2010 UPSTREAM PARCELS MONITORING REPORT

BAILEY'S BRANCH AND PLEASANT RUN REMOVAL ACTION BEDFORD, INDIANA

Prepared For: General Motors LLC

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Agreement Performance-Based Corrective Action Agreement

AOC Administrative Order on Consent

Bailey's Branch Creek Bailey's Branch Creek at the upstream end of Pleasant Run Watershed

CA Corrective Action

CERCLA Comprehensive Environmental Response, Compensation and

Liability Act

CETC Castings Engines Transmissions and Components (formerly

Powertrain)

CRA Conestoga-Rovers & Associates Inc.

Facility GM CETC Bedford Facility

GM General Motors LLC
GPS global positioning system

IDNR Indiana Department of Natural Resources

IOMMP Upstream Parcels Interim Operation, Maintenance,

and Monitoring Plan

MLC Motors Liquidation Corporation N AOI4 Area North of Area of Interest 4

RA Removal Action

Report 2010 Upstream Parcels Monitoring Report RCRA Resource Conservation and Recovery Act

TSCA Toxic Substances Control Act

Upstream Parcels Parcels 3, 4, 6, 205, 215, 216 (west of Bailey Scales Road), 401, and the

i

area north of Area of Interest 4

U.S. EPA United States Environmental Protection Agency

1.0 INTRODUCTION

Conestoga-Rovers and Associates, Inc. (CRA), on behalf of General Motors LLC (GM), has prepared this 2010 Upstream Parcels Monitoring Report (Report) documenting the findings of the 2010 Fall Inspection of the restored channel of Bailey's Branch Creek and adjacent riparian areas within the privately owned and GM owned Upstream Parcels located near the GM Castings Engines Transmissions and Components (CETC) (formerly Powertrain) Bedford Facility (Facility) located in Bedford, Indiana. This Report has been prepared in accordance with the Administrative Order on Consent (AOC, United States Environmental Protection Agency [U.S. EPA] Docket No.: V-W-'03-C-747), effective July 31, 2003, for the Removal Action (RA) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), consistent with the requirements of the Toxic Substances Control Act (TSCA), and consistent with the Resource Conservation and Recovery Act (RCRA) Corrective Action (CA) work conducted under the Performance Based Agreement executed on March 20, 2001, and modified on October 1, 2002, March 29, 2007, and May 9, 2008, for the Facility.

As U.S. EPA is aware, the former General Motors Corporation filed for bankruptcy protection in June of 2009. The former General Motors Corporation is now known as Motors Liquidation Company (MLC). On July 10, 2010, MLC sold a portion of its assets in Bedford, Indiana, including the Bedford Facility and Parcel 3, to General Motors, LLC. At the time the Upstream Parcels Interim Operation, Maintenance, and Monitoring Plan (IOMMP) was developed (CRA, June 13, 2008), the Upstream Parcels consisted of Parcels 3, 4, 5, 6, 8, 10, 11, 12, 205, 215, 216 (west of Bailey Scales Road), 401, and the area north of Area of Interest 4 (N AOI 4). Several of these properties related to the Upstream Parcels were not included in the asset sale and are currently retained by MLC, including Parcels 5, 8, 10, 11, and 12. Those properties owned by MLC will be monitored by MLC, as described in the Master Sales and Purchase Agreement, effective July 10, 2009. The remainder of the Upstream Parcels (3, 4, 6, 205, 215, 216, 401, and N AOI 4), hereinafter collectively referred to as the "Upstream Parcels" are either privately owned or GM LLC owned and have been included in the Fall 2010 Inspection. The location of the Upstream Parcels is presented on Figure 1.1. Portions of Parcels 205, 215, 216, and N AOI 4 are currently under construction as part of the East Plant Area remedy; monitoring activities for these Parcels will be incorporated with the East Plant Area Cover System monitoring requirements.

The 2010 Fall Inspection was completed the week of September 27, 2010.

2.0 BACKGROUND

The RA for the Upstream Parcels included removal of impacted soil, rock, and sediment from the creek area for off-Site disposal and restoration of the creek and adjacent habitats in the affected areas. The creek channel, riparian corridor, and floodplain were restored to similar form using clean soil and aggregate materials. Restoration of the creek channel also included the construction of instream features such as pool-riffle sequences and bank stabilization structures. The riparian corridor and floodplain were returned to similar condition and vegetated with a variety of native seed mixes, shrubs and trees (combination of seedlings and specimens with diameters of 1 inch or greater). Habitat features, such as deadfalls and vernal ponds were installed within the riparian corridor. Table 2.1 presents a summary of vegetation installed by parcel, including the specific seed mixes applied.

