

**RCRA CORRECTIVE ACTION CURRENT CONDITIONS  
SUMMARY**

**DELPHI CORPORATION**

**DELPHI THERMAL  
WEST LOCKPORT COMPLEX**

**LOCKPORT, NEW YORK**

**US EPA ID #NYD002126852**

*Privileged and Confidential*

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**for**

**Delphi Corporation**

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## 1.0 INTRODUCTION

This Current Conditions Summary (CCS) was requested by Delphi for site assessment and investigation services and other assistance for eventual purchase, merger, lease, closure, demolition, or sale of the facility and/or property.

The current environmental conditions at the Delphi Corporation's West Lockport Complex ("Facility") were assessed by reviewing Facility and regulatory agency files; interviewing site personnel; reviewing historic aerial photographs; and observing and documenting current conditions through several site visits. Through this process we identified 50 areas where past treatment, storage or disposal (or release) of hazardous waste or hazardous constituents, hazardous substances or petroleum products is known or probable to have occurred. These areas are identified as Areas of Interest (AOIs).

AOIs where a release of hazardous waste or hazardous constituents, hazardous substances or petroleum products was known or is probable are recommended for further investigation under the Sub-Surface Phase II Investigation, unless existing documentation does not warrant further subsurface investigation. This information is summarized in the enclosed matrix of AOIs and corresponding figures (Table 1 and Figures 3 through 6).

## 2.0 FACILITY BACKGROUND

Delphi Corporation's West Lockport Complex is located at 200 Upper Mountain Road in the City and Town of Lockport, Niagara County, New York (the "Site") (Figure 1). The developed area of the Delphi property is located on an annex to the City of Lockport and a portion of Building 6 as well as the wastewater treatment plant (WWTP) is located within the Town of Lockport. The Site is approximately 511 acres with approximately 3.2 million square feet of building space. The Facility includes three manufacturing buildings (Buildings 7, 8, and 9), one warehouse/distribution center (Building 10) that housed some manufacturing operations in the past, four office and engineering buildings (Buildings 6, 7A, 8A, and 9A), several support buildings, and a wastewater treatment plant (WWTP).

The Site currently operates as Delphi Thermal Division of Delphi Corporation. Site operations currently include the manufacture and assembly of components for automotive heating and cooling systems (engine cooling systems and HVAC systems).

Current production activities at the Site are:

- Form Metal (stamping, tube forming)
- Assembly (hand assembly, automated stackers)
- Cleaning (aqueous wash, thermal degrease, vacuum degrease)
- Joining (flux / COB braze, vacuum braze, induction braze, welding)
- Testing and Repair (hydrostatic, mass spec., weld, induction braze)
- Painting and Packing (paint)

Past Production activity at the Site also included:

- Chromate-Conversion Coating
- Solvent Degreasing
- Lead Soldering
- Zincate Plating
- Coal Fired Boiler for Steam Generation

The Facility purchases water from the City of Lockport, with backup supply occasionally provided by Niagara County. Sanitary sewage and process water at the Facility is discharged to the City of Lockport sewer and Publicly Owned Treatment Works system. Storm water at the Facility is discharged under a state SPDES permit to the Gulf, a tributary to 18 Mile Creek.

The EPA Generator ID Number for the Site is NYD002126852. The Facility currently operates as a "Large Quantity Generator" of hazardous waste, generating more than 2,200 pounds per month. Presently, the hazardous waste streams generated at the Site include: metals from brazing activities, ignitable solvents and paints from the painting process, and petroleum distillates from vehicle testing operations.

### **3.0 AREAS OF INTEREST**

Areas of Interest (AOI) are defined as areas associated with the Facility where evidence of past treatment, storage or disposal (or release) of hazardous waste or hazardous constituents, hazardous substances or petroleum products is known or probable to have occurred.

#### 4.0 INFORMATION REVIEWED

To identify AOIs, Environmental Resources Management (ERM) reviewed Delphi's records of spills and releases, environmental sampling data, process descriptions and diagrams, and Site and Facility figures, historical areas, and an environmental database search (two-mile radius). Additionally, aerial maps from the years 2001, 1995, 1990, 1977, 1966, 1958, and 1951 were reviewed at the Soil and Water Conservation District to identify potential environmental issues.

