

**New York State
Department of Environmental Conservation**

**Brownfield Cleanup Program (BCP)
ECL ARTICLE 27/TITLE 14**

DEPARTMENT USE ONLY BCP SITE # _____

07/07

Section I. Requestor Information			
NAME Delphi Automotive Systems LLC			
ADDRESS 200 Upper Mountain Road			
CITY/TOWN Lockport		ZIP CODE 14094	
PHONE 716-439-2192	FAX 716-439-3048	E-MAIL roy.d.knapp@delphi.com	
NAME OF REQUESTOR'S REPRESENTATIVE Richard Eisenman			
ADDRESS Delphi, PO Box 92700			
CITY/TOWN Rochester		ZIP CODE 14692	
PHONE 585-647-4766	FAX 585-647-4878	E-MAIL richard.c.eisenman@delphi.com	
NAME OF REQUESTOR'S CONSULTANT Christopher Boron			
ADDRESS GZA Geoenvironmental of New York, 535 Washington Street, 11 th Floor			
CITY/TOWN Buffalo		ZIP CODE 14203	
PHONE 716-844-7046	FAX 716-685-3309	E-MAIL cboron@gza.com	
NAME OF REQUESTOR'S ATTORNEY Barry Kogut, Esq.			
ADDRESS Bond, Schoeneck & King PLLC, One Lincoln Center			
CITY/TOWN Syracuse		ZIP CODE 13202-1355	
PHONE (315) 218-8181	FAX (315) 218-8481	E-MAIL KogutB@bsk.com	
THE REQUESTOR MUST CERTIFY THAT HE/SHE IS EITHER A PARTICIPANT OR VOLUNTEER IN ACCORDANCE WITH ECL § 27-1405(1) BY CHECKING ONE OF THE BOXES BELOW:			
<input checked="" type="checkbox"/> PARTICIPANT A requestor who either 1) was the owner of the site at the time of the disposal of hazardous waste or discharge of petroleum or 2) is otherwise a person responsible for the contamination, unless the liability arises solely as a result of ownership, operation of, involvement with the site subsequent to the disposal of hazardous waste or discharge of petroleum.		<input type="checkbox"/> VOLUNTEER A requestor other than a participant, including a requestor whose liability arises solely as a result of ownership, operation of or involvement with the site subsequent to the disposal of hazardous waste or discharge of petroleum. NOTE: By checking this box, the requestor certifies that he/she has exercised appropriate care with respect to the hazardous waste found at the facility by taking reasonable steps to: i) stop any continuing discharge; ii) prevent any threatened future release; and iii) prevent or limit human, environmental, or natural resource exposure to any previously released hazardous waste.	
Requestor Relationship to Property (check one):			
<input type="checkbox"/> Previous Owner <input checked="" type="checkbox"/> Current Owner <input type="checkbox"/> Potential/Future Purchaser <input type="checkbox"/> Other			
If requestor is not the site owner, requestor will have access to the property throughout the BCP project. <input type="checkbox"/> Yes <input type="checkbox"/> No			
(Note: proof of site access must be submitted for non-owners)			

Section II. Property Information Summary Sheet

PROPERTY NAME Delphi Lockport Building 6 Tank Area

ADDRESS/LOCATION 200 Upper Mountain Road CITY/TOWN Lockport ZIP CODE 14094

MUNICIPALITY (IF MORE THAN ONE, LIST ALL): Lockport

COUNTY Niagara SITE SIZE (ACRES) 0.54

LATITUDE (degrees/minutes/seconds) 43° 10' 10" LONGITUDE (degrees/minutes/seconds) -78° 43' 59"

HORIZONTAL COLLECTION METHOD: SURVEY GPS MAP HORIZONTAL REFERENCE DATUM:

FOR EACH PARCEL, FILL OUT THE FOLLOWING TAX MAP INFORMATION (if more than three parcels, attach additional information)

Parcel Address	Parcel No.	Section No.	Block No.	Lot No.	Acreage
200 Upper Mountain Road, Lockport (BCP site is a portion of this parcel)	108.13-1-1				0.54

- Do the property boundaries correspond to tax map metes and bounds? **See Attachment 1** Yes No
If no, please attach a metes and bounds description of the property. **See Attachment 2**
- Is the required property map attached to the application? (application will not be processed without map) Yes No
- Is the property part of a designated En-zone pursuant to Tax Law § 21(b)(6)? Yes No
For more information go to: http://www.nylovesbiz.com/BrownField_Redvelopment/default.asp.
If yes, identify area (name)
 50% 100% of the site is in the Ez-zone (check one)


PROPERTY DESCRIPTION NARRATIVE: This application covers the portion of Delphi's Lockport Complex known as Building 6 Tank Area. The Building 6 Tank Farm is a small portion of the Parcel listed above. Building 6 was built in 1966 and the current underground storage tanks (USTs) were installed in 1985. The Building 6 Tank Area consists of 6 USTs with a total storage capacity of 29,500 gallons. The contents of the USTs are used primarily for automotive component testing in the Building 6 Wind Tunnel facility. Delphi is currently planning on removing the USTs in 2008 or 2009 and replacing the tanks with aboveground storage tanks, in the general vicinity.

List of Existing Easements (type here or attach information)

Easement Holder	Description
NO EASEMENTS	

List of Permits issued by the NYSDEC or USEPA Relating to the Proposed Site (type here or attach information)

Type	Issuing Agency	Description
Title V Air Permit	NYSDEC	permit is for entire Delphi Lockport Complex
MOSF	NYSDEC	petroleum storage
Sewer Permit	City of Lockport	permit is for entire Delphi Lockport Complex

Initials of each Requestor:


Section III. Current Site Owner/Operator Information

OWNER'S NAME (if different from requestor) not applicable

ADDRESS

CITY/TOWN ZIP CODE

PHONE FAX E-MAIL

OPERATOR'S NAME (if different from requestor or owner) not applicable

ADDRESS

CITY/TOWN ZIP CODE

PHONE FAX E-MAIL

Section IV. Requestor Eligibility Information (Please refer to ECL § 27-1407)

If answering "yes" to any of the following questions, please provide an explanation as an attachment.