3.0 RESTORATION MONITORING

The following sections outline monitoring activities undertaken in the Fall 2010 Inspection, which included field reconnaissance to assess creek channel stability, extent and nature of vegetative cover, and status of the habitat features. A photographic log, including the location of the photographs using a hand held global positioning system (GPS), was implemented to document conditions along the stream channel. The vegetative assessment was completed and documented using the monitoring form provided in the Upstream Parcels IOMMP (CRA, June 13, 2008).

The photographic log and location map for the Fall 2010 Inspection are provided in Appendix A. The vegetation assessment monitoring forms for the Fall 2010 Inspection are provided in Appendix B.

3.1 CREEK STABILIZATION

A continuous photographic log was completed along the stream channel to document the stability of the stream channel. The presence or lack of pool-riffle sequences and waterfalls were also assessed. It should be noted that natural processes are expected to modify the creek through time, and the weirs (i.e., rock current deflectors installed to create pool-riffle sequences) placed during restoration are expected to be altered and/or moved during the natural stream flow processes.

In general, the creek channel has not moved or shifted significantly since the restoration activities were completed.

A number of rock current deflectors were installed to promote the formation of pool-riffle sequences within the channel. The rock current deflectors have performed as expected, remain largely intact, and are documented within the photo log in Appendix A (see Appendix A Figure 6, 7 and 9).

The banks along the length of the creek channel do not show visible signs of erosion, undercutting or failure. The bank stabilization features (i.e., log deflectors, limestone roughback deflectors) remain intact, showing no visible signs of failure.

3.2 VEGETATIVE COVERAGE

Areas adjacent to the restored creek channel (riparian zone) were re-vegetated by applying diverse seed mixes of native grasses and forbs and planting native shrubs and trees to promote succession to re-establish native habitats. The selected planting scheme for each parcel was based on its proposed land use (e.g., residential or natural riparian corridor) and environmental conditions (e.g., upland forest versus wet meadow area). Due to the relatively small width of the restored riparian zones for the Upstream Parcels, ground truthing during the monitoring events encompassed the entire riparian area restored on each parcel.

For grasses and forbs, the relative abundance of each species observed on each parcel was assigned a value between 1 and 6 based on the abundance categories of Simon et al. (2001). Species abundance categories for grasses and forbs are presented in Table 3.1. Each species observed was noted as either included in the specified seed mix or as a volunteer. Species identified by Indiana Department of Natural Resources (IDNR) as invasive to Southern Indiana were noted (Nice, 2006). The percent aerial cover of grasses and forbs within each cover type was estimated by visual inspection and recorded on the monitoring form.

For shrubs and trees, monitoring consisted of identifying species present and evaluating survival of seedlings and larger specimens planted in the Upstream Parcels. Survival of shrubs and trees were assigned to one of four survival classes, as defined in Table 3.2. In addition to noting the survival of the specimens planted, shrubs and trees that have colonized each parcel (volunteers), including invasive species, were identified and noted.

Vegetative cover was documented for Parcels 3, 4, 6, portions of 205, and 401. Activities for the RA are ongoing for the other Upstream Parcels (portions of 205, 215, 216, and N AOI 4) and monitoring of these parcels will be including in the monitoring requirements for the East Plant Area Cover System. Activities associated with the RA are also ongoing in the southern portion of Parcel 401. The percent aerial coverage of vegetation on the steep banks on the north side of the drainage channel on Parcel 401 is approximately 60 percent. Trees and shrubs were planted on Parcel 401, and are currently present.

Parcel 4 is privately owned. The area restored on Parcel 4 was planted with a lawn seed mix and has been regularly mowed since completion of restoration. Access to Parcel 4 is limited by the presence of a fence at both the upstream and downstream ends of the parcel. Based on observations from the fence lines, vegetative cover on Parcel 4 is

predominantly maintained lawn with an aerial coverage of greater than 90 percent. Survival of the trees planted is greater than 75 percent.

