

RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #17 SECOND QUARTER 2005

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

EPA ID# IND006036099

**Prepared For:
General Motors Corporation**

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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. This report covers the period of the second calendar quarter of 2005 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 CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) Removal Action Program, pursuant to the Administrative Order on Consent (AOC) between the 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 Third Quarter 2005, will be submitted on or before October 15, 2005.

2.0 LIST OF COMPLETED ACTIVITIES

The following documents were prepared and distributed during this quarter:

- Conference calls were held with the 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 April 5, 7, 14, 21, and 26, May 10, 16, and 24, and June 2 (on-Site), 9, 15, and 28, 2005 to discuss project progress (United States Fish and Wildlife Service (USFWS) was also invited to attend the update calls);
- The Cover System Grading Areas Narrative was submitted to the U.S. EPA and IDEM on April 4, 2005;
- The Proposed Removal Action Work Plan Modification for Sampling and Handling of Soil Materials with low-level PCBs (<50 mg/kg) was submitted to the U.S. EPA and IDEM on April 5, 2005;
- The Pre-Final (95%) Design for the East Plant Area Grading Areas was submitted to the U.S. EPA and IDEM on April 5, 2005;
- The Pre-Final (95%) Design for the Vault, that is to be constructed in the East Plant Area, was submitted to the U.S. EPA and IDEM on April 6, 2005;
- The 16th Quarterly Progress Report, covering January, February, and March 2005, was submitted to the U.S. EPA on April 14, 2005;
- The letter report RCRA Facility Investigation (RFI) East Plant Area PCB Sample Results with concentrations ≥ 50 mg/kg was submitted to the U.S. EPA and IDEM on April 19, 2005;
- A Qualitative Aerial Infrared Survey of Springs in Bedford, Indiana (EagleView Industries, March 20-21, 2004) was submitted to the U.S. EPA and IDEM on April 21, 2005. This survey was completed as part of RFI Work Plan: Addendum No. 5;
- The revised Pre-Final (95%) Design for the Cover System Grading Areas for the East Plant Area was submitted to the U.S. EPA and IDEM on April 25, 2005;
- The revised Pre-Final (95%) Design for the Vault, that is to be constructed in the East Plant Area, was submitted to the U.S. EPA and IDEM on April 25, 2005;
- The final Technical Memorandum RCRA Facility Investigation Soil; Sediment; Surface Water; Wipe Sampling was submitted to the U.S. EPA and IDEM on April 25, 2005;

- GM received a letter from the U.S. EPA, dated May 5, 2005, indicating that the U.S. EPA RCRA, TSCA, and CERCLA programs agree with the general overview of components and tasks based on the collective site-specific factors and information as presented in GM's March 9, 2005, correspondence regarding the Scope of Work for the East Plant Area;
- G GM received a letter from the U.S. EPA, dated May 6, 2005, indicating that the U.S. EPA RCRA, TSCA, and CERCLA programs approve the use of the <50 ppm PCB impacted Removal Action soils placed to provide excavation backfill and grading support for the East Plant Area Low Permeability Cover System as presented in GM's March 9, 2005, correspondence regarding the Scope of Work for the East Plant Area. The letter requires that GM initiate the negotiation of a U.S. EPA RCRA Consent Order for financial assurance and land-use restrictions for the implementation and operation and maintenance of the East Plant Area Interim Measures within ninety days of the date of this letter;
- Geophysical Survey Information for Area of Interest (AOI) 7, which was collected as part of RFI Work Plan: Addendum No. 9, was submitted to the U.S. EPA and IDEM on May 10, 2005;
- An amended Pre-Final (95%) Design for Grading Areas 1 and 2 for the East Plant Area was submitted for review to the U.S. EPA and IDEM on May 10, 2005;
- A Rule 5 Erosion and Sediment Control Plan for potential borrow source areas on Parcel 39 was submitted to Indiana Department of Natural Resources (IDNR) on May 20, 2005;
- Responses to U.S. EPA and IDEM comments regarding the Pre-Final (95%) Design for Grading Areas 1 and 2 of the East Plant Area were submitted to the U.S. EPA and IDEM on May 25, 2005;
- Fact Sheet 11 was issued on May 25, 2005;
- The U.S. EPA public comment period for proposed remedy for the East Plant Area began May 31, 2005, and ends July 14, 2005. A notice, announcing this public comment period, appeared in the Bedford Times Mail (newspaper) May 31, 2005. The document outlining the proposal, the Interim Measures Alternative Review Report: East Plant Area is available on-line and at the public repositories. This document was submitted to the U.S. EPA and IDEM on May 27, 2005;
- The U.S. EPA issued a Statement of Basis for the proposed East Plant Area remedy. The document was mailed to the project mailing list, posted to the Website, and placed in the public repositories;

