

**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:

- Publication of Fact Sheet 27 on March 10, 2010.

4.0 COMMUNITY RELATIONS

The telephone number for public contact is 812-277-8954 (Katie Kamm, CRA). Individual meetings can also be arranged to discuss sampling results with 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 covering the First Quarter were held on March 17 and 18, 2010. The meetings were regular project update information sessions from 6:30 PM to 8:00 PM at the CRA Field Trailer. Presentations for the meetings are posted on the GM website at www.bedfordpowertraincorrectiveaction.com. Public meetings for the Second Quarter of 2010 are tentatively scheduled for June 2010 on a date to be determined.

Fact Sheet 27 was issued on March 10, 2010.

The CLP meeting covering the First Quarter was held on March 19, 2010. The CLP was formed to provide additional communication avenues for the community and the meetings are currently being held at the CRA construction trailer approximately every three months or more frequently if information on the project changes significantly. Previous CLP meeting minutes can be reviewed on the GM website at www.bedfordpowertraincorrectiveaction.com. The CLP meeting covering the Second Quarter 2010 is tentatively scheduled for June 2010 on a date to be determined.

The Information Center located at the plant lobby is accessible by appointment through Ms. Katie Kamm, at the project phone number 812-277-8954. The documents repository is no longer located at the Bedford Public Library. All data that were located at the Library repository can be found on the aforementioned web site.

5.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

Additional contractor personnel left the Site in January 2010 after completion of remaining planned construction work for the season. After the seasonal Site closure, some CRA staff and contractor personnel remained on site to continue necessary sampling programs, operate water treatment facilities, and provide personnel and oversight for maintenance activities.

6.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

Work projected for the next reporting period includes:

- Holding the annual GM Bedford status/update meeting with U.S. EPA and IDEM on April 21, 2010 to discuss the planned construction schedule. A Site tour will be given on April 20, 2010.
- Conducting a general public information session in June 2010.
- Conducting a CLP Meeting in June 2010.
- Preparing and submitting the Annual Compliance Report for the East Plant Area Vault Covering Calendar Year 2009 by July 15, 2010.
- Placing grading fill in AOI-15. The grading area will remain open, weather permitting, to receive soil from the Downstream Parcels excavation on Parcel 36 near Bud Ikerd and Peerless Roads.
- Completing agreements with MLC for properties owned by MLC in order to conduct remaining investigative, remedial and monitoring work on the MLC properties.
- Preparing and distributing Fact Sheet 28.
- Conducting EI CA750 groundwater monitoring and sampling, pending access.
- Maintaining temporary liner covers and runoff water collection and treatment where necessary.
- Preparing the Final RFI Report.
- Preparing the Final Corrective Measures Proposal.

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

Packages of analytical data from creek remediation verification sampling have been submitted as they become available and will continue to be submitted during the next reporting period when or if sampling is conducted. Any other sampling data collected during the quarter will be submitted under separate cover once validation is completed.