1. Are any enforcement actions pending against the requestor regarding this site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
2. Is the requestor subject to an existing order relating to contamination at the site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3. Is the requestor subject to an outstanding claim by the Spill Fund for this site?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
4. Has the requestor been determined to have violated any provision of ECL Article 27?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
5. Has the requestor previously been denied entry to the BCP?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
6. Has the requestor been found in a civil proceeding to have committed a negligent or intentionally tortious act involving contaminants?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
7. Has the requestor been convicted of a criminal offense that involves a violent felony, fraud, bribery, perjury, theft, or offense against public administration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
8. Has the requestor knowingly falsified or concealed material facts or knowingly submitted or made use of a false statement in a matter before the Department?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
9. Is the requestor an individual or entity of the type set forth in ECL 27-1407.8(f) that committed an act or failed to act, and such act or failure to act could be the basis for denial of a BCP application?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Section V. Property Eligibility Information (Please refer to ECL § 27-1405)

1. Is the property listed on the National Priorities List?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
2. Is the property listed on the NYS Registry of Inactive Hazardous Waste Disposal Sites? If yes, please provide: Site # Class #	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3. Is the property subject to a permit under ECL Article 27, Title 9, other than an Interim Status facility? If yes, please provide: Permit type: EPA ID Number: Date permit issued: Permit expiration date:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
4. Is the property subject to a cleanup order under navigation law Article 27 or ECL Article 17 or Title 10? If yes, please provide Order #	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
5. Is the property subject to a state or federal enforcement action related to hazardous waste or petroleum? If yes, please provide explanation as an attachment.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Section VI. Project Description

What stage is the project starting at? investigation remediation

Please attach a description of the project which includes the following components: **See Attachment 3**

- Purpose and scope of the project
- Estimated project schedule

Section VII. Property's Environmental History

To the extent that existing information/studies/reports are available to the requestor, please attach the following:

1. Environmental Reports See Attachment 4
 A Phase I environmental site assessment report prepared in accordance with ASTM E 1527 (American Society for Testing and Materials: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process), and all environmental reports related to contaminants on or emanating from the site.
 If a final investigation report is included, indicate whether it meets the requirements of ECL Article 27-1415(2): Yes No

2. Sampling Data: Indicate known contaminants and the media which are known to have been affected:

Contaminant Category	Soil	Groundwater	Surface Water	Sediment	Soil Gas
Petroleum		26 mg/l			
Chlorinated Solvents					
Other VOCs					
SVOCs		1.9 mg/l			
Metals		673 mg/l			
Pesticides					
PCBs					
Other:					

*Please describe:

3. Suspected Contaminants: Indicate suspected contaminants and the media which may have been affected:

Contaminant Category	Soil	Groundwater	Surface Water	Sediment	Soil Gas
Petroleum	X				
Chlorinated Solvents					
Other VOCs					
SVOCs					
Metals					
Pesticides					
PCBs					
Other:					

*Please describe:

4. INDICATE KNOWN OR SUSPECTED SOURCES OF CONTAMINANTS:

<input type="checkbox"/> Above Ground Pipeline or Tank	<input type="checkbox"/> Lagoons or Ponds	<input checked="" type="checkbox"/> Underground Pipeline or Tank	<input type="checkbox"/> Surface Spill or Discharge
<input type="checkbox"/> Routine Industrial Operations	<input type="checkbox"/> Dumping or Burial of Wastes	<input type="checkbox"/> Septic tank/lateral field	<input type="checkbox"/> Drums or Storage Containers
<input type="checkbox"/> Adjacent Property	<input type="checkbox"/> Seepage Pit or Dry Well	<input type="checkbox"/> Foundry Sand	<input type="checkbox"/> Electroplating
<input type="checkbox"/> Coal Gas Manufacture	<input type="checkbox"/> Industrial Accident	<input type="checkbox"/> Unknown	

Other:

5. INDICATE PAST LAND USES:

<input type="checkbox"/> Coal Gas Manufacturing	<input checked="" type="checkbox"/> Manufacturing	<input type="checkbox"/> Agricultural Co-op	<input type="checkbox"/> Dry Cleaner	<input type="checkbox"/> Salvage Yard	<input type="checkbox"/> Bulk Plant
<input type="checkbox"/> Pipeline	<input type="checkbox"/> Service Station	<input type="checkbox"/> Landfill	<input type="checkbox"/> Tannery	<input type="checkbox"/> Electroplating	<input type="checkbox"/> Unknown

Other:

6. Owners See Attachment 5

A list of previous owners with names, last known addresses and telephone numbers (describe requestor's relationship, if any, to each previous owner listed. If no relationship, put "none").

7. Operators See Attachment 5

A list of previous operators with names, last known addresses and telephone numbers (describe requestor's relationship, if any, to each previous operator listed. If no relationship, put "none").

Section VIII. Contact List Information

Please attach, at a minimum, the names and addresses of the following: **See Attachment 6**

1. The chief executive officer and planning board/dept. chair of each county, city, town and village in which the property is located.
2. Residents, owners, and occupants of the property and properties adjacent to the property.
3. Local news media from which the community typically obtains information.
4. The public water supplier which services the area in which the property is located.
5. Any person who has requested to be placed on the contact list.
6. The administrator of any school or day care facility located on or near the property.
7. The location of a document repository for the project (e.g., local library). In addition, attach a copy of a letter sent to the repository acknowledging that it agrees to act as the document repository for the property.

Section IX. Land Use Factors (Please refer to ECL § 27-1415(3))

Current Use: Residential Commercial Industrial Vacant Recreational (check all that apply)

Intended Use: Unrestricted Residential Commercial Industrial (check all that apply)

Please check the appropriate box and provide an explanation as an attachment if appropriate. Provide a copy of the local zoning classifications, comprehensive zoning plan designations, and/or current land use approvals. **See Attachment 1**

	Yes	No
1. Do current historical and/or recent development patterns support the proposed use? (See #12 below re: discussion of area land uses)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is the proposed use consistent with applicable zoning laws/maps?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Is the proposed use consistent with applicable comprehensive community master plans, local waterfront revitalization plans, designated Brownfield Opportunity Area plans, other adopted land use plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Are there any Environmental Justice Concerns? (See § 27-1415(3)(p)).	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Are there any federal or state land use designations relating to this site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Do the population growth patterns and projections support the proposed use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7. Is the property accessible to existing infrastructure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. Are there important cultural resources, including federal and state historic or heritage sites or Native American religious sites within ½ mile?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9. Are there important federal, state or local natural resources, including waterways, wildlife refuges, wetlands, or critical habitats of endangered or threatened species within ½ mile?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. Are there floodplains within ½ mile?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. Are there any institutional controls currently applicable to the property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12. Describe on attachment the proximity to real property currently used for residential use, and to urban, commercial, industrial, agricultural, and recreational areas. See Attachment 7		
13. Describe on attachment the potential vulnerability of groundwater to contamination that might migrate from the property, including proximity to wellhead protection and groundwater recharge areas. See Attachment 7		
14. Describe on attachment the geography of the site. See Attachment 7		

Statement of Certification and Signatures

(By a requestor who is an individual)

I hereby affirm that information provided on this form and its attachments is true and complete to the best of my knowledge and belief. I am aware that any false statement made herein is punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

Date: _____ Signature: _____ Print Name: _____

(By a requestor other than an individual)

I hereby affirm that I am Exec. Director (title) of Delphi Automotive Systems LLC (entity); that I am authorized by that entity to make this application; that this application was prepared by me or under my supervision and direction; and that information provided on this form and its attachments is true and complete to the best of my knowledge and belief. I am aware that any false statement made herein is punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

Date: 11/15/07 Signature: [Signature] Print Name: John A. Jeffers

SUBMITTAL INFORMATION:

Three (3) complete copies are required.