- The Final (100%) Design for Grading Areas 1 and 2 of the East Plant Area was submitted to the U.S. EPA and IDEM on June 10, 2005;
- Responses to the U.S. EPA (May 18, 2005) comments regarding the letter report on PCB sample results and delineation of ≥ 50 mg/kg, PCB material in the East Plant Area were submitted to the U.S. EPA and IDEM June 10, 2005;
- Final unvalidated results of the ten additional delineation borings advanced in the East Plant Area were sent to the U.S. EPA and IDEM on June 15, 2005;
- The second revision to the Pre-Final (95%) Design for the Vault, that is to be constructed in the East Plant Area, was submitted to the U.S. EPA and IDEM (revisions based on comments from U.S. EPA and IDEM) on June 16, 2005;
- The draft Site Source Control Work Plan Addendum No. 4 for the Removal Action and an accompanying draft Seep and Spring Data Package were submitted to the U.S. EPA on June 22, 2005;
- The draft RCRA Facility Investigation Work Plan Addendum No. 10, proposing investigative work within the South Piston Yard, former underground storage tank area, was submitted to the U.S. EPA on June 22, 2005;
- The draft RCRA Facility Investigation Work Plan Addendum No. 11, proposing an additional dye trace test, and injection well and monitoring well installations was submitted to the U.S. EPA on June 24, 2005;
- The East Plant Area Grading Areas 1 and 2 were verbally approved for use during the June 2, 2005 conference call/meeting by the U.S. EPA;
- The construction of Grading Area 1 was completed on June 13, 2005. The construction of Grading Area 2 was completed on June 28, 2005;
- Placement of the < 50 mg/kg soil from the Removal Action into Grading Areas 1 commenced on June 15, 2005. By the end of June 2005, approximately 29,000 tons of soil had been placed into Grading Area 1;
- The new Wastewater Treatment Plant for water from the stormwater pond was available to operate at 2,000 gallons per minute (gpm) on an emergency basis on April 30, 2005. The final construction of the entire treatment system and building enclosures, including the additional 300 gpm system designed to treat the Site source control water/groundwater, is expected to be completed in late September/early October 2005. A successful performance (shakedown) test on the 2,000 gpm treatment system, including analytical sampling, was conducted on May 19, 2005. Water from the remediation activities is still being sent to one of the temporary treatment systems set up in the Removal Action until final components

for the 300 gpm system are received to complete that portion of the new treatment plant;

- Observations on the ongoing Dye Tracing Test (RFI Work Plan: Addendum No. 8) in the East Plant Area continued with fluorescein continuing to show in only one location (SSC System F) to date; and
- Two rounds of sampling occurred for the Site Source Control monitoring of the springs and seeps under the Phase I and Phase II sampling network. High-flow conditions were met for the first time this year in June 2005. Samples were collected on June 14, 16, 17, 20, and 21, 2005. Low-flow conditions for the second quarter of 2005 were met during May. Samples for this event were collected on May 11, 12, 13, 16, 17, 18, and 20, 2005.

GM continued to implement field activities described in the draft RFI Work Plan Addendum No. 9, regarding additional investigative in the East Plant Area during this reporting period. Also, GM began the initial phase of groundwater resampling activities at locations along the unnamed tributary from GM's Outfall #002 and along the east side of GM property, as per the U.S. EPA's request.

GM also continued to evaluate specific sampling requests made by residents in this quarter and collected samples, where appropriate, based on knowledge and location of the property relative to the plant and/or contamination. These analytical results (once validated) have been included in the stream project data packages distributed to the residents, and to U.S. EPA and IDEM. GM will continue evaluating additional areas requested by residents, and sampling, as appropriate, on a case-by-case basis, during the next reporting period

The March 2005, April 2005, and May 2005 CERCLA Removal Action Monthly Progress Reports were submitted during the 2nd quarter of 2005.