For Parcel 205, interim measures conducted in 2010 required removal of the vegetation that was documented in the last monitoring report. Following completion of those activities, Parcel 205 was re-seeded with a mix of grasses typically used to stabilize landfill covers. The percent areal cover on Parcel 205 is approximately 85 percent and consists of grasses in the seed mix, as well as several species of volunteer grasses and forbs. Trees and shrubs were not planted on Parcel 205. Several species of trees are present through natural colonization.

3.3 <u>HABITAT FEATURES</u>

Habitat features observed during the 2010 Fall Inspection showed no signs of movement or significant damage. Many of these features (e.g., logs placed on ground) are naturally degrading over time, which is expected and was intended in the restoration planning. The vernal ponds created in the Upstream Parcels are heavily vegetated and there are no visible signs of erosion.

4.0 RESTORATION MAINTENANCE

No maintenance activities are recommended at this time.

5.0 <u>REFERENCES</u>

- Conestoga-Rovers & Associates, Inc., Upstream Parcels Interim Operations, Maintenance, and Monitoring Plan, June 13, 2008.
- Nice, G. 2006. Noxious and invasion weeds and weed laws in Indiana. Purdue Extension Weed Science. Revised 12/06.
- Simon, T.P., Stewart, P.M., and Rothrock, P.E., 2001. Development of multimetric indices of biotic integrity of riverine and palustrine wetland plant communities along Southern Lake Michigan. Aquatic Ecosystem Health and Management 4: 293-309.

