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

[ANUARY/FEBRUARY 2012]

March 14, 2012

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1.0 INTRODUCTION

This Progress Report covering activities completed in January and February 2012, 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 March/April 2012, will be submitted on or before May 15, 2012.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS PERIOD

- Maintenance of storm water and erosion controls continued on an as-needed basis.
- Spring 018 water continued to be collected and treated by SES's on-Site water treatment system. Sample results from SES's water treatment system during January/February 2012 are provided in Table 1.
- A bedrock drilling program was initiated in October 2011 to install coreholes supporting the detailed design of the bedrock groundwater diversion trench east of Spring 018. The purpose of a bedrock diversion trench would be to divert clean groundwater away from Spring 018, reducing the volume of water produced by Spring 018, and thereby reducing the volume of water that needs to be treated. Drilling was completed in December 2011 and samples were collected from the new coreholes as well as coreholes previously installed as part of the initial Spring 018 investigation. Low level detections of PCBs were found in water samples collected from the new coreholes. GM re-sampled the coreholes on January 25th and 26th, 2012 to confirm the previous detections. Sample results figures and tables for the December 2011 and January 2012 sampling events were submitted to U.S. EPA on February 22, 2012. GM is reviewing the sampling results and is now evaluating additional remedial alternatives for the Spring 018 area. Spring 018 water continues to be collected and treated while the evaluation is ongoing.
- Restoration repairs north of Broomsage Road originally scheduled to be completed late last year have been rescheduled for April, weather permitting.
- The Document Repository at the Plant was disassembled during the last reporting period. Copies of the documents have been put on CD and are available at the Bedford Public Library and will be periodically updated as new documents become available. The website will also continue to be updated and can be accessed at: http://www.bedfordpowertraincorrectiveaction.com.

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• Conference calls were held on January 5 and 20 and February 9 and 23, 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 January 3, 10, 17, 24, and 31; and February 7, 14, 21, and 28. Tailgate safety meetings are held daily for both the consultant and the contractor.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- Preliminary sample results from the coreholes, installed along the proposed clean-water diversion trench at Spring 018 in December 2011, had low-level total PCB detections. Samples were collected after a period of heavy rainfall during which time the groundwater elevations rose approximately five feet over three days. Additional samples were collected in January, under medium to high-flow conditions. Sample results from the January sampling event also had low-level total PCB detections. GM is reviewing additional evaluation steps (e.g., more drilling for a possible new trench alignment) and possible additional design alternatives. U.S. EPA and IDEM will continue to be updated as data become available.
- Planned restoration repairs north of Broomsage Road are currently scheduled to be completed in April 2012, weather permitting. The work was originally scheduled for November 2011 but has been delayed due to unfavorable weather.

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4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Continue to collect and treat Spring 018 water, and continue maintenance of erosion controls as needed.
 - Continue Spring 018 trench design evaluation.
 - Complete restoration repairs on properties north of Broomsage Road in 2012, when weather permits.
 - Complete restoration design for the two remaining properties west of Peerless Road that GM LLC is responsible for. Restoration design will be completed in cooperation with RACER Trust, who owns two of the other properties to the west. Completion of restoration for GM LLC obligations is anticipated to be completed during the 2012 construction season.
 - Hold annual technical review meeting with U.S. EPA and IDEM in April.
 - The next Public and Community Liaison Panel (CLP) meetings will be held in the late spring or early summer of 2012, after the remaining construction resumes.
 - A meeting will be held for local realtors to provide updates on the status of the creek cleanup and restoration. Timing has not yet been set for this meeting.

TABLE 1

SES TREATMENT SYSTEM #1 SAMPLING RESULTS - JANUARY/FEBRUARY 2012

GM CETC BEDFORD FACILITY

BEDFORD, INDIANA

Sample Date	Analysis	Influent	After Sand Filter 1	After Sand Filter 2	Between Carbons 1 & 3	Between Carbons 2 & 4	Effluent
1/5/2012	PCB (ug/L) Turbidity (NTU)	0.076 J 1.56	0.074 J 0.44	0.12 J 1.66	ND (0.20) 0.91	ND (0.19) / ND (0.19) 2.50 / 2.53	ND (0.19) 0.25
1/11/2012	PCB (ug/L) Turbidity (NTU)	0.10 J 2.71	 	 	 	ND (0.19) 1.00	ND (0.20) 0.04
1/17/2012	PCB (ug/L) Turbidity (NTU)	0.095 J 11.40		 	 	ND (0.20) / ND (0.20) 0.71 / 0.73	ND (0.19) 0.21
1/23/2012	PCB (ug/L) Turbidity (NTU)	0.094 J 7.65		 	 	ND (0.20) 0.73	ND (0.19) 0.01
1/31/2012	PCB (ug/L) Turbidity (NTU)	ND (0.19) 5.92		 	 	ND (0.19) / ND (0.19) 0.98 / 1.01	ND (0.19) 0.89
2/8/2012	PCB (ug/L) Turbidity (NTU)	ND (0.19) 2.82	ND (0.19) 1.79	ND (0.20) 1.65	ND (0.19) 1.19	ND (0.20) 0.68	ND (0.19) 0.25
2/16/2012	PCB (ug/L) Turbidity (NTU)	ND (0.19) 7.96		 		ND (0.19) / ND (0.19) 0.72 / 0.73	ND (0.19) 0.28
2/21/2012	PCB (ug/L) Turbidity (NTU)	ND (0.19) 3.07		 	 	ND (0.19) 0.33	ND (0.19) 0.07
2/28/2012	PCB (ug/L) Turbidity (NTU)	0.12 J 3.82	 	 	 	ND (0.19) 0.84	ND (0.19) 0.17

Note:

J - Estimated Value

ND - Non detect

"--" - Not Sampled

APPENDIX A

DELIVERABLES SUMMARY

APPENDIX A

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DELIVERABLES SUMMARY

Deliverable	Reference	Deadline	Deliverable Due Date	Status
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 U.S. EPA Approval Email, August 11, 2009	1 st 30 days AED 15 th of every other month thereafter	August 30, 2003 March 15, 2012	complete submitted March 14, 2012
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