

GENERAL MOTORS CORPORATION

**GM POWERTRAIN BEDFORD FACILITY
105 GM DRIVE
BEDFORD, INDIANA
EPA ID #IND006036099**

***ADMINISTRATIVE ORDER ON CONSENT
U.S. EPA DOCKET NO. V-W-'03-C-747
REMOVAL ACTION***

MONTHLY PROGRESS REPORT - SEPTEMBER 2003

OCTOBER 14, 2003

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1.0 INTRODUCTION

This Monthly Progress Report is submitted in accordance with the ADMINISTRATIVE ORDER ON CONSENT (AOC) FOR REMOVAL ACTION Proceeding Under Sections 104, 106(a), 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. SS 9604, 9606(a), 9607, and 9622 (U.S. EPA Docket No.: V-W-'03-C-747) effective July 31, 2003.

The next monthly Progress Report, for the month of October 2003, will be submitted on or before November 15, 2003.

2.0 SIGNIFICANT DEVELOPMENTS IN THIS MONTH

- Access Agreements, as outlined in Appendix 6 of the AOC, have been obtained from 112 Bailey Scales Road, 125 Bailey Scales Road, 201 Bailey Scales Road, and 158 Broomsage Road. Access Agreements are now in place for all of the Parcels included in the approved Upstream Parcels Work Plan and Parcel 22 Work Plan.
- A report was submitted to U.S. Fish and Wildlife Service (USFWS) on September 11, 2003, summarizing the results of the bat mist-netting survey.
- Additional information requested by the Indiana Department of Natural Resources (IDNR) regarding the stream restoration was submitted on September 11, 2003.
- Tree removal has been completed on the area north of AOI4 and on Parcels 3, 4, 5, 6, 8, 9, 10, 11, 12, and 205. The remainder of the Parcels will be cleared sequentially as necessary to support the Removal Action and in accordance with the approved Work Plans.
- Excavation of the channel area north of AOI4 began on September 11, 2003. Approximately 650' of the channel reach has been excavated and 1,500 tons of waste material has been removed. Excavation will continue sequentially downstream.
- Background air monitoring was conducted between September 5 and 8, 2003. Air monitoring began with the initiation of excavation activities on September 11, 2003.
- Test Pits have been conducted on the area north of AOI4 and Parcel 401 where historical fill was discovered.
- The Downstream Removal Action Work Plan is undergoing some final edits and is scheduled to be submitted to the U.S. EPA on or before October 29, 2003.
- Timber Evaluations have been completed on Parcels 003, 004, 005, and 006. Timber evaluation summaries are currently being prepared and will be delivered to the U.S. EPA and the residents once finalized.

3.0 SUMMARIES OF ALL ANTICIPATED PROBLEMS AND PLANNED RESOLUTIONS

- Access Agreements, as outlined in Appendix 6 of the AOC, have been provided to all property owners where access was not previously obtained. Access has still not been received from property owners at 314 Bailey Scales Road, 145 Broomsage Road, 478 Bud Ikerd Road, 826 Bud Ikerd Road, 535 Rawlins Mill Road, 1596 Peerless Road, and 2499 Peerless Road, 206 Shandell Drive, a property south of the confluence of Bailey's Branch Creek and Pleasant Run Creek (Parcel 29), and a property on Bud Ikerd Road east of Peerless Road (Parcel 36).
 - GM received a 30-day extension (which expires October 14, 2003) to the time frame for access agreements. An additional request will be made by GM for an extension of the AOC timeframes to obtain the remaining access.
 - GM, U.S. EPA and IDEM will continue meeting with the property owners to obtain access.
- USFWS has requested additional information regarding Parcels downstream of Parcel 22 prior to authorization of tree removal in those areas. This additional information includes a Biological Assessment on potential impacts of PCBs on the Indiana Bat.
 - GM is in consultation with USFWS and the U.S. EPA and is continuing to prepare the requested information.
- Approval to initiate the cleanup was not been received during September from IDEM Water Quality Division for work within the channel.
 - GM is continuing to work with IDEM Water Quality Division to respond to their questions, including submittal of additional documents as requested. GM is anticipating concurrence from IDEM regarding work within the channel early in October.
- Comments were provided by the Indiana Department of Natural Resources (IDNR) concerning GM's submittal on Mitigation Plan - Construction in a Floodway Permit.
- GM and CRA have submitted requested additional information and will continue discussions with IDNR to resolve issues. During excavation activities north of AOI4 fill material was encountered. After removing approximately 1,500 tons of waste from the area and taking it to the landfill, confirmatory samples were collected from the remaining fill. Some of these confirmatory samples were over 50 ppm PCB. As a result, excavation activities were temporarily halted in the area of the fill until it could be delineated and landfill, state and federal authorities were informed. Thirteen additional samples were collected from the soils at the landfill. Only two were over 50 ppm. However, in an abundance of caution, it was determined to remove the entire pile and place it in a landfill that can accept materials over 50 ppm.

- With the aid of historical aerial photographs and discussions with the adjoining property owner the extent of the fill was delineated. Test pits were conducted to further delineate the fill area and the PCB levels. Work continues on the delineation and evaluation in this area.

4.0 PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- The following is a list of anticipated work for the next reporting period:
 - Obtaining Access Agreements from residents in the affected area (continuing progress);
 - Coordination of Tree Removal Activities with U.S. EPA and USFWS for portions of the creek between Parcel 12 and Parcel 22, and downstream of Parcel 22 (continuing progress);
 - Coordination with USACE and IDEM for work in the stream channel (continuing progress);
 - GM is preparing the Biological Assessment requested by USFWS;
 - Removal Action activities along the stream are expected to continue, starting with the upstream section first and then proceeding downstream, assuming that access can be obtained from residents; and
 - Additional evaluation of the fill area north of AOI4 will be completed and excavation will be reinitiated.

ATTACHMENT A

DELIVERABLES SUMMARY

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<i>Deliverable</i>	<i>Reference</i>	<i>Deadline</i>	<i>Deliverable Due Date</i>	<i>Status</i>
Final Parcel 22 Workplan	AOC IV.23; VIII.34.a	Approved July 23, 2003	July 23, 2003	complete
Final Upstream Workplan	AOC IV.25; VIII.34.b	Approved July 23, 2003	July 23, 2003	complete
Designation of Contractors and Project Coordinator	AOC VII.30; VII.31	CRA & McGuigan – Effective Date of Order Other contractors – 5 business days prior to commencement of work	July 31, 2003	complete
Contractor HASP	'U.S. EPA Approval Letter, July 23, 2003'	before work is to begins		complete
QAPP	AOC VIII.34.c; VIII.37.a	QAPP – 10 business days AED *	August 14, 2003	complete
OMMP	AOC VIII.38	OMMP – 30 business days after completion of each portion of Work in Paragraph 34. Final OMMP due with Final Report		
Draft Downstream Workplan	AOC VIII.34.d; VIII.35.a	90 days AED	October 29, 2003	in progress
Draft Site Source Control Workplan	AOC VIII.34.e; VIII.35.a	15 business days AED	August 21, 2003	submitted August 21, 2003
Monthly Progress Reports	AOC VIII.39.a	1 st 30 days AED 15 th of each month thereafter	August 30, 2003 October 15, 2003	submitted August 19, 2003 submitted October 14, 2003
Final Report	AOC VIII.40	Within 90 days after required info is received and work completed		

Note:

AED = After Effective Date of Administrative Order on Consent