The Facilities and Environmental Manager and a Senior Environmental Engineer were interviewed and several site visits were conducted. Additional information on historical operations was also provided by several other Delphi personnel. During each site visit, Delphi personnel knowledgeable of current or past operations accompanied ERM representatives.

Material Safety Data Sheets (MSDSs) for chemicals currently used in manufacturing at the Facility will be provided to ERM during the Phase II program and if further review is warranted, findings will be incorporated into the Phase II as appropriate.

Files maintained by New York State Department of Environmental Conservation (NYSDEC) and Niagara County Health Department were accessed through a request submitted under the Freedom of Information Act.

The following documents were provided by Delphi and reviewed to identify potential AOIs and are summarized below:

##### **Building 12 Coal Pile Information**

- Summary Memo, March 1981
- Analyticals Report, October 1994
- NYSERDA Report, June 1981
- Letter, May 1988
- Report, August 1989

##### **NYSDEC 2005 Annual Hazardous Waste Report**

- January 2005 -December 2005

##### **Former Tank Farm Between Buildings 7 and 10**

- Groundwater Monitoring System for Former Tank Farm (Building 7), February 1998
- Manhole west of Bldg. 7, Letter with Analytical Results, July 1988
- GW Well Abandonment Report, November 1995

- GW MW Correspondence, September 1995

### **Metals**

- Interoffice Telecommunications~ Chrome Sump Line 4 Soil Test Results
- Figure, Building. 8 Chrome Sumps and Piping
- Diagram, Existing Chrome Sump Removal for Line 4, June 1992
- List of WLC Chrome Sump Information
- Email of Chrome Line Break, March 2002
- Email of Chrome Line Break (east of cooling tower #7-1) Monitoring Procedures, February 2002
- Hex Chrome Diagram
- Pictures Line 4 Chrome Sump Removal, June 1992

### **Vapor Intrusion Information**

- Letter Report, Results of Soil Vapor Study in the Area of the Former Degreaser in Building #7 at the Harrison Division Facility, Lockport, November 1992
- Draft Vapor Intrusion Investigation Building. 6, Lockport, NY July, 2006

### **Degreaser Information**

- Memo, Summary of Historical Chlorinated Solvent Use and Storage at the West Lockport Complex, September 1995
- Two Figures, Indicating Former and Current Locations of Degreasers in Buildings 7 and 8, October 1990, December 1986
- Memo, Underground Tanks- West Side of Building 7, March 1981
- Notice/Memo of Solvent Degreasers West Lockport Complex Summary Supplement to P.E Spec. #1121
- Hand Notes, October 1981
- Analyticals, July 1989
- Summary of Solvent Degreasers-West Lockport Complex, January 1987

### **Underground and Aboveground Storage Tanks**

- Letter Report, Document Verification for Closure of Tank #18-39, October 1990
- Letter Placement 20,000 gallon steel AST for #2 Fuel Oil building 9 Boiler House -1990
- Notes on Removal of Previously Closed UST From Area on the Northeast Corner of Building 7- April 1996
- Letter, Update on Underground Tank Closure and Tightness Testing, July 1984
- Letter, Harrison Division, GMC Tank # 7-10 Closure Documentation, October 1991
- Letter, Document Verification for Closure of Tank #18-40 (2000 gal. diesel), July 1990
- Letter/Proposal, Tank Installation Project Building 12, November 1986
- Letter Report, Groundwater Sampling Round, Petroleum Storage Tanks, May 2006
- Hand Written Tank Closure Table - For 3/12/85 Memo - 2-22-85
- Installation of an Observation Well, for Building 9 Underground Fuel Oil Storage Tanks, February 1988

### PCB Information

- PCB Cleanup Activity Report, November 1998
- Letter, PCB Cleanup Project January/1999, DEC has no further comments
- Letter, PCB Cleanup Summary Report NYS #9803091
- Report, Follow-up Report to Informational Notification to National Response Center  
July 1998
- Email & Analytical Report, Re: Lab Results: Oil in Floor Crack Near Die Rack 171 Dept.  
481, June 2002
- Letter, Re: PCB Cleanup Activity Report, NYS #980391, November 1998
- Analytical Report VOC & PCBs, June 1998
- Analytical Report, Yard and Building. 7 North, PCB's & VOC's, June 1998
- Analytical Report, Pumphouse #1 PCB and VOC Results, June 1998
- Table, Delphi PCB Transformer History, August 2000