- ♦ **Two (2)** copies, one paper copy with original signatures and one electronic copy in Portable Document Format (PDF) on a CD or diskette, must be sent to:

Chief, Site Control Section
New York State Department of Environmental Conservation
Division of Environmental Remediation
625 Broadway
Albany, NY 12233-7020

- ♦ **One (1)** paper copy must be sent to the DEC regional contact in the regional office covering the county in which the site is located. Please check our website for the address of our regional offices: <http://www.dec.ny.gov/about/776.html>

FOR DEPARTMENT USE ONLY

BCP SITE T&A CODE: _____ LEAD OFFICE: _____

**DELPHI AUTOMOTIVE –BUILDING 6 TANK AREA
LOCKPORT COMPLEX**

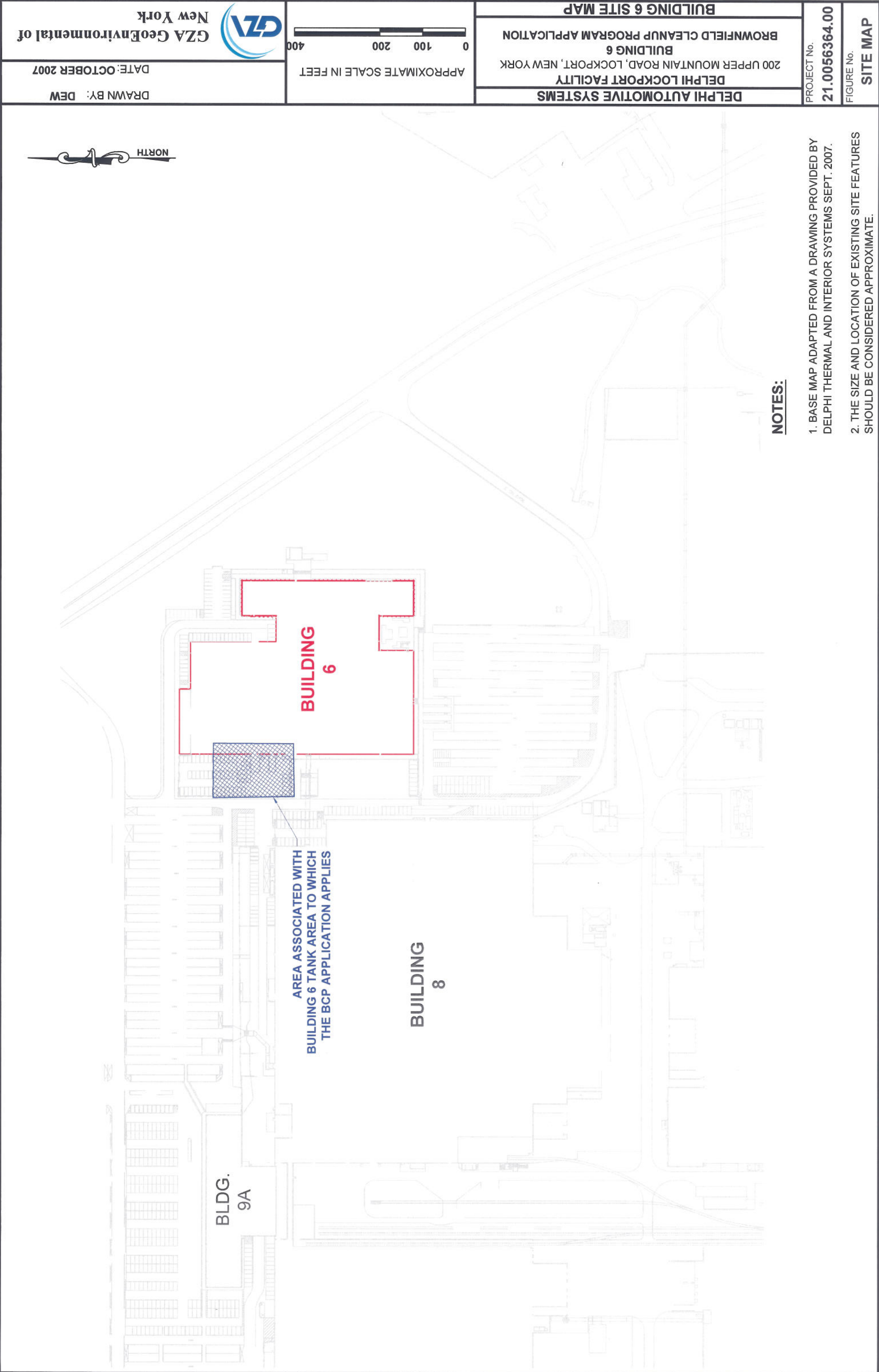
**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
BROWNFIELD CLEANUP PROGRAM APPLICATION**

ATTACHMENT 1

Building 6 Tank Area, Site Map

Tax Map and Parcel Information

Land Use Map



NOTES:

1. BASE MAP ADAPTED FROM A DRAWING PROVIDED BY DELPHI THERMAL AND INTERIOR SYSTEMS SEPT. 2007.
2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.