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:

- Quarterly Progress Report #16: First Quarter 2005;
- RCRA Facility Investigation (RFI) East Plant Area PCB Sample Results with concentrations ≥ 50 mg/kg;
- A Qualitative Aerial Infrared Survey of Springs in Bedford, Indiana (EagleView Industries,);
- Final Technical Memorandum RCRA Facility Investigation Soil; Sediment; Surface Water; Wipe Sampling;
- Geophysical Survey Information for Area of Interest (AOI) 7;
- Pre-Final (95%) Design for Grading Areas 1 and 2;
- Fact Sheet 11;
- Interim Measures Alternative Review Report: East Plant Area;
- Final (100%) Design for Grading Areas 1 and 2;
- Pre-Final (95%) Design for the Vault;
- Draft Site Source Control Work Plan Addendum No. 4 and the draft Site Source Control Memorandum – Seep and Spring Data Package;
- Draft RFI Work Plan Addendum No. 10; and
- Draft RFI Work Plan Addendum No. 11.

4.0 COMMUNITY RELATIONS

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

Quarterly meetings to review project status, both with the neighbors along the creek and around the plant, as well as with the general public, were held for this quarter on June 1 and 2, 2005, at the Facility. The next meetings are scheduled to occur in September 2005. They will be a hybrid of the traditional presentation format and the availability session format. Presentations for the meetings are posted on the web site at www.BedfordPowertrainCorrectiveAction.com.

Fact Sheet 11 was issued on May 25, 2005. The next Fact Sheet will be issued in September 2005. Two meetings were also held with residents along Broomsage Road to discuss the truck traffic. Another meeting was held with the congregation of a church interested in the potential purchase of Parcel 2.

A CLP meeting occurred in this quarter on June 3, 2005. The next regularly scheduled meeting with the Community Liaison Panel (CLP) is expected to be scheduled for September 2005. The CLP was formed to provide additional communication avenues for the community and the meetings had been held at the GM plant approximately every three months. The CLP meeting minutes are posted on the GM website at www.BedfordPowertrainCorrectiveAction.com.

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

There were not personnel changes during this reporting period

6.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

Work projected for the next reporting period includes:

- Conduct a neighborhood meeting in September 2005;
- Conduct a general public information session in September 2005;
- Conduct a Community Liaison Panel Meeting in September 2005;
- Prepare and distribute Fact Sheet 12 in September 2005;
- Continue with Removal Action activities in the upstream and downstream parcels;
- Continue monthly monitoring of groundwater elevations measurements;
- Continue the evaluation of RFI soil and groundwater data;
- Prepare an IM Work Plan for the Plant property areas west of GM Drive;
- Submit response to comments for the RFI Work Plan: Addendum No. 6;
- Submit a modified IM Work Plan for the Northern Tributary to the U.S. EPA for review;
- Submit the Ecological Risk Assessment to the U.S. EPA for review;
- Continue work outlined in RFI Work Plan: Addendum No. 8 for the additional dye trace studies in the AOI 4 and AOI 6 areas in support of the East Plant Area IM;
- Submit the Final RFI Work Plan: Addendum No. 9 for additional geological investigations. These investigations will be completed during the next quarter to support the IM in the East Plant Area;
- Continue sampling groundwater monitoring wells along the east side of GM property, as per the U.S. EPA request;
- Initiate RFI Work Plan: Addendum No. 10 regarding soil boring installation and document review for five former underground storage tanks (USTs) in the South Piston Yard;
- Initiate RFI Work Plan: Addendum No. 11 regarding a dye trace study in AOI 9;
- Spring and seep sampling as part of the Site Source Control Work Plan will continue during the next quarter. The 2nd quarter high flow and both 3rd quarter low and high flow sampling will be attempted when the criteria are met;
- Complete the design for the East Plant Area Interim Measure and submit for U.S. EPA review;
- Continue to work with the U.S. EPA and IDEM to gain approval of the East Plant Area Vault design. Upon receipt of approval, potential contractor bids will be

evaluated and the construction award. Construction of the vault liner will begin as soon as possible;

- Submit to the U.S. EPA and IDEM the detailed design for the excavation of the ≥ 50 mg/kg PCB material in the East Plant Area. Work with the U.S. EPA and IDEM to gain approval. Upon receipt of approval, potential contractor bids will be evaluated and the construction award. Excavation of the ≥ 50 mg/kg PCB material from the East Plant Area will commence as soon as the construction of the vault is complete;
- Submit to the U.S. EPA and IDEM the cover system design for the East Plant Area. Work with the U.S. EPA and IDEM to gain approval; and
- Continuation of placement of the < 50 mg/kg Removal Action soils in the East Plant Area both as grading fill and as fill in excavations.

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

Packages of analytical data from any sampling activity have been submitted as they become available, after validation, under separate cover, and will continue to be submitted during the next reporting period.