### Spill/Release Information

- WWTP-Sulfuric Acid Release, NYSDEC Spill #0202910
- WWTP-Sulfuric Acid Release, NYSDEC Spill #0475254
- Underground Wastewater Pipeline Leak -Hexavalent Chrome
- Chlorinated Solvents-Loading Dock WW4 Dock at Building 7, NYSDEC Spill #0485413
- Building 7 Press Foundation Removal, NYSDEC Spill # 0375453
- Building 8 Scrap Dock-NYSDEC Spill # 0475299
- Building 8 Oil Fire

### Drawings

- Site Plan for SPCC, FRP, CBS Programs - PLT-00911
- WLC Underground Chrome Leak - 11/15/2005 - PLT-00922
- Annotated Harrison Division West Lockport Complex Site Plan- Storage Tanks -  
Removed, closed in place, etc.
- Roy Notes Annotated Harrison Division West Lockport Complex Site Plan- WWTP  
Sludge & Sewers
- New Sump for Degreaser - Dept 868, Plant 4 (M-417)
- New Sump for Degreaser - Dept 468, Plant 2 (M-437) - 1981
- Trichlor Separation Sump for Degreasers - Dept 455, Building 7, Plant 2 (M-438) - 1981
- Trichlor Separation Sump for Degreaser - Dept 465, Building 7, Plant 2 (M-439) - 1981;  
Ref: DL-2-2752
- 1-inch Condenser First Wash/Dry System - General Layout - Module 1, Building 8 (S-  
1069, sheet 1 of 2) - 3-14-86
- 1-inch Condenser First Wash/Dry System - General Layout - Module 1, Building 8 (S-  
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- Chrome Pumps and Piping for 1" Condenser Wash/Dry System #2, Building 8 (S-1068, sheet 1 of 1)
- 1-inch Condenser First Wash/Dry System - General Layout - Building 8 (S-1024, sheet 1 of 2) - 9-18-85
- 1-inch Condenser First Wash/Dry System - Detail - Building 8 (S-1024, sheet 2 of 2) - 9-18-85
- Piping and Pumps for No. 8 Chrome Sump, Building 8 - Plant 4 (M-234, sheet 1 of 2)
- Chrome Sump No. 7 General Location, Building 8, PLT-4, P.Z. #89-69-8 (M-126, sheet 1 of 4)
- Chrome Sump No. 7 General Location, Building 8, PLT-4, P.Z. #89-69-8 (M-126, sheet 2 of 4)
- Chrome Sump No. 7 General Location, Building 8, PLT-4, P.Z. #89-69-8 (M-126, sheet 3 of 4)
- Waste Treatment: Chrome Collection Sump & Piping Details - Exist Building No. 7 and No. 8, HRD S-296B, SHT-4, Sheet No. WT-105, Job 1921
- Waste Treatment: Chrome Collection Sump & Piping Details - Exist. Building No. 7, HRD S-296B, SHT-5, Sheet No. WT-104, Job 1921
- Waste Treatment: Chrome Collection Sump & Piping Details - Exist. Building No. 8, HRD S-296B, SHT-6, Sheet No. WT-106, Job 1921
- Waste Treatment: Chrome Collection Sump & Piping Details - Exist. Building No. 8, HRD S-296B, Sheet WT-107, Job 1921
- MM53 PCB Sampling Locations - July 1998
- Building 6 Degreaser Containment Memo & Drawing - 8-17-87
- Degreaser Locations Plot Plan - 10-14-82
- Mark-up Showing D-400 Degreaser Location (M-27) - 5-7-90
- Building 6 Brine Vault Sump Location & Elevation (Job 1821 #63) - 3-8-67
- Brine Vault Elevation View (Job 1821 #64) - 2-18-66
- Building 6 Soil Boring Location - Extract (Job 1821 SB-1) - 9-12-65
- Building 6 Boring B-24 - Brine Vault (Job 1821 SB-3) - 9-26-66
- Building 6 Former 20,000-Gallon Fuel Oil USTs (Job 1821 MH28) - 2-24-66
- Building 6 Fuel USTs - Monitoring Wells (M-501) 7-17-85
- Building 6 Hoists Plans and Details (1821 - 20, 21, 54)
- Building 7SE Gasoline UST 7-10 (M-161) 2-17-70
- Building 7N Oil Drum Storage Containment 51-56 (PLT 01480) - 6-2-95
- Building 7 Former D-461 Degreaser Soil Vapor Points- November 1992
- Mark-up Showing Historical Tank Locations (PLT-00911) - 8-23-06
- Location of Potential Pollutant Materials - 7-13-83
- Gasoline USTs - Historical 8-3 & 10-2 (ME-M-7) - 7-26-61
- Former Location of Gasoline UST Building 7N Ramp (Job 3660 M-1) - 5-27-73
- Building 8, former 20,000-Gallon Fuel Oil USTs - 8-2 (Job M-248) - 4-20-72
- Pumphouse #2 Soilds Separator (4854 WT-3) 11-9-78
- Building 8N "Paint" USTs (M-66) 11-11-66
- Building 8N "Paint" USTs (M-68, 1 & 4) 11-11-67