PARCELS OWNED BY DELPHI AUTOMOTIVE
LOCKPORT COMPLEX

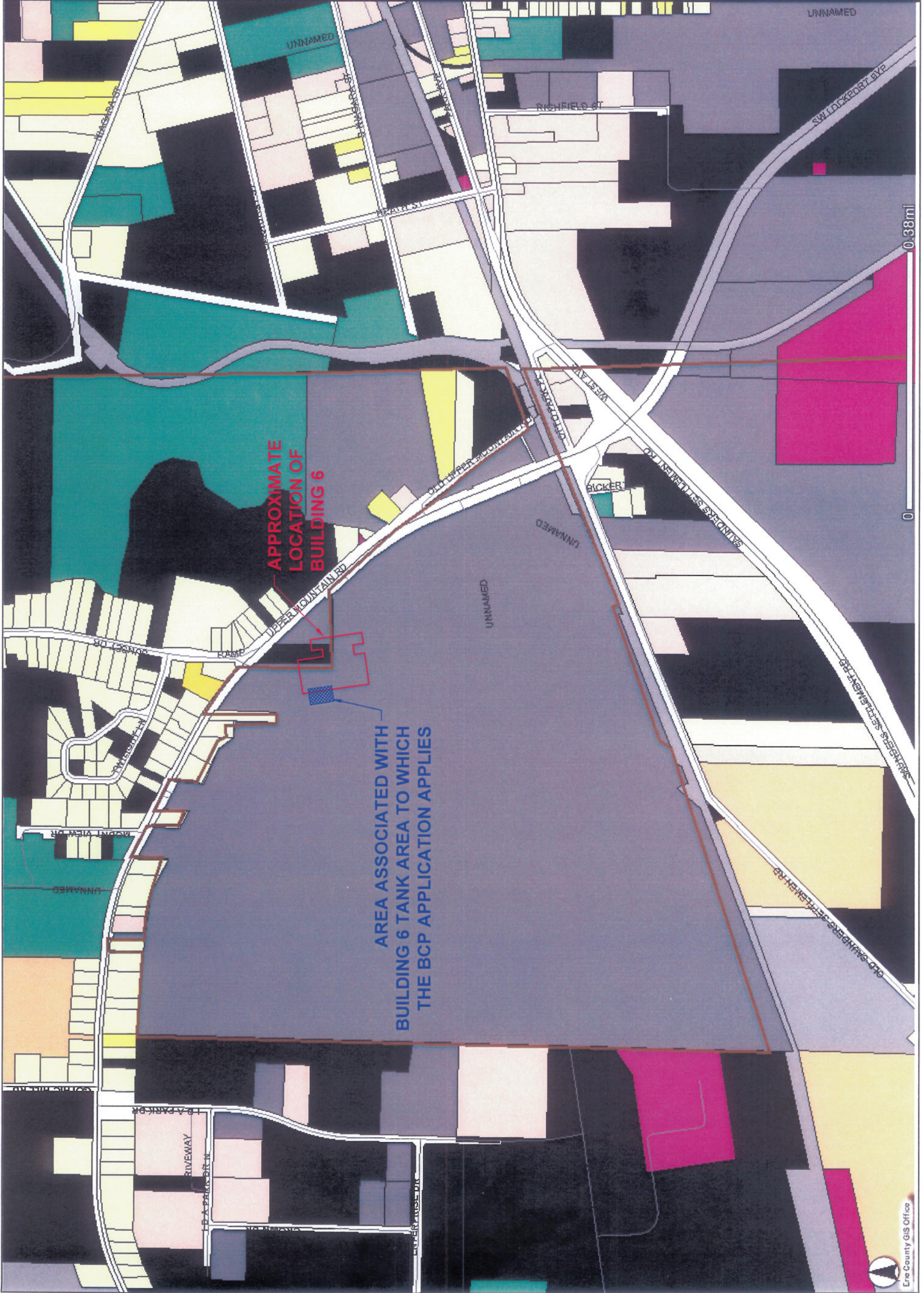
Parcels

Rec	PART_OF_PA	PIN	X_COORD	Y_COORD	FID_1	PRINTKEY	SWISCODE	OWNRNAME	PRCLSTREET	PRCLNUMB	PRCLMUNI
1	PIN	108.01-3-36	460250	1155080	57704	108.01-3-36	292600	Delphi Automotive Systems	Upper Mt Rd	5600	Lockport
2	PIN	108.01-3-35	460320	1155050	57703	108.01-3-35	292600	Delphi Automotive Systems	Upper Mt Rd	5602	Lockport
3	PIN	108.01-3-34	460480	1154950	57702	108.01-3-34	292600	Delphi Automotive Systems	Upper Mt Rd	5604	Lockport
4	PIN	108.00-1-16	461870	1154590	57474	108.00-1-16	292600	Delphi Automotive Systems	Upper Mt Rd	5701	Lockport
5	PIN	108.00-1-35.1	455910	1152130	57497	108.00-1-35.1	292600	Delphi Automotive Systems	Junction Rd	5077	Lockport
6	PIN	108.00-1-36	454780	1152030	57499	108.00-1-36	292600	Delphi Automotive Systems	Junction Rd	1000	Lockport
7	PIN	108.13-1-1	458130	1155130	382	108.13-1-1	290900	Delphi Automotive Sys LLC	Upper Mountain Rd	200	Lockport
8	PARTOFFPARCEL	108.13-1-1	461760	1153530	382	108.13-1-1	290900	Delphi Automotive Sys LLC	Upper Mountain Rd	200	Lockport
9	PARTOFFPARCEL	108.13-1-1	461940	1153200	382	108.13-1-1	290900	Delphi Automotive Sys LLC	Upper Mountain Rd	200	Lockport

Zoom to these records

Legend

	Municipalities
	Local Roads
	Water
	Primary Federal & State
	Secondary State & County
	Local Road
	Road Names
	Parcels
	Residential Single Family
	Residential Medium Density
	Residential High Density
	Residential Other
	Vacant
	Commercial
	Recreation
	Community Service
	Industrial
	Public Service
	Conservation Areas / Parks
	Other
	Parks