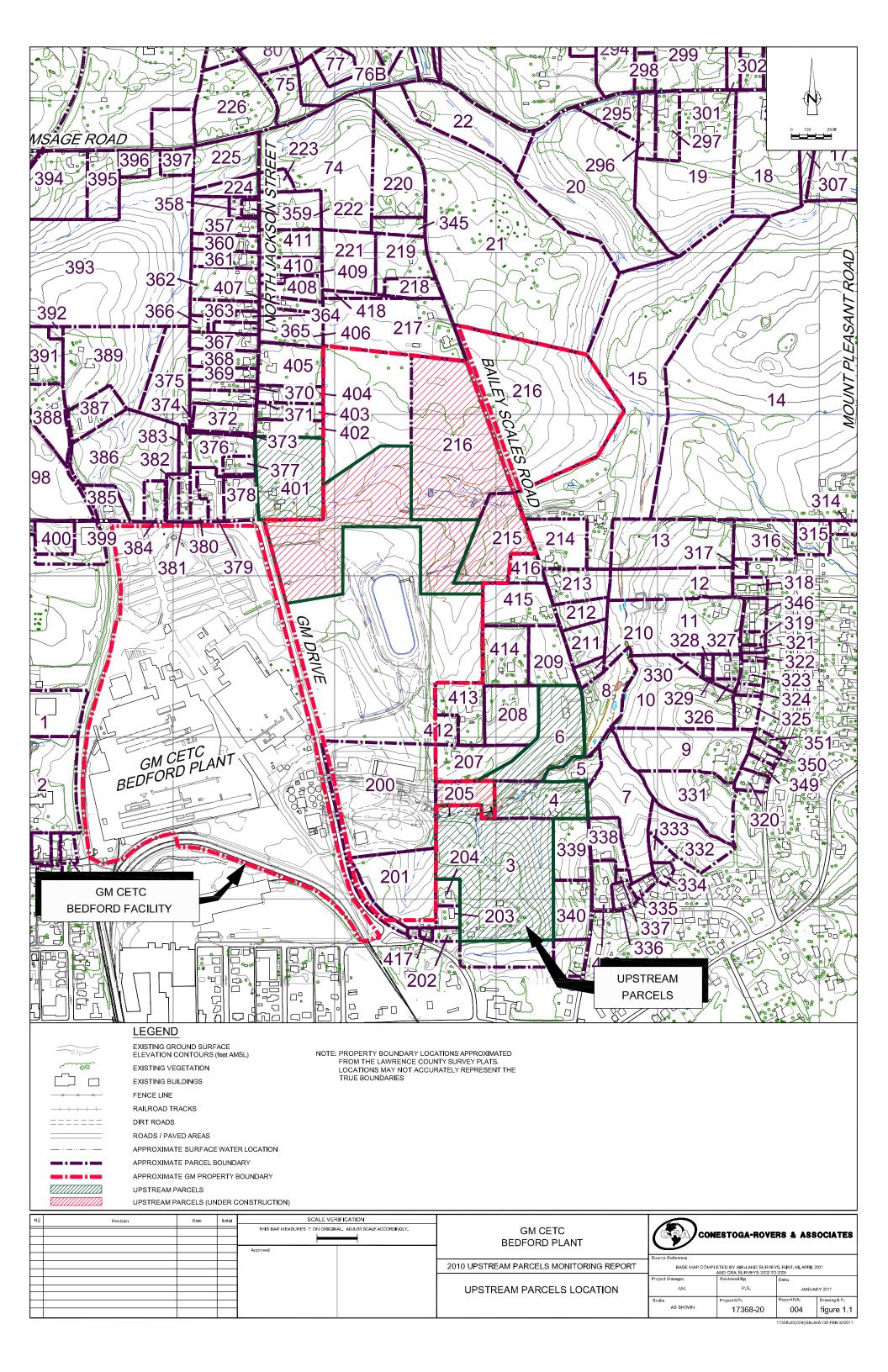


TABLE 2.1

TREE/VEGETATION SUMMARY 2010 UPSTREAM PARCELS MONITORING REPORT GM CETC BEDFORD FACILITY BEDFORD, INDIANA

Upstream Parcels	Number of trees/seedlings installed	Number of shrubs installed	Other
			grass/wildflower seed mix
3	-	-	and slope forest seed mix
			slope forest seed mix and
4	173	20	riparian forest seed mix
			slope forest seed mix and
6	8	-	riparian forest seed mix
			grass/wildflower seed mix
205	-	-	and slope forest seed mix
216 (West of Bailey Scales Road)	-	-	lawn seed
401	6	33	lawn seed
Area North of AOI 4	-	-	lawn seed

TABLE 3.1

SPECIES ABUNDANCE CATEGORIES FOR GRASSES AND FORBS 2010 UPSTREAM PARCELS MONITORING REPORT GM CETC BEDFORD FACILITY BEDFORD, INDIANA

Abundance Rating	Abundance Category	Description
1	Observed	1 individual of a species present
2	Rare	2-4 individuals of a species present
3	Rare/Common	>4 individuals of a species, but not enough to be categorized as "common"
4	Common	Species is easily located
5	Very Common	Species is slightly dominant; up to 25% of the plant community
6	Abundant	Species accounts for 25-100% of the plant community

