

GENERAL MOTORS LLC

**GM CETC 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*

**CERCLA PROGRESS REPORT
MARCH/APRIL 2011**

May 13, 2011

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1.0 INTRODUCTION

This 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 (United States Environmental Protection Agency (U.S. EPA) Docket No.: V-W-'03-C-747) effective July 31, 2003, and with the reporting modification approved August 11, 2009, to submit CERCLA Progress Reports bi-monthly.

The next Progress Report, for the months of May/June 2011, will be submitted on or before July 15, 2011.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- An agreement between GM and MLC for GM to complete the remaining creek soil removal work on MLC property (Staging Area G Parcel 39) was previously signed and approved in early August 2010. The remaining small impacted area is present under the clay liner in the former Staging Area 'G'. The Downstream Parcels Removal Action Work Plan: Addendum No. 3, covering this remaining removal, was submitted to U.S. EPA on February 15, 2011 and approved on March 31, 2011. Mobilization and placement of clay over the North Lawrence Water Authority (NLWA) waterline was completed in April 2011. Precipitation and resulting flooding has delayed the removal work in the area. Clay remains over the areas to be removed.
- Maintenance of storm water and erosion controls in this area continued on an as-needed basis.
- Spring 018 water continues to be collected and treated by SES's on-Site water treatment system. Sample results from SES's water treatment system during March/April 2011 are provided in Table 1.
- Detailed design of the French-drain to divert clean water away from Spring 018, thereby reducing the volume of water produced by Spring 018 continued during this reporting period.
- Conference calls were held on March 1, 17 and 31, and April 14 and 29, with U.S. EPA and the Indiana Department of Environmental Management (IDEM) to discuss items related to the RA and the design and construction of the East Plant Area Interim Measures (IM).
- On-Site construction meetings for the reporting period have been held informally daily and formally as needed. Formal SES construction meetings were held on March 1, 8, 15, 22, and 29 and on April 5, 12, 19, and 26. Tailgate safety meetings are held daily for both the consultant and the contractor.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- Excavation of creek and floodplain soils remaining on Parcel 39A beneath the Staging Area G soil stockpile will not begin until spring 2011, after the spring rainy seasons. Some material from the clean clay pad has been moved and placed over the NLWA waterline adjacent to the former staging pad to facilitate access by NLWA. Clay remained in place over the remaining PCB impacted soil through the recent significant rain events. Work in the area is on hold until the work area dries out enough to complete the final excavation.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Initiate removal of remaining impacted creek material once the work area dries out.
 - Continue to manage and treat storm water as needed, continue to collect and treat Spring 018 water, and continue maintenance of erosion controls.
 - Complete detailed design of Spring 018 groundwater diversion trench and submit to U.S. EPA and IDEM for review.
 - Completion of additional restoration work on Parcel 36, in conjunction with the new owner's planting plans and IDEM approval following agreement to the IDEM request for additional buffer between the wetland and the crop area
 - Complete design for restoration repairs on property north of Broomsage Road.
 - Annual onsite project status meeting between U.S.EPA, IDEM and GM will occur on May 26 and May 27, 2011.
 - Complete Parcel 22 restoration monitoring in June 2011. Upstream Parcels monitoring is tentatively scheduled, pending U.S. EPA approval of our request to discontinue.

TABLE 1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - MARCH/APRIL 2011
GM CETC BEDFORD FACILITY
BEDFORD, INDIANA

<i>Sample Date</i>	<i>Analysis</i>	<i>Influent</i>	<i>After Sand Filter 1</i>	<i>After Sand Filter 2</i>	<i>Between Carbons 1 & 3</i>	<i>Between Carbons 2 & 4</i>	<i>Effluent</i>
3/2/2011	PCB (ug/L)	0.11	ND (0.10)	(0.10) / ND (C	ND (0.10)	ND (0.10)	ND (0.10)
	Turbidity (NTU)	4.10	1.01	0.82 / 0.84	0.00	0.31	0.46
3/8/2011	PCB (ug/L)	ND (0.10)	--	--	--	ND (0.10)	0.18
	Turbidity (NTU)	5.75	--	--	--	0.00	0.00
3/16/2011	PCB (ug/L)	0.070 J / 0.073 J	--	--	--	ND (0.20)	ND (0.20)
	Turbidity (NTU)	4.21 / 4.19	--	--	--	0.24	0.00
3/22/2011	PCB (ug/L)	0.11 J	--	--	--	ND (0.20)	ND (0.20)
	Turbidity (NTU)	1.49	--	--	--	0.38	0.36
3/30/2011	PCB (ug/L)	0.082 J	--	--	--	ND (0.20)	ND (0.20)
	Turbidity (NTU)	6.87	--	--	--	0.11	0.10
4/6/2011	PCB (ug/L)	0.14 J	0.12 J / 0.12 J	0.11 J	ND (0.20)	ND (0.20)	ND (0.20)
	Turbidity (NTU)	5.90	4.51 / 5.37	3.78	1.94	0.67	0.00
4/13/2011	PCB (ug/L)	0.16 J	--	--	--	ND (0.20)	ND (0.20)
	Turbidity (NTU)	2.81	--	--	--	0.81	0.00
4/20/2011	PCB (ug/L)	1.0 / 0.97	--	--	--	ND (0.20)	ND (0.20)
	Turbidity (NTU)	22.8 / 19.1	--	--	--	0.25	0.00
4/27/2011	PCB (ug/L)	0.11 J	--	--	--	ND (0.20)	ND (0.20)
	Turbidity (NTU)	10.46	--	--	--	1.21	0.53

Note:

1) Bag filters were removed during maintenance/repair of the WTP in April 2010. Effluent now occurs after the final carbon filter

ND - Non detect

"--" - Not Sampled

APPENDIX 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		
Downstream Workplan	AOC VIII.34.d; VIII.35.a	90 days AED	October 29, 2003	complete
Site Source Control Workplan	AOC VIII.34.e; VIII.35.a	Approved November 11, 2003	August 21, 2003	complete
Progress Reports	AOC VIII.39.a	1 st 30 days AED 15 th of every other month thereafter	August 30, 2003	complete
	U.S. EPA Approval Email, August 11, 2009		May 15, 2011	submitted May 13, 2011
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