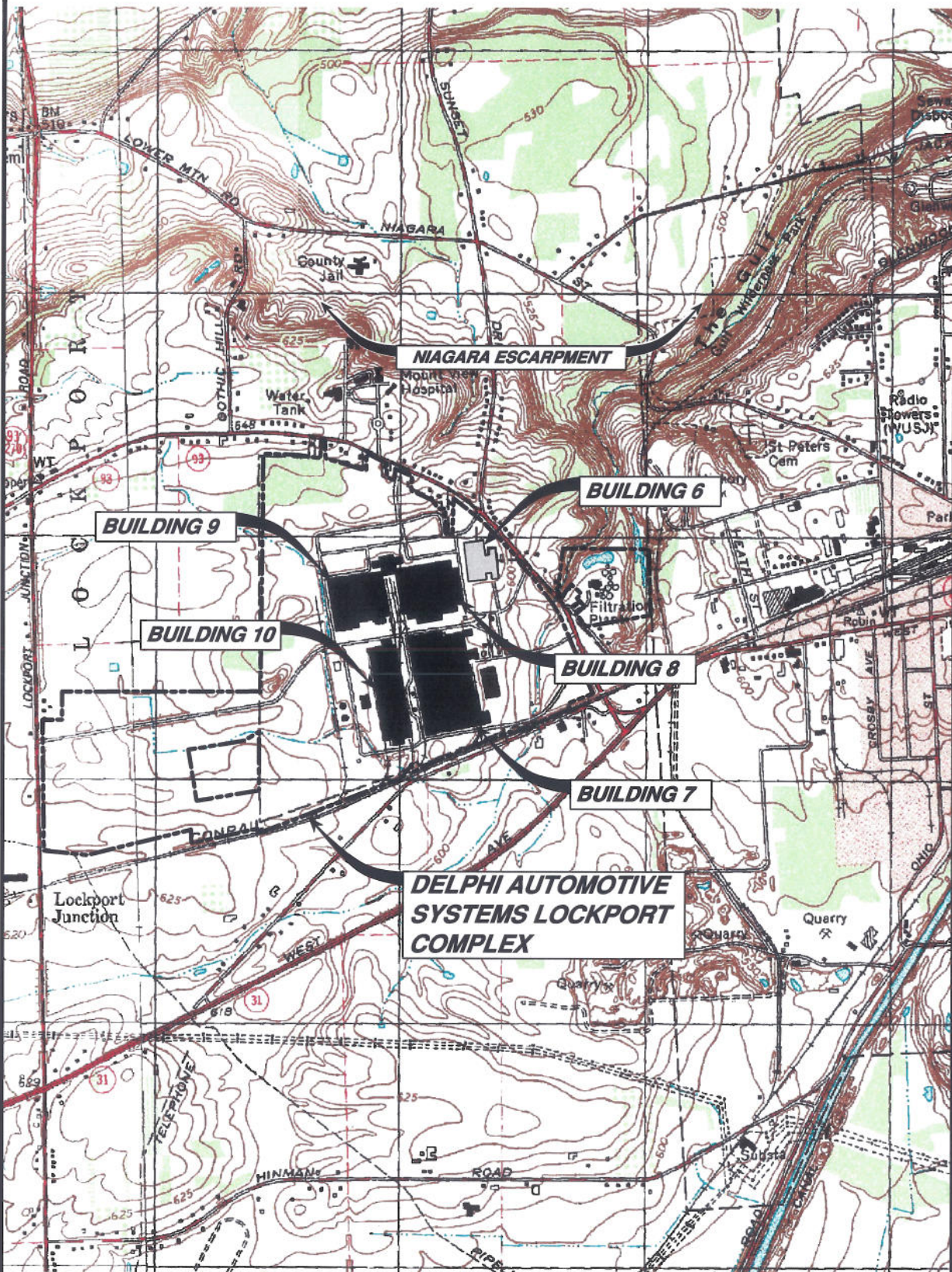
**DELPHI AUTOMOTIVE –BUILDING 6 TANK AREA
LOCKPORT COMPLEX**

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
BROWNFIELD CLEANUP PROGRAM APPLICATION**

ATTACHMENT 2

**FIGURE 1:
USGS Map
Locus Plan**

**FIGURE 2:
2005 Aerial Photograph
Building 6 Site Plan**



DRAWN BY: DEW
DATE: OCTOBER 2007

GZA GeoEnvironmental of New York




DELPHI AUTOMOTIVE SYSTEMS
DELPHI LOCKPORT FACILITY
 200 UPPER MOUNTAIN ROAD
 LOCKPORT, NEW YORK
BUILDING 6
BROWNFIELD CLEANUP PROGRAM APPLICATION
LOCUS PLAN

PROJECT No.
21.0056364.00

ATTACHMENT No. **2**

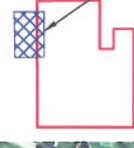
FIGURE No. **1**

NOTE:
 BASE MAP ADAPTED FROM U.S.G.S.
 TOPOGRAPHIC MAPS DOWNLOADED
 FROM TERRASERVER.MICROSOFT.COM





LEGEND:



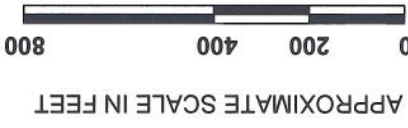
INDICATES BUILDING 6 FOOTPRINT

SHADING INDICATES AREA ASSOCIATED WITH BUILDING 6 TANK AREA TO WHICH THE BCP APPLICATION APPLIES

NOTES:

1. BASE MAP ADAPTED FROM A 2005 AERIAL PHOTOGRAPH DOWNLOADED FROM http://www.nysgis.state.ny.us/gateway/mg/interactive_main.html AND SITE OBSERVATIONS.

2. THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.



APPROXIMATE SCALE IN FEET

**DELPHI AUTOMOTIVE –BUILDING 6 TANK AREA
LOCKPORT COMPLEX**

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
BROWNFIELD CLEANUP PROGRAM APPLICATION**

ATTACHMENT 3

**Background
Purpose
Scope of Work and
Estimated Project Schedule**

ATTACHMENT 3

BACKGROUND

Delphi Automotive Systems, LLC (Delphi) owns and operates an automotive component manufacturing complex in Lockport, New York. The complex consists of three plants located in Building 7, Building 8 and Building 9, engineering and testing facilities located in Building 6 and Building 10 which is currently being converted to house new manufacturing operations staffed by non-Delphi in the northern portion and the southern portion is used as a warehouse (see Attachment 2, Figure 1).

Building 6 Tank Area (see Attachment 2, Figure 2), the focus of this Brownfield Cleanup (BCP) application, is located along the western exterior of Building 6, which is used primarily as engineering and testing facility. The Building 6 Tank Area consists of 6 underground storage tanks used to store automotive fuels. The total capacity of the USTs is approximately 29,500-gallons. Delphi is planning on removing the USTs in this area in 2008 or 2009 and replacing them with above ground storage tanks (ASTs) in the general vicinity.

In 2006, Delphi completed a site-wide Current Conditions Summary and Field Investigation Report (Study) in order to identify areas of soil and/or groundwater contamination throughout the Lockport Complex. Elevated levels of petroleum compounds were detected in two groundwater samples collected from two of six groundwater monitoring wells located around the USTs located within the Building 6 Tank Area at concentrations above New York State Groundwater Quality regulations (see Figure 1 and Summary Table in Attachment 4 for locations and analytical results, respectively).

PURPOSE

The purpose of this project is to address the concerns associated with petroleum contamination detected in the subsurface groundwater in the vicinity of the Building 6 Tank Area. Delphi would like to conduct further investigation to determine the extent of the petroleum contamination and address the contamination in the vicinity of the USTs, when they are removed as part of a fuel storage upgrade project. This may include the removal of impacted soil and groundwater from the UST removal excavations and applying an in-situ technology to assist with the remedial efforts while the UST removal excavation is open.

SCOPE OF WORK

This project will further delineate and remediate the soil and/or groundwater in the vicinity of the Building 6 Tank Area impacted with petroleum contamination.

Field activities associated with the additional delineation will include the collection of soil and groundwater samples for analysis for petroleum compounds. Based on the findings during the delineation and during the UST removal, a remedial strategy acceptable to the NYSDEC will be developed to address the petroleum contamination.

ATTACHMENT 3

ESTIMATED PROJECT SCHEDULE

Submittal of BCP Application:	November 15, 2007
Submittal of Investigation Work Plan:	May 2008
Perform Investigation:	August 2008
Submittal of Investigation Report:	November 2008
Submittal of Remedial Strategy Report:	February 2009

**DELPHI AUTOMOTIVE –BUILDING 6 TAK AREA
LOCKPORT COMPLEX**

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
BROWNFIELD CLEANUP PROGRAM APPLICATION**

ATTACHMENT 4

Previous Reports

**Summary Table of pertinent data and Figure from Delphi Lockport, 2006 Site Wide
Investigation pertaining to Building 6.**

ATTACHMENT 4

PREVIOUS ENVIRONMENTAL REPORTS

In 2006 Delphi conducted a voluntary facility-wide investigation of soil and groundwater conditions at their Lockport facility. (This was done at most of the Delphi manufacturing facilities in the United States.) The first phase of that work was the development of a Current Conditions Summary (CCS). The purpose was to obtain information about potential environmental liabilities because that knowledge was needed by Delphi and potential investors as part of developing the strategy for exiting bankruptcy. The CCS work generally followed the requirements for a CCS in the RCRA Corrective Action Program and we believe it was as comprehensive as any initial BCP or State Superfund investigation would be.