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- Building 8N 3,500-Gallon Former Paint Dump Tank (2060 M-1) 7-7-66
- Building 8 N Excavation of Former Paint Dump Tank (PLT-02225, Sheet 1)
- Building 9 20,000 gallon Former Fuel Oil USTs (2665 M-3) 5-16-69
- Building 9 20,000 Gallon AST Containment (S-1321) 1-16-91
- Building 9 Gasoline UST (Tank 9-3) 2-13-70
- Building 10 South Gasoline UST (M-162) 11-25-65
- Building 10 Former Gasoline UST-South End (2667, 2) 5-16-69
- Building 10 D-080 Paint System Spill Containment (PLT-01068 S1) 12-16-91
- Building 18 USTs 18-39 and 18-40 (3152P-1) 1-7-72
- Marked-up SPCC Inactive Tanks Table - July 2006
- Surplus Storage Building Foundation (M-368) June 1977
- Drawing with Sewer Laterals
- Underground Plumbing Outside, Addition to Manufacturing Building (Job 8254) 12-8-52
- Plot Plan- Addition to Manufacturing Building (Job 8254, Sheet 1-A) 10-26-54
- New Manufacturing & Warehouse Buildings, Mechanical Work - Plot Plans & Details (Job 9406, Sheet M-1) 11-15-58
- Plot Plan- Addition to Manufacturing Building, Plant Expansion Program (Job 5367, Sheet 1) 6-8-45

## 5.0 SELECTION CRITERIA FOR AOIS REQUIRING ADDITIONAL INVESTIGATION

As stated above, AOIs are areas associated with the Facility where evidence of past treatment, storage or disposal of hazardous waste or hazardous constituents, hazardous substances or petroleum products is known or probable to have occurred. The identification of AOIs retained for further investigation was based on the following:

1. Areas with a confirmed release to the environment.
2. Areas with a probable release based on visual evidence or interview with knowledgeable personnel.
3. Area where a release to the environment is possible because a release pathway could not be ruled out. For example, where highly corrosive materials were used and impact of water discharging into sumps or trenches may have resulted in degradation of the integrity of that system and no evidence to the contrary was available, such systems were considered Areas of Interest warranting further investigation.
4. Areas with the likely presence of free product, regardless of its composition.

AOIs were eliminated from further investigation based on the following:

1. Areas where no hazardous waste or hazardous constituents were reportedly managed.
2. Areas where no release pathway to the environment was identified or no evidence of release was observed, documented, reported, or suspected.
3. Areas where, based on the volumes of materials managed, the potential for release was considered de minimus.

Further investigation conducted under the Sub-Surface Phase II Investigation will include the collection and analysis of soil and/or groundwater samples from certain areas.

## 6.0 CONCLUSIONS

AOIs have been identified by reviewing Delphi records, observing site conditions, and interviewing Delphi personnel with knowledge of current and historic Facility operations. Further investigation is recommended.

## 7.0 FACILITY CLOSURE REQUIREMENTS

### Closure Requirements and Regulations

The following paragraphs in this section provide a brief discussion of local, county, and state requirements including environmental regulations that may apply to the Lockport facility in the event of a cessation of operations.

