RCRA FACILITY INVESTIGATION

QUARTERLY PROGRESS REPORT #38 THIRD QUARTER 2010

GM CETC - BEDFORD FACILITY 105 GM DRIVE BEDFORD, INDIANA

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Prepared For:
General Motors LLC

GM CETC Bedford Facility Date: October 14, 2010 Section: Quarterly Progress Report #38

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1.0 <u>INTRODUCTION</u>

This Quarterly Progress Report is submitted by General Motors LLC (GM) 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, executed on March 20, 2001, and modified on October 1, 2002, March 29, 2007, and May 9, 2008. This report covers the period of the third calendar quarter of 2010 for the GM Castings, Engines, Transmissions, and Components (CETC; formerly 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) are being addressed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Removal Action (RA) Program, pursuant to the Administrative Order on Consent (AOC) between U.S. EPA and General Motors Corporation (effective July 31, 2003). These activities are described in more detail within the CERCLA Progress Reports referred to herein.

The next quarterly progress report, covering the Fourth Quarter of 2010, will be submitted on or before January 15, 2011.

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2.0 LIST OF COMPLETED ACTIVITIES

The following activities took place and the following documents were prepared and distributed during this quarter:

- Conference calls were held with U.S. EPA and the Indiana Department of Environmental Management (IDEM) on July 15 and 30; August 20; and September 2 and 23, 2010, to discuss project progress.
- Fact Sheet 29 was published on September 22, 2010.
- An email giving clarification of prior Spring 018 sampling frequencies was sent to U.S. EPA and IDEM on July 12, 2010.
 - U.S. EPA approved the quarterly sampling frequency for Spring 018 on July 13, 2010.
- The Vault Annual Compliance Report covering 2009 was submitted to U.S. EPA and IDEM on July 14, 2010.
- Responses to IDEM and U.S. EPA comments on the AOI 8 Investigation Work Plan were submitted to IDEM and U.S. EPA via email on July 28, 2010:
 - o U.S. EPA approved the AOI 8 Investigation Work Plan with the proposed amendments on August 24, 2010;
 - o IDEM approved the AOI 8 Investigation Work Plan with the proposed amendments on September 2, 2010; and
 - Final AOI 8 Investigation Work Plan Addendum incorporating responses to comments was submitted on Sept 3, 2010.
- U.S. EPA requested that the to-be-finalized West Plant parking lot design include proposed monitoring well locations, on August 23, 2010.
- A sampling plan to further delineate fill material on properties west of the Facility was submitted to U.S. EPA on August 24, 2010.
 - o U.S. EPA sent comments on the plan on August 31, 2010.
 - o Responses to U.S. EPA comments were submitted on September 28, 2010.
- A work plan to conduct additional delineation sampling of floodplain soil under the Downstream staging area 'G' soil pad was submitted to U.S. EPA and IDEM on September 3, 2010.
 - o Photos of the on-going soil removal at staging area 'G' being hauled to the East Plant Area as grading fill were sent to U.S. EPA on September 13, 2010.

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- O Comments on the delineation sampling plan were received from MLC and U.S. EPA on September 8, 2010.
- A revised plan incorporating comments received from U.S. EPA and MLC was submitted to U.S. EPA on September 10, 2010.
- o U.S. EPA approved the delineation sampling plan on September 10, 2010.
- Construction on the East Plant Area Cover System in the AOI 8 work area continued. Work in areas north of AOI 8 (east and west of the storm pond) commenced before the end of the quarter.
 - Photos showing recent progress of the East Plant Area Cover System were submitted to U.S. EPA and IDEM on September 13, 2010
- An information session for the public was held on September 30, 2010, at the CRA Field Trailer. Invitations were mailed to the project neighbors and the meeting was also announced in the Bedford Times Mail. The Community Liaison Panel (CLP) met on October 1, 2010.
- The CERCLA RA Progress Reports covering May/June and July/August 2010 were submitted during the Second Quarter of 2010.

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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:

- Approval to reduce sampling at Spring 018C from the existing monthly schedule to a quarterly schedule.
- Approval of the AOI 8 Work Plan Addendum by U.S. EPA on August 24, 2010.
- Approval of the Staging Area G delineation sampling plan.
- Publication of Fact Sheet 29 on September 22, 2010.
- Public meeting held on September 30, 2010.

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4.0 COMMUNITY RELATIONS

The telephone number for public contact is 812-277-8954 (Katie Kamm, CRA). Individual meetings can also be arranged to discuss sampling results with residents as requested.

A quarterly meeting to review project status was held for both the neighbors along the creek and around the plant, as well as with the general public. The quarterly meeting covering the Third Quarter was held on September 30, 2010. The meeting provided a regular project update information session from 6:00 PM to 8:00 PM at the CRA Field Trailer. Presentations for the meetings are posted on the GM website at www.bedfordpowertraincorrectiveaction.com. A public meeting for the Fourth Quarter of 2010 will be scheduled for December 2010 on a date to be determined.

Fact Sheet 28 was issued on June 11, 2010.

The CLP meeting covering the Second Quarter was held on October 1, 2010. The CLP was formed to provide additional communication avenues for the community and the meetings are currently being held at the CRA construction trailer approximately every three months or more frequently if information on the project changes significantly. Previous CLP meeting minutes can be reviewed on the GM website at www.bedfordpowertraincorrectiveaction.com. The CLP meeting covering the Fourth Quarter 2010 will be scheduled for December 2010 on a date to be determined.

The Information Center located at the plant lobby is accessible by appointment through Ms. Katie Kamm, at the project phone number 812-277-8954. The documents repository is no longer located at the Bedford Public Library. All data that were located at the Library repository can be found on the aforementioned web site.

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5.0 CHANGES IN PERSONNEL DURING THE REPORTING PERIOD

Primary over-site personnel for CRA and Sevenson Environmental Services (SES) remain unchanged. CRA and SES have both increased the number of personnel at the Site to support the current work activities for the East Plant Area Cover System during the construction season. Additional personnel will continue to be added as required to support additional work areas as required.

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6.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

Work projected for the next reporting period includes:

- Conducting a general public information session in December 2010 on a date to-bedetermined.
- Conducting a CLP Meeting in December 2010 on a date to-be-determined.
- Preparing and distributing Fact Sheet 30 in the next quarter.
- Complete Cover System construction within the AOI 8 area, including paving, and continue working north on the Cover System as areas are completed.
- Complete AOI 8 investigation including installation of two monitoring wells, packer testing, and pump test.
- Complete installation of two monitoring wells in the West Plant Area fill area.
- Complete placement of grading fill in AOI-15 with soil from Staging Area 'G'.
- Complete design of Pilot Groundwater Collection Trench.
- Submit Environmental Indicator (EI) CA750 sample results summary.
- Prepare work areas for winter and spring rainy seasons.
- Maintaining temporary liner covers and runoff water collection and treatment where necessary.
- Prepare a draft Performance Based Corrective Action Agreement between GM LLC and U.S. EPA.

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

Packages of analytical data from creek remediation verification sampling have been submitted as they become available and will continue to be submitted during the next reporting period when or if sampling is conducted. Any other sampling data collected during the quarter will be submitted under separate cover once validation is completed.