



**CONESTOGA-ROVERS  
& ASSOCIATES**

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May 10, 2005

Reference No. 13968

Mr. Brad Stimple  
On-Scene Coordinator  
U.S. EPA Region 5 - Cleveland Office  
25089 Center Ridge Road  
Westlake, OH  
44145

Dear Mr. Stimple:

Re: Revised Parcel 22 / Downstream Parcels Removal Action Work Plans: Addendum No. 1  
Administrative Order on Consent for Removal Action  
Docket No. V-W-03-C-747  
GM Powertrain - Bedford Facility  
Bedford, Indiana

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Consistent with the submittal requirements of Section VIII, Paragraph 39a of the Administrative Order on Consent (AOC), effective July 31, 2003, and pursuant to Section 3.7: Soil Excavation, Handling and Backfilling and Section 3.8: Creek Sediment Removal and Handling in the Parcel 22 / Downstream Parcels Removal Action Work Plans (CRA, July 2003 and May 2004, respectively), we are providing the following supplemental information regarding the soil sampling and handling procedures for the < 50 mg/kg PCB Removal Action (RA) material.

Should you have any questions regarding this document, please do not hesitate to contact me at (812) 279-0977 or Ms. Cheryl Hiatt at (248) 753-5799.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

James J. McGuigan, P.E.

PG/cnb/47  
Encl.

c.c.: see Distribution List



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**Distribution List**

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**PARCEL 22 / DOWNSTREAM PARCELS REMOVAL ACTION WORK PLAN:  
ADDENDUM NO. 1**

**SOIL SAMPLING AND HANDLING PROCEDURES FOR < 50 MG/KG PCB SOIL  
FOR RE-USE DURING EAST PLANT AREA INTERIM MEASURE**

The purpose of this Parcel 22 / Downstream Parcels Removal Action Work Plan: Addendum No. 1 is to present modified material stockpile sampling methods and handling procedures for the < 50 mg/kg PCB Removal Action (RA) material, which will be used as backfill and grading fill as part of the East Plant Area Interim Measure (IM) in accordance with the U.S. EPA approved IM design. The proposed sampling and handling procedures are as follows:

- Composite stockpile samples will be collected for each approximate 500 tons of material.
- U.S. EPA has identified the following sampling frequencies for each approximate 500 tons of material before it can be moved to the East Plant Area based on the initial PCB delineation concentration ranges:

<b>PCB Delineation Concentration Range (mg/kg)</b>	<b>Number of Composite Samples Per Approximately 500 tons of Material</b>
5 to 10	1
10 to 25	2
25 to 50	3

It should be noted that the number of samples will be pro-rated for smaller / larger material volumes depending upon construction activities. In circumstances, where a stockpile is comprised of materials from more than one concentration range, the number of samples will be consistent with the requirement for the highest PCB concentration range.

It is estimated that there will be up to 25 individual truck loads for every approximate 500 ton pile. One grab sample (individually numbered) will be collected from each truck load as it is added to the material stockpiles.

Composite samples will be made in the frequencies identified above by homogenizing the soils from individual grab samples, with a maximum of nine individual grab samples used to make any composite sample. For example, if there are 25 truck loads with an estimated concentration range of 10 to 25 mg/kg, 18 individual samples will be randomly selected from the 25 taken. The 18 samples will be split into two groups of nine to make two composite samples.



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- Once the staged material stockpile characterization analytical results have confirmed that the material is < 50 mg/kg PCB, that material will be transported to the East Plant Area for direct placement or, if direct placement is not possible, to a location approved by the U.S. EPA for temporary staging prior to the use of the material as backfill and grading material;
- If any of the stockpile material characterization samples indicate a concentration equal to or greater than 50 mg/kg total PCBs, then the material stockpile will be disposed of as material containing a concentration of PCBs equal or greater than 50 mg/kg (i.e., off-Site disposal as per the approved Work Plans); and
- If there is any visually observed change in material composition identified at the time of excavation, the material will be segregated and sampled separately in accordance with the procedures outlined above.

The proposed approach presented above is consistent with the past PCB delineation and material stockpile sample characterization results developed to date. Additional revisions to this approach may be proposed to U.S. EPA in the future as additional information and site conditions warrant.