After completion of the CCS, a field investigation was initiated to assess soil and groundwater conditions at each area of interest (AOI), identified by the CCS. A total of 144 soil borings were completed, and nine sediment and four surface soil samples were collected. Six monitoring wells were installed, but only five were sampled as one of the wells was dry. Over 400 soil and groundwater samples were analyzed for an extensive list of parameters. The field investigation activities and results were described in the Field Investigation Report (FIR). The FIR was submitted to the Department's Region 9 office in January 2007, followed by the CCS submission in May 2007.

One AOI is located within the footprint of the Building 6 Tank Farm BCP site were included in the field investigation. AOI-6 was associated with petroleum compounds detected in the groundwater samples collected from MW-6-F-1 and MW-6-F-5, two of six monitoring wells around the USTs associated with the Building 6 Tank Area (see Figure 12 in Attachment 4). At AOI-6, groundwater samples were analyzed for VOCs, SVOCs, PCBs, and metals. VOCs were detected at concentrations above NYSDEC Class GA criteria in the sample collected from MW-6-F-1 and VOCs, SVOCs and metal were detected at concentrations above the NYSDEC Class GA criteria in the sample collected from MW-6-F-5 (see Summary Table in Attachment 4). Four other AOIs were investigated at Building 6 by completing a total of 11 soil probes. Sample results exceeding commercial or industrial SCOs are reported on Figure 12.

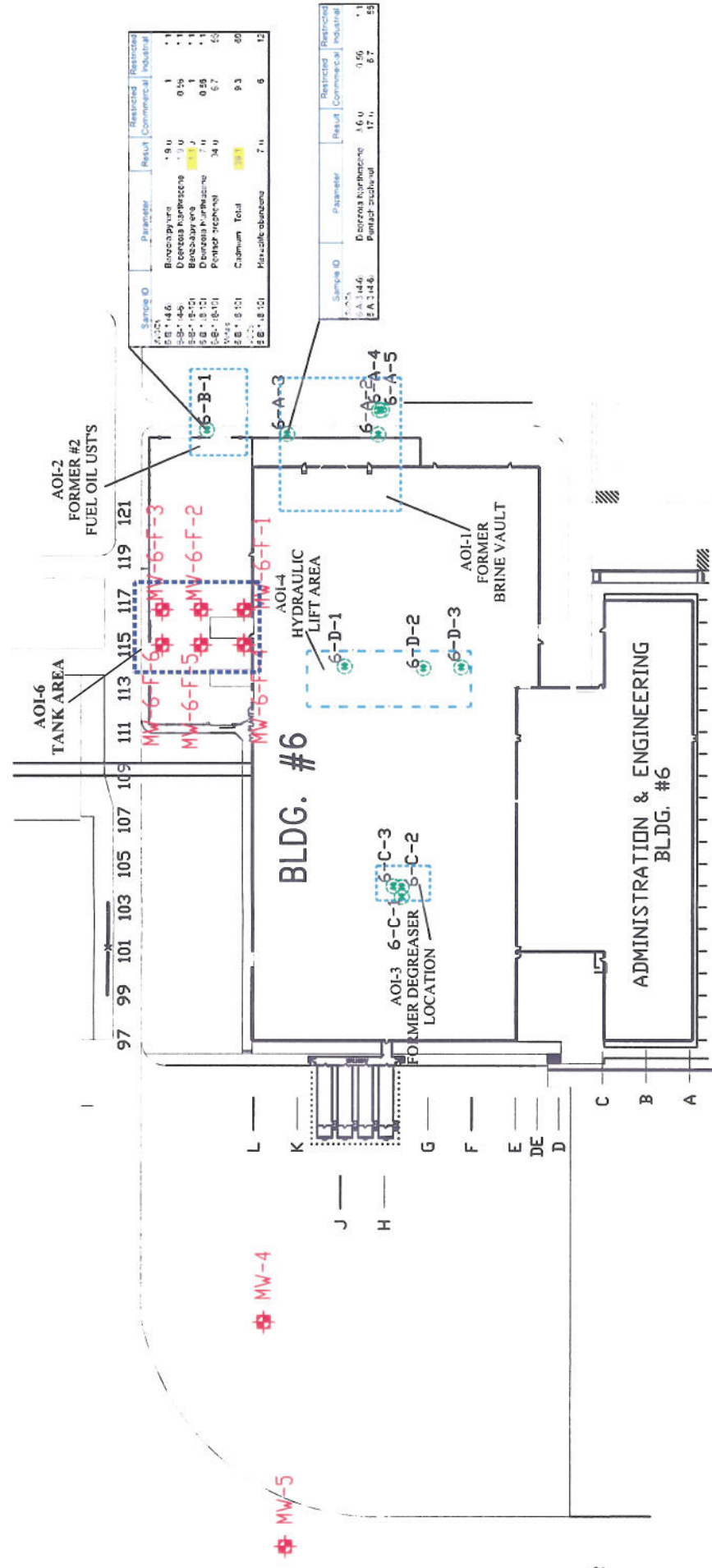
Additional investigations will be conducted to determine the extent of the contamination present and remedial efforts will be implemented based on the findings of the additional investigation.

Summary Table
Groundwater Sample Analytical Results
Delphi Automotive Systems
Lockport Complex
2006 Site Wide Investigation
Lockport, New York
Building 6 Brownfield Cleanup Program Application

Sample Location	NYSDEC Class GA criteria	MW-6-F-1		MW-6-F-5	
			Q		
Volatile Organics via EPA Method 8260 (ug/l)					
Acetone	50	39		20	
Methyl tert-butyl ether	10	10		6,000	D
Methylcyclohexane	NV	33		12	
Benzene	1	33		800	D
2-Butanone	NV	5.5		11	
Toluene	5	23		1,200	D
Cyclohexane	NV			31	
Isopropylbenzene	5	91		130	D
Ethylbenzene	5	1,500	D	3,800	D
Total xylene	5	7,400	D	14,000	D
Semi-Volatile Organics via EPA Method 8270 (ug/l)					
2-Methylphenol	NV			8	J
4-Methylphenol	NV			59	
2,4-Dimethylphenol	50			210	D
Naphthalene	10			1,300	D
2-Methylnaphthalene	NV			320	D
Acenaphthene	20			4	J
Phenanthrene	50			2	J
Fluoranthene	50			0.5	J
Di-n-octylphthalate	50			0.6	BJ
PCB via EPA Method 8082 (ug/l)					
		NT			
Inorganics via EPA Method 6010/ (ug/l)					
Arsenic	12	40			
Barium	180	510			
Calcium	NV	115,000			
Copper	200	650			
Iron	300	22,400			
Lead	25	58			
Magnesium	35,000	14,200			
Manganese	300	570			
Nickel	100	37			
Potassium	NV	7,900			
Sodium	20,000	512,000			
Zinc	2,000	420			