Source: Simon et al., 2001

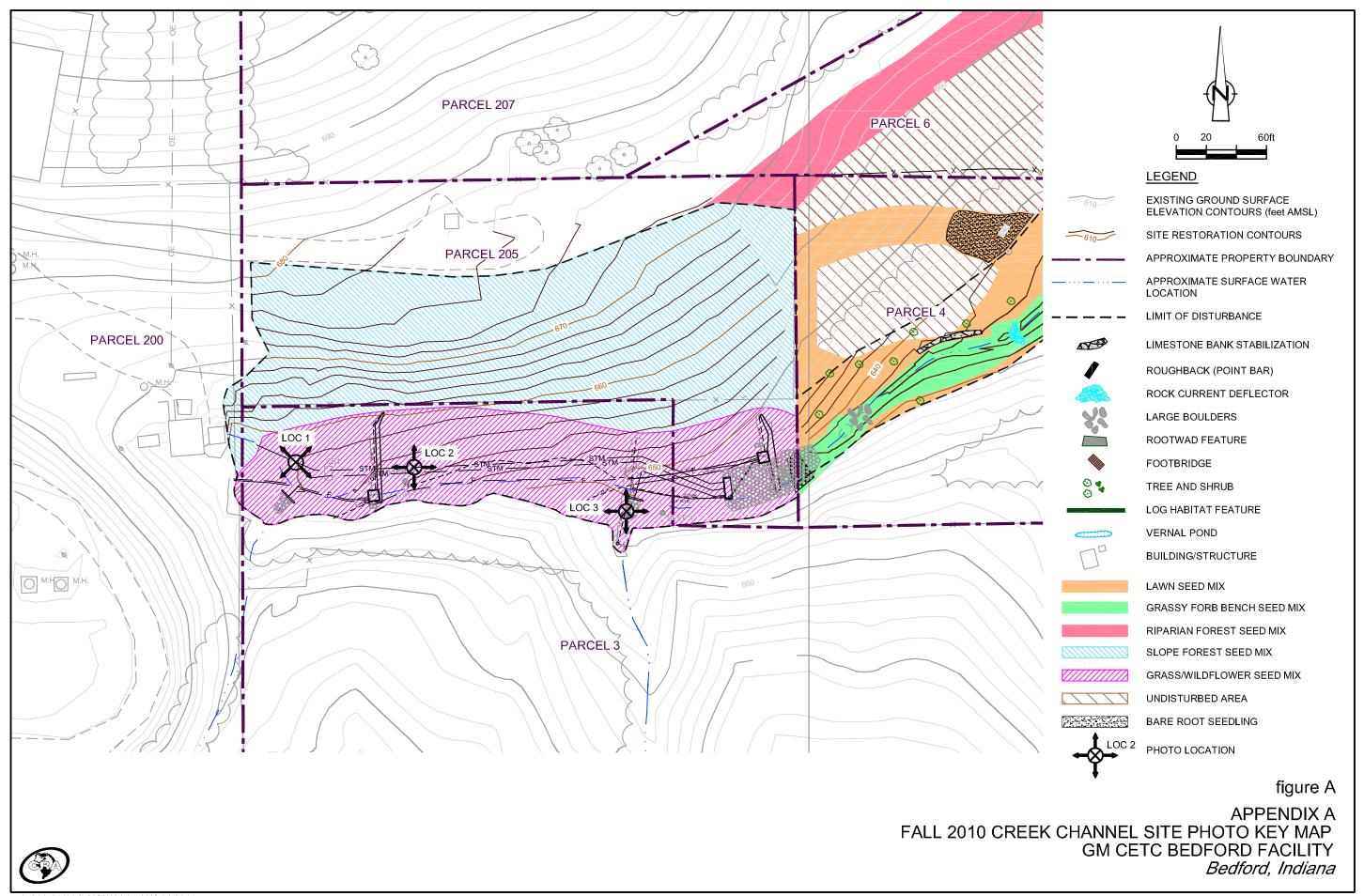
TABLE 3.2

SURVIVAL CLASSES FOR TREES AND SHRUBS 2010 UPSTREAM PARCELS MONITORING REPORT GM CETC BEDFORD FACILITY BEDFORD, INDIANA

Survival Class	Range of Percent Survival
1	0 – 25%
2	26 - 50%
3	51 - 75%
4	76 – 100%

