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February 13, 2004 Reference No. 13968

Mr. Brad Stimple
U.S. EPA Region 5 – Cleveland Office
25089 Center Ridge Road
Westlake, OH
44145

Dear Mr. Stimple:

Re: Upstream Parcels Work Plan: Addendum No. 2
Administrative Order on Consent for Removal Action
Docket No. V-W-03-C-747
GM Powertrain Group, Bedford Indiana Plant
Bedford, Indiana

Consistent with the submittal requirements of Section VIII, Paragraph 39a of the Administrative Order on Consent (AOC), effective July 31, 2003, and pursuant to the Upstream Parcels Removal Action Work Plan sections 3.7 Soil Excavation, Handling and Backfilling and 3.8 Creek Sediment Removal and Handling, we are providing the following supplemental information on the removal of bedrock materials as Addendum No. 2. The attached Addendum has been modified based recent discussions.

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

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Mary Kathryn Kelly for
Jim McGuigan, P.E.

MK/rcc/17
Encl.

c.c.: see Distribution List

Distribution List

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UPSTREAM PARCELS REMOVAL ACTION WORK PLAN: ADDENDUM NO. 2

SELECT ROCK REMOVAL TO FACILITATE REMOVAL ACTION CLEANUP ACTIVITIES

The Removal Action work completed within the first several hundred feet downstream of Outfall 002 in an unnamed tributary of Bailey's Branch Creek indicates the presence of occasional solution enlarged vertical fractures which may be connected to solution enlarged bedding planes at or near the current bedrock surface within the creek channel. These vertical fractures are generally identifiable after removal of overlying loose rock, soil and sediment. Depending on their size and location, larger diameter vertical fractures could have allowed for the historical discharges of oil and/or oily sediments to accumulate within the fractures and spread out along the near surface bedrock bedding planes.

This Work Plan Addendum has been prepared to describe the removal of limited areas of surficial bedrock within and adjacent to the creek channel necessary to allow the efficient removal of oily soil and sediment in these larger cracks. Upon removal of soil, sediment and loose rock from work areas of the creek channel, but prior to backfilling and restoration, CRA personnel will inspect the bedrock surface for significant accumulation of oily materials in larger fractures. If such oily materials are observed but access does not allow direct removal, efforts will be initiated to remove adjacent surficial bedrock. Surficial fractures will be removed to the extent practicable based upon use of applicable construction techniques. Due to the competence of the bedrock, excavation equipment utilized for the soil/sediment removal may be unable to remove areas of the bedrock that interfere with the attainment of the Removal Action objectives. Localized fracturing or cutting of the bedrock along the existing visible vertical cracks will be accomplished using equipment such as an excavator mounted hoe-ram. Alternatively, a self propelled trenching machine of suitable size and power might be used to remove portions of the bedrock to allow soil and/or sediment removal.

Bedrock removed to facilitate the removal of sediment will be handled and disposed of in accordance with the characterization of the sediment. As the nature of rock excavation is difficult even with modern equipment, uncertainty exists as to the amount of time that will be required to facilitate the removal of impacted sediment observed within the vertical cracks. Appropriate dust control measures will be employed as necessary during this work.

If, after completion of the removal activities described above, significant quantities of oily materials remain within the bedrock, but which are observed to be exfiltrating back into the creek channel, further control will be necessary. However, such controls would be implemented as part of the Site Source Control activities. This may include construction of a collection and treatment system for PCB impacted water and/or oil, monitoring, or other action as required by the Site Source Control Work Plan.