Notes:

1. Only compounds detected in one or more of the samples are presented in this table.
2. Blank indicates compound was not detected.
3. NT indicates compound was not tested.
4. Q = laboratory qualifier; J = estimate concentration; D = diluted sample result;
B = compound was detected in the blank.
5. mg/kg = parts per million
6. NYSDEC Class GA criteria from NYSDEC Division of Water, Technical and Operational Guidance Series (TOGS 1.1.1), dated October 1993, revised June 1998, January 1999 errata sheet and April 2000 addendum.
7. Concentrations that are shaded exceed NYSDEC Class GA criteria



Sample ID	Parameter	Result	Restricted	Commercial	Industrial
EA-1-M-6	Benzene	1.8 U	1	1	1
EA-1-M-6	Dibenz(a,h)anthracene	0.59	0.59	1	1
EA-1-M-6	Benzo(a)pyrene	0.57	0.57	1	1
EA-1-M-6	Dibenz(a,h)anthracene	0.59	0.59	1	1
EA-1-M-6	Fluoranthene	7.1	7.1	6.7	6.7
EA-1-M-6	Pyrene	3.4	3.4	3.4	3.4
EA-1-M-6	Cadmium Total	0.33	0.33	0.33	0.33
EA-1-M-6	Hexachlorobenzene	7.1	6	6	6
EA-1-M-6					

Sample ID	Parameter	Result	Restricted	Commercial	Industrial
EA-1-M-6	Dibenz(a,h)anthracene	0.6 U	0.56	1	1
EA-1-M-6	Perfluorobenzene	17.1	17.1	17.1	17.1

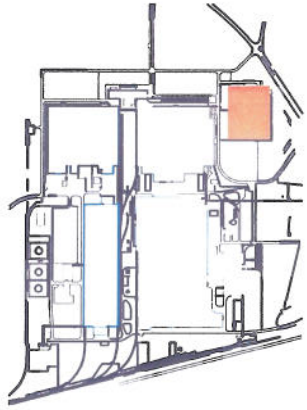


FIGURE 12 - 2006 FIELD INVESTIGATION
 LOCKPORT, NY
 ANALYTICAL RESULTS
 BUILDING 6

NOTES:
 RESULTS ARE IN MG/KG
 U - INDICATES COMPOUND WAS ANALYZED FOR, BUT NOT DETECTED AT OR ABOVE REPORTING LIMIT.
 100% - ALL RESULTS REPORTED AS A "NONDETECT" THAT HAVE A REPORTING LIMIT 25% ABOVE THE UNRESTRICTED CRITERIA ARE SHOWN
 B - INDICATES THAT THE ANALYTE WAS FOUND IN THE ASSOCIATED BLANK, AS WELL AS IN THE SAMPLE
 I - INDICATES AN ESTIMATED VALUE
 D - INDICATES COMPOUNDS IDENTIFIED IN AN ANALYSIS AT A SECONDARY DILUTION FACTOR

FIGURE 12 MODIFIED WITH PERMISSION FROM BASI. MAP PROVIDED BY DELPHI INTERNAL

**DELPHI AUTOMOTIVE –BUILDING 6 TANK AREA
LOCKPORT COMPLEX**

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
BROWNFIELD CLEANUP PROGRAM APPLICATION**

ATTACHMENT 5

Previous Owners & Occupants

ATTACHMENT 5

PREVIOUS OWNER/OCCUPANT INFORMATION

Building 6 was owned and operated by General Motors Corporation (GM) until it was conveyed to Delphi in December 1998 as part of the creation of Delphi Automotive Systems, LLC and GM's spin-off of the Delphi operations. Delphi is no longer affiliated with GM, though GM remains one of Delphi's largest customers. Prior to development by GM, the land was vacant/agricultural.

General Motors Corporation
100 Renaissance Center
Detroit, MI 48243-1114
313-556-5000

**DELPHI AUTOMOTIVE –BUILDING 6 TANK AREA
LOCKPORT COMPLEX**

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
BROWNFIELD CLEANUP PROGRAM APPLICATION**

ATTACHMENT 6

Contact List

ATTACHMENT 6

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Glenn May
270 Michigan Avenue
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NEW YORK STATE DEPARTMENT OF HEALTH

Matthew Forcucci
584 Delaware Avenue
Buffalo, NY 14202

NIAGARA COUNTY

William Ross
Niagara County Legislative Chairman
175 Hawley Street
Lockport, NY 14094

County Manager
59 Park Avenue
Lockport, NY 14094

CITY OF LOCKPORT

Michael Tucker
Mayor
One Locks Plaza
Lockport, NY 14094

Richard Blackey
Zoning Board Chairperson
49 Gaffney Road
Lockport, NY 14094

Michael Diel
Director of Public Utilities
611 West Jackson Street
Lockport, NY 14094

ATTACHMENT 6

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TOWN OF LOCKPORT

Marc Smith
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6560 Dysinger Road
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Paul Siejak
Zoning Board of Appeals Chairman
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Lockport, NY 14094

Richard Forsey
Town Planning & Zoning Board
6200 Robinson Road
Lockport, NY 14094

Lewis Staley
Town of Lockport IDA
Dysinger Road
Lockport, NY 14094

ADJACENT PROPERTIES

Town of Lockport IDA
1010 Upper Mountain Road
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Polycom-Huntsman Inc.
4921 IDA Park Drive
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GLS Leasco Inc.
4929 IDA Park Drive
Lockport, NY 14094

Lockport Energy Association LP
5077 R Junction Road
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Elaine Laubacken
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5626 Saunders Settlement LLC
5610 Old Saunders Settlement Road
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5626 Saunders Settlement LLC
5620 Old Saunders Settlement Road
Lockport, NY 14094

5626 Saunders Settlement LLC
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Gerald Wagner
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Lockport, NY 14094

James Wasik
1050 Junction Road
Lockport, NY 14094

Miron Wasik
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Lockport, NY 14094

Central Transport Inc.
4928 IDA Park Drive
Lockport, NY 14094

LOCAL NEW MEDIA

Buffalo News
One News Plaza
PO Box 100
Buffalo, NY 14240

LCTV
293 Niagara Street
Lockport, NY 14094

Lockport Union Sun & Journal
170 East Avenue
Lockport, NY 14094

WLVL 1340 AM
320 Michigan Street
Lockport, NY 14094

ATTACHMENT 6

CONTACT LIST

PUBLIC WATER SUPPLY

Michael Diel
Director of Public Utilities
611 West Jackson Street
Lockport, NY 14094

SCHOOLS & DAY CARES

No schools or day cares are located within a ¼ mile radius of the Site.