APPENDIX A

FALL 2010 CREEK CHANNEL PHOTOGRAPHIC LOG



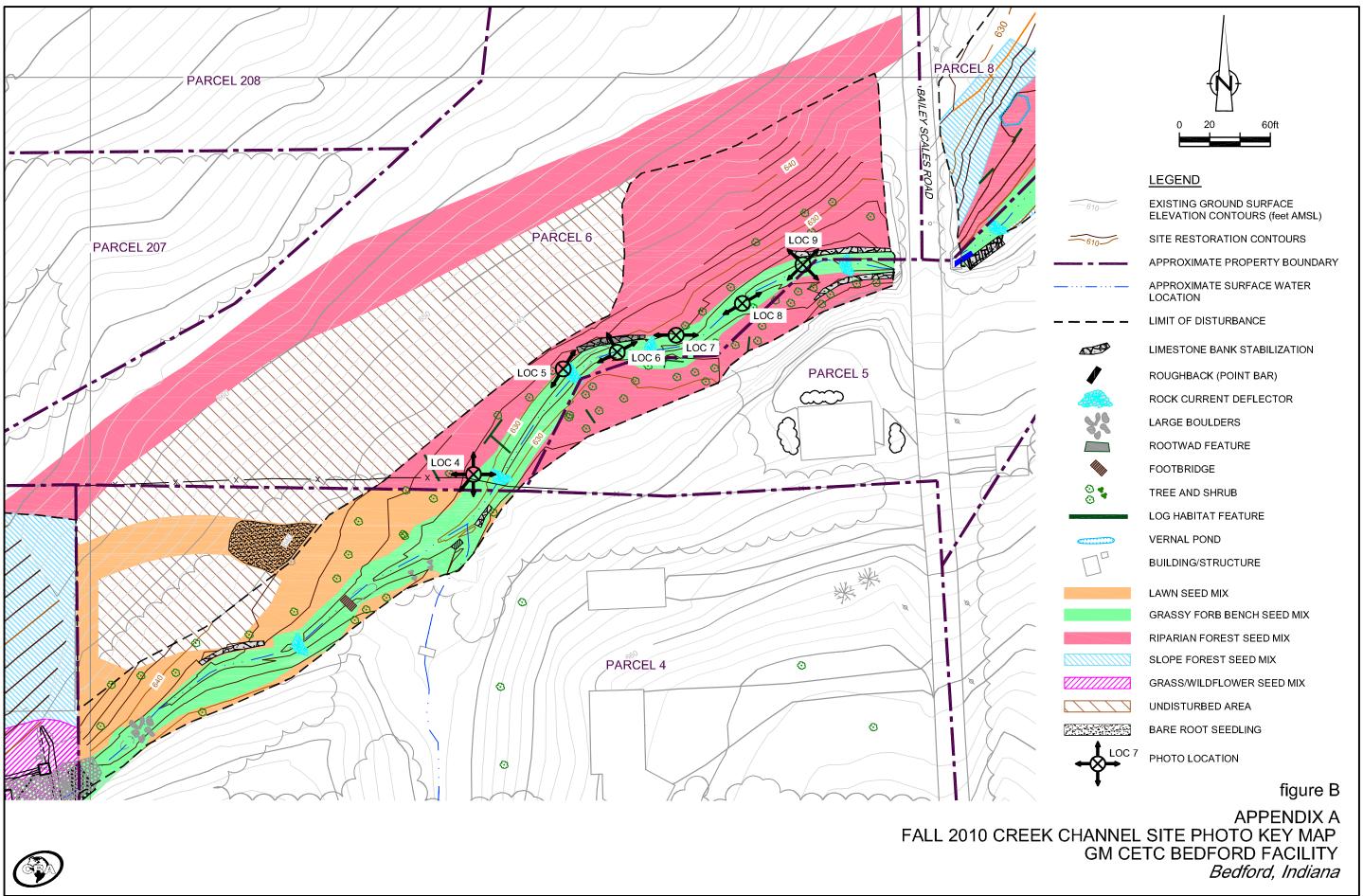




FIGURE 1.0 - PARCEL 3, LOCATION 1, LOOKING UPSTREAM (WEST)



FIGURE 1.1 - PARCEL 3, LOCATION 1, LOOKING DOWNSTREAM (EAST)





FIGURE 1.2 - PARCEL 3, LOCATION 1, LOOKING SOUTH, TRIBUTARY FROM PARCEL 201



FIGURE 1.3 - PARCEL 3, LOCATION 1, LOOKING NORTH, RIGHT BANK





FIGURE 2.0 - PARCEL 3, LOCATION 2, LOOKING UPSTREAM (WEST)



FIGURE 2.1 - PARCEL 3, LOCATION 2, LOOKING DOWNSTREAM (EAST)





FIGURE 2.2 - PARCEL 3, LOCATION 2, LEFT BANK



FIGURE 2.3 - PARCEL 3, LOCATION 2, RIGHT BANK







FIGURE 3.0 - PARCEL 3, LOCATION 3, LOOKING UPSTREAM (WEST)



FIGURE 3.1 - PARCEL 3, LOCATION 3, LOOKING EAST





FIGURE 3.2 - PARCEL 3, LOCATION 3, LOOKING SOUTH, LEFT BANK TRIBUTARY INLET



FIGURE 3.3 - PARCEL 3, LOCATION 3, LOOKING NORTH-WEST





FIGURE 3.4 - PARCEL 3, LOCATION 3, SOUTH POND OUTLET







FIGURE 4.0 - PARCEL 4, LOCATION 4, LOOKING UPSTREAM (WEST)



FIGURE 4.1 - PARCEL 6, LOCATION 4, LOOKING DOWNSTREAM (EAST)







APPENDIX A

FIGURE 4.3 - PARCEL 4, LOCATION 4, SOUTH BANK.