Specific requirements and regulations govern closure requirements based on facility status and type of operations conducted at the site. The Lockport facility currently operates under the following environmental permits and/or registrations under the following programs:

- Large Quantify Generator (as defined by RCRA)
- Title V Air Permit
- State Pollution Discharge Elimination System (SPDES)
- Major Oil Storage Facility (MOSF)
- Solid Waste Transporter
- Petroleum Bulk Storage Tanks (PBS)
- Chemical Bulk Storage\* (CBS)
- City of Lockport POTW Industrial Wastewater Permit

Note\* - The Lockport facility is in the process of closing the last CBS tank.

During a cessation of operations, the above permits/registrations will need to be closed and thus, will require specific tasks to be completed prior to site closure and after site closure (post closure).

**Large Quantity Generator (LQG) requirements:**

The Lockport facility does not operate under a RCRA permit state permit; thus, does not store hazardous waste longer than 90 days. Closure requirements for facilities with an LQG status are found at the federal and state level. Under the federal regulations, closure requirements are governed under 40 CFR §265.111, Closure Performance Standard and requirements of [§§265.197](#), [265.228](#), [265.258](#), [265.280](#), [265.310](#), [265.351](#), [265.381](#), [265.404](#), and [265.1102](#); however, New York governs the management of hazardous waste by large quantity generators under the Part 372 regulations. More detailed requirements for permitted / interim status treatment, storage and / or disposal units are found in Part 373 of the NYS 6 NYCRR.

ERM understands that this facility is a large quantity generator of hazardous waste, and therefore the closure requirements stem from the Part 372 requirements. A summary of the requirements for such closure under Part 372 is provided below.

Part 372 requires LQG to manage hazardous waste in accordance with several provisions, including [373-1.1\(d\)\(1\)\(iii\)](#), (iv), (xix) and (xx).

[373-1.1\(d\)\(1\)\(iii\)](#) sets forth the basic management standards for less than 90-day hazardous waste container storage areas, and references that such areas must comply with 373-3.7(b) (closure performance standards) and (e) (disposal / decontamination of equipment).

[373-1.1\(d\)\(1\)\(xix\)](#) – sets forth the management standards for drip pads used for hazardous waste storage, and references that such areas must comply with 373-3.7(b) (closure performance standards) and (e) (disposal / decontamination of equipment).

[373-1.1\(d\)\(1\)\(xx\)](#) sets forth the management standards for containment buildings used for hazardous waste storage, and references that such areas must comply with 373-3.7(b) (closure performance standards) and (e) (disposal / decontamination of equipment).

Therefore, for less than 90-day storage areas, drip pads, and containment buildings, the following closure requirements of 373-3.7(b) and 373-3.7(e) apply:

(b) *Closure performance standard.*

The owner or operator must close the facility in a manner that:

- (b)(1) minimizes the need for further maintenance;
- (b)(2) controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere; and (b)(3) complies with the closure requirements of this Subpart including, but not limited to, the requirements of subdivisions [373-3.10\(h\)](#), [373-3.11\(f\)](#), [373-3.12\(g\)](#), [373-3.13\(g\)](#), [373-3.14\(d\)](#), [373-3.15\(e\)](#), [373-3.16\(e\)](#), [373-3.17\(e\)](#) and [373-3.30\(c\)](#)

(e) *Disposal or decontamination of equipment, structures and soils.*

During the partial and final closure periods, all contaminated equipment, structures and soils must be properly disposed of or decontaminated unless otherwise specified in subdivisions [373-3.10\(h\)](#), [373-3.11\(f\)](#), [373-3.12\(g\)](#), [373-3.13\(g\)](#) and [373-3.14\(d\)](#) of this Subpart. By removing any hazardous wastes or hazardous constituents during partial and final closure, the owner or operator may become a generator of hazardous waste and must handle that waste in accordance with all applicable requirements of [Part 372](#) of this Title

The referenced citations of 373-3.10 through 373-3.30 apply to tank systems, surface impoundments, waste piles, landfills, incinerators, thermal treatment units, chemical, physical and biological treatment units, and containment buildings and outline specific closure requirements.

Note that 6 NYCRR Part 373-1.1(d)(1)(xii) exempts waste non-commercial wastewater treatment units from the NYS hazardous waste regulations, as long as certain requirements pertaining to training, contingency planning, labeling, and management of ignitables are followed. This exemption sets forth no hazardous waste requirements pertaining to closure of such a unit.