DOCUMENT REPOSITORY

Lockport Public Library
23 East Avenue
Lockport, NY 14094
(see attached acceptance correspondence)

DELPHI

Energy & Chassis Systems

September 11, 2007

Claire McDonough
Reference Librarian
Lockport Public Library
23 East Avenue
Lockport, NY 14094

RE: Document Repository for Delphi Brownfield Cleanup Program

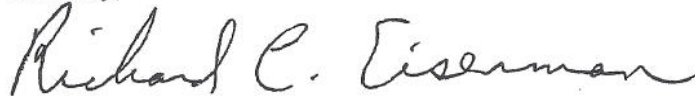
Dear Ms. McDonough:

Following our phone call of September 10, 2007, this letter confirms your willingness to have the Lockport Public Library serve as the repository for documents generated under a Brownfield Cleanup Program agreement at the Delphi Lockport site. The repository is a requirement of the NYS Department of Environmental Conservation and will eventually include work plans, investigation reports, fact sheets, etc.

Please plan on maintaining the repository for approximately three years. However, regulations require that a repository be maintained until a final remedy is implemented, and remedial program timelines are difficult to estimate because of unanticipated problems. Please contact us before you discard any documents.

Thank you for your assistance. If you have any questions please call me at (585) 647-4766.

Sincerely,



Richard C. Eisenman
Senior Environmental Engineer

**DELPHI AUTOMOTIVE –BUILDING 6 TANK AREA
LOCKPORT COMPLEX**

**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
BROWNFIELD CLEANUP PROGRAM APPLICATION**

ATTACHMENT 7

Description of Surrounding Area Site Geography Geology and Hydrogeology

ATTACHMENT 7

SURROUNDING AREA DESCRIPTION

The Delphi Automotive Lockport Complex (Delphi) is located at 200 Upper Mountain Road in both the City and Town of Lockport, which is located in Niagara County, New York. The portion of the facility including Building 6 is located within both the City and Town of Lockport. Lockport is bordered by the Town of Newfane to the north, the Town of Hartland to the northeast, the Town of Royalton to the east, the Town of Pendleton to the south, and the Town of Cambria to the west. Figure 1 in Attachment 1 shows the approximate location of Delphi and the surrounding areas.

Delphi is located in an area of mixed residential, agricultural, commercial, and industrial settings along Route 93. Across Route 93, the Niagara Escarpment is located approximately one-half mile to the northeast. A stone quarry and former steel facility are located approximately 1 mile south of Delphi. Residential properties are generally present along the east and north sides of Route 93 and to the west.

GROUNDWATER VULNERABILITY

Groundwater flow at Delphi is in the upper bedrock unit, which has a flow direction to be in an easterly direction. Petroleum compounds have been detected in two groundwater samples collected from two of the six monitoring wells around the USTs located in the Building 6 Tank Area at concentrations above NYSDEC Class GA criteria (see Summary Table in Attachment 4, Previous Reports). This location is approximately 500 feet from the downgradient property line. Groundwater flows from the Building 6 Tank Area easterly under Building 6.

The Site and surrounding area are supplied by public water provided by the City of Lockport. Water for public supply is drawn from the Niagara River. No wellhead protection or groundwater recharge areas are located within the vicinity.

GEOGRAPHY

The City of Lockport has a total area of approximately 8.6 square miles of which 8.5 square miles is land and 0.1 square miles is water. Lockport is located in the center of Niagara County approximately 18 miles east of Niagara Falls and 30 miles northeast of Buffalo.

The Erie Canal passes through the center of Lockport, approximately 1¼ miles southeast of the Site, turning south toward Tonawanda Creek. Lockport is at the junction of several major trunk roads, including NY Route 78 (North Transit Road), New York State Route 31, and New York State Route 77.

The naturally existing topography in the vicinity of the Site is generally flat. The primary surface relief in the area is the Niagara Escarpment, located approximately one mile to the north. There is an approximate 200-foot difference in elevation from the ground surface

ATTACHMENT 7

elevation at the Site to the foot of the escarpment. This escarpment acts as a surface water and groundwater divide.

As of the 2000 census, there were 22,279 people, 9,459 households, and 5,609 families residing in the City of Lockport. The racial makeup of the city is reported to be 91.04% White, 5.78% Black or African American, 0.47% Native American, 0.48% Asian, 0.01% Pacific Islander, 0.50% from other races, and 1.72% from two or more races. Hispanic or Latino of any race were 2.06% of the population.

GEOLOGY

Subsurface soil conditions in the vicinity of the Building 6 Tanks Area (outside the tank placement area) likely consist of approximately 3 to 5 feet of fill material overlaying native soils (fine grained silts and clays with lesser and varying amounts of sand and gravel). Bedrock is likely at a depth of approximately 10 feet below ground surface.

Regionally, the stratigraphy from ground surface consists of glacially derived soils comprised of lacustrine clays and silts which overlay bedrock. The upper-most bedrock unit is the Lockport Group, which consists of the Gasport Limestone Formation and the Lockport Dolomite. The Gasport Limestone was not observed in borings completed at the Site. Below the Lockport Group is the Clinton Group, which consists of the Rochester Shale Formation, the Irondequoit Limestone Formation, and the Rockway/Hickory Corners/Neahga Formation. This formation consists of dolostone, limestone, and shale units. Below the Rockway/Hickory Corners/Neahga Formation is the Medina Group, which consists of the Grisby Sandstone Formation, the Power Glen Shale Formation, and the Whirlpool Sandstone Formation. The Lockport, Clinton, and Medina groups are Middle to Lower Silurian in age and were deposited from 410 to 430 million years ago.

Bedrock in Western New York dips to the south to southwest at a slope of about 40 feet per mile. The rock bedding is considered essentially flat over short distances. High angle to vertical joints are common to the rock.

Bedrock underlying Building 6 is the Lockport Dolomite Formation. Beneath the Lockport Dolomite is the Rochester Shale Formation. The Lockport Dolomite is gray dolomitic limestone, which is hard and fine-grained with horizontal to low angle fractures.

GROUNDWATER

Six groundwater monitoring wells are installed around the USTs located in the Building 6 Tank Area and numerous monitoring wells exist throughout the Delphi Lockport Complex. Water level in the six monitoring wells around the Building 6 Tank Area are about 3 feet below ground surface. Groundwater flow direction is likely in an easterly direction, consistent with flow direction measured at other locations throughout the Delphi Lockport Complex.

ATTACHMENT 7

Regionally, the bedrock groundwater flow direction is affected by the east-west trending Niagara Escarpment, which is located approximately 0.5 mile north of the Lockport Complex. The Erie Canal is approximately 1¼ mile to the southeast and has a southwest-northeast trend in the vicinity of the City of Lockport. Bedrock groundwater flow in the area is also affected by the orientation of bedrock fracture patterns and the size of the fractures.