FIGURE 5.0 - PARCEL 6, LOCATION 5, LOOKING UPSTREAM (SOUTHWEST)



FIGURE 5.1 - PARCEL 6, LOCATION 5, LOOKING DOWNSTREAM (NORTHEAST)





FIGURE 6.0 - PARCEL 6, LOCATION 6, LOOKING UPSTREAM, ROCK CURRENT DEFLECTOR



FIGURE 6.1 - PARCEL 6, LOCATION 6, LOOKING DOWNSTREAM





FIGURE 6.2 - PARCEL 6, LOCATION 6, LOOKING DOWNSTREAM ROUGHBACK WALL (STABLE - NO MOVEMENT)



FIGURE 6.3 - PARCEL 6, LOCATION 6, CREEK SUBSTRATE





FIGURE 6.4 - PARCEL 6, LOCATION 6, POOL





FIGURE 7.0 - PARCEL 6, LOCATION 7, LOOKING UPSTREAM (ROCK WEIR)



FIGURE 7.1 - PARCEL 6, LOCATION 7, LOOKING DOWNSTREAM





FIGURE 7.2 - PARCEL 6, LOCATION 7, SOUTH BANK



FIGURE 7.3 - PARCEL 6, LOCATION 7, NORTH BANK





FIGURE 7.4 - PARCEL 6, LOCATION 7, LOG DEFLECTOR



FIGURE 7.5 - PARCEL 6, LOCATION 7, SUBSTRATE IS GONE, BEDROCK, NO SIGNIFICANT BANK EROSION





FIGURE 8.0 - PARCEL 6, LOCATION 8, LOOKING UPSTREAM



FIGURE 8.1 - PARCEL 6, LOCATION 8, LOOKING DOWNSTREAM





FIGURE 8.2 - PARCEL 6, LOCATION 8, SOUTH BANK



FIGURE 8.3 - PARCEL 6, LOCATION 8, NORTH BANK





FIGURE 9.0 - PARCEL 6, LOCATION 9, LOOKING UPSTREAM



FIGURE 9.1 - PARCEL 6, LOCATION 9, LOOKING DOWNSTREAM





FIGURE 9.2 - PARCEL 6, LOCATION 9, SOUTH BANK



FIGURE 9.3 - PARCEL 6, LOCATION 9, NORTH BANK





FIGURE 9.4 - PARCEL 6, LOCATION 9, LOOKING UPSTREAM





APPENDIX B

FALL 2010 VEGETATIVE ASSESSMENT FIELD FORMS

Inspectors
S. Jones/P. Farquharson

Date
September 28, 2010

Parcels/Cover Type
Parcel 6/Riparian Forest

I. GRASSES AND FORBS

Common Name	Scientific Name	Abundance		Seeded		Volunteer		Invasive	
		Rating	Category	Yes	No	Yes	No	Yes	No
Redtop	Agrostis sp.	4	Common	X			X		X
Big Bluestem	Andropogon gerardii	3	Rare/Common	X			X		X
Orchardgrass	Dactylus glomerata	2	Rare		X	X			X
Switchgrass	Panicum virgatum	3	Rare/Common	X			X		X
Canada Wild Rye	Elymus canadensis	3	Rare/Common	X			X		X
White Snakeroot	Eupatorium rugosum	2	Rare		X	X			X
Swamp Beggarstick	Bidens connata	3	Rare/Common	X			X		X
Rough Bugleweed	Lycopus asper	2	Rare		X	X			X
Crownvetch	Coronilla varia	3	Rare/Common		X	X		X	
Sunflower	Helianthus sp.	2	Rare		X	X			X
Thoroughwart	Eupatorium serotinum	2	Rare		X	X			X
Japanese Honeysuckl	Lonicera japonica	3	Rare/Common		X	X		X	

I. GRASSES AND FORBS (continued)

Common Name	Scientific Name	Abundance		Seeded		Volunteer		Invasive	
		Rating	Category	Yes	No	Yes	No	Yes	No
Swamp Smartweed	Polygonum coccineum	3	Rare/Common		X	X			X
Small White Aster	Symphyotrichum racemosum	4	Common		X	X			X
Milkweed	Asclepias sp.	2	Rare	X			X		X
Prairie Aster	Aster trubinellus	3	Rare/Common		X	X			X
Sedge	Carex sp.	2	Rare		X	X			X
Queen Anne's Lace	Daucus carota	4	Common		X	X			X
Teasel	Dipsacus sylvestris	2	Rare		X	X			X
Purple Coneflower	Echinacea purpurea	3	Rare/Common	X			X		X
Spearmint	Mentha spicata	2	Rare		X	X			X
Narrowleaf Goldenro	Solidago graminifolia	2	Rare		X	X			X
Prairie Coneflower	Ratibida pinnata	3	Rare/Common		X	X			X
Compass Plant	Silphium laciniatum	1	Observed	X			X		X
Prairie Dock	Silphium terebinthinaceum	2	Rare	X			X		X
Broadleaf Cattail	Typha latifolia	2	Rare		X	X			X
Wingstem	Verbesina alterniflora	2	Rare	_	X	X			X
Bushclover	Cuscuta pentagona	2	Rare	_	X	X			X
Cat Briar	Smilax glauca	2	Rare		X	X			X

Percent Areal Coverage of Grasses and Forbs 95%

II. SHRUBS AND TREES

Common Name	Scientific Name			Planted		Volunteer		Invasive	
				Yes	No	Yes	No	Yes	No
Box Elder	Acer negundo			X		X			X
Chinkapin Oak	Quercus pumila				X	X			X
Sycamore	Platanus occidentalis			X			X		X
Pin Oak	Quercus palustris			X			X		X
Shumard Oak	Quercus shumardii			X			X		X
Sumac	Rhubus sp.	·			X	X			X

Survival Class $\leq 25\%$ 26-50% 51-75% > 75% (Shrubs and Trees

 $^{^{1}}$ - Invasive species based on: Nice, G. 2006. Noxious and Invasive Weeds and the Weed Laws in Indiana. Purdue Extension Weed Science. Revised 12/06

Inspectors	S. Jones/P. Farquharson
Date	September 28, 2010
Parcels/Cover Type	Parcel 3, Parcel 205/Grass-Forb Meadow

I. GRASSES AND FORBS

Common Name	Scientific Name	Abundance		Seeded		Volunteer		Invasive	
		Rating	Category	Yes	No	Yes	No	Yes	No
Redtop	Agrostis sp.	5	Very Common	X			X		X
Orchardgrass	Dactylus glomerata	3	Rare/Common		X	Х			X
Switchgrass	Panicum virgatum	3	Rare/Common		X	X			X
Canadian Wild Rye	Elymus canadensis	5	Very Common	Х			Х		X
Tall Fescue	Schedonorus phoenix	3	Rare/Common	Х			Х		X
Side Oats Gramma	Bouteloua curtipendula	3	Rare/Common	X			X		X
Lurid Sedege	Carex lurida	3	Rare/Common		X	X			X
Wood Aster	Symphyotrichum cordifolium	3	Rare/Common		X	X			X
Swamp Smartweed	Polygonum coccineum	1	Observed		X	X			X
Swamp Beggarstick	Bidens connata	1	Observed		X	X			X
Burdock	Arctium sp.	2	Rare		X	Х			X

Percent Areal Coverage of Grasses and Forbs	85%
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II. SHRUBS AND TREES

Common Name	Scientific Name		nted	Volunteer		Invasive	
		Yes	No	Yes	No	Yes	No
Sycamore	Platanus occidentalis		X	X			X
Shumard Oak	Quercus shumardii		Χ	Χ			Χ
Sumac	Rhus sp.		Χ	Χ			Χ

Survival Class	n/a	<u>≤</u> 25%	26-50%	51-75%	> 75%
(Shrubs and Trees		•			

¹ - Invasive species based on: Nice, G. 2006. Noxious and Invasive Weeds and the Weed Laws in Indiana. Purdue Extension Weed Science. Revised 12/06

Inspectors	S. Jones/P. Farquharson		
Date	September 29, 2010		
Parcels/Cover Type	Parcel 401/Grass-Forb Cover Adjacent to Conveyance Channel		

I. GRASSES AND FORBS

Common Name	Scientific Name	Abundance		Seeded		Volunteer		Invasive	
		Rating	Category	Yes	No	Yes	No	Yes	No
Great Ragweed	Ambrosia trifida	4	Common		Χ	Χ			X
Queen Anne's Lace	Daucus carota	4	Common		X	X			X
Canada Goldenrod	Solidago canadensis	2	Rare		Χ	Χ			Χ

Percent Areal Coverage of Grasses and Forbs

Banks of Water Course - 60%/Channel - No Vegetation

¹ - Invasive species based on: Nice, G. 2006. Noxious and Invasive Weeds and the Weed Laws in Indiana. Purdue Extension Weed Science. Revised 12/06