### **State Pollutant Discharge Elimination System (SPDES)**

The Clean Water Act storm water discharges associated with industrial activity from a point source to waters of the United States are unlawful, unless authorized by a National Pollutant Discharge Elimination System ("NPDES") permit. In New York, this authorization is accomplished through the administration of the State Pollutant Discharge Elimination System ("SPDES") program. The Lockport facility discharges storm water into the Gulf as a permitted discharge under the SPDES program. In the event of a cessation of operations, the following requirements must be followed per 6 §750-2.11, Closure Requirements for Disposal Systems:

(a) This section applies to any and all disposal systems permanently removed from use or operation at SPDES permitted facilities or at facilities for which a SPDES permit has been revoked or an application for renewal denied, unless a judicial or administrative stay is in effect. The intent of this section is to protect public safety and health and to assure that no contamination of ground or surface water will occur as a result of removing such systems from service either through the act of closure or through continuing the discharge of pollutants into or through equipment; or through leaking, leaching, or discharge of pollutants from wastewater or residuals remaining in disposal systems which has been removed from use but remains on site.

(b) The closure of a disposal system means either the termination of the source of wastewater or stormwater, or the permitted conveyance of wastewater or stormwater to an alternate location (such as a regional facility) in such a manner that no further treatment storage or conveyance of wastewater or storm water is performed by the system.

(c) Disposal system closures shall conform with the following procedures:

(c)(1) On or before 60 calendar days prior to taking the system out of service a permittee shall:

(c)(1)(i) Submit to the Regional Water Engineer the following information concerning closure activities:

(c)(1)(i)(a)' The date the system will cease operation;

(c)(1)(i)(b)' The date the influent and effluent pipes will be sealed;

(c)(1)(i)(c)' Plans (signed and sealed by a New York State licensed professional engineer) for final disposition of the physical facilities, including all treatment units, outfall line, and all mechanical and electrical equipment and piping;

(c)(1)(i)(d)' Plans (signed and sealed by a New York State licensed professional engineer) for elimination of all equipment and/or conditions that could possibly pose a safety hazard, either during or after shut-down of operations;

(c)(1)(i)(e)' Verification that there are no lines in the collection system which are cross connected (receiving both sanitary and storm water) or which do not contain adequate conveyance capacity.

(c)(1)(i)(f)' The name of the licensed individual responsible for the maintenance and operation of the wastewater pumping station and/or disposal system systems that are still to be maintained; and

(c)(1)(ii) Notify the Regional Water Engineer, in writing, concerning any deactivated lagoons or other actual or potential discharges to ground water which may exist at the site.

(c)(2) Proper management and/or removal of all residual materials (collected grit and screenings, scums, sand bed material, and dried or liquid sludges), as well as filter media, and all other solids from the treatment process that may remain in the abandoned treatment works is required.

(c)(2)(i) The permittee shall submit to the Regional Water Engineer proof of ownership of or contractual arrangement with an operation or operations permitted to manage all such waste materials. A contract with a hauler will only be accepted as proof of proper waste management if documentation of management at an approved site or sites is included. In addition, all necessary State or Federal permits/approvals must accompany the submission.

(c)(2)(ii) All residual material shall be removed within 180 calendar days after the system is taken out of service. Proof of proper residuals management shall be submitted

to the Regional Water Engineer within 30 calendar days after their removal. The dates of removal and quantities removed shall be specified.

(d) Upon satisfaction of closure requirements specified in (c) above, the Regional Water Engineer shall be contacted, in writing, to schedule a final site inspection of any disposal system which had a SPDES discharge permit to verify that influent and effluent pipes have been sealed and that all solid and residual materials related to the treatment process have been removed.

### **Petroleum Bulk Storage (PBS)**

Delphi currently utilizes underground and aboveground storage tanks and in the event of a cessation of operations would be subject to 6 §360-6.6 Closure of Liquid Storage Facilities. The following requirements would need to be completed:

(a) The owner or operator of the liquid storage facility must prepare a written closure plan for the liquid storage facility and submit the plan with the permit application for the solid waste management facility.

(b) The owner or operator must complete closure activities in accordance with the approved closure plan and within 180 days after liquid collection has ceased.

(c) At closure, all solid waste must be removed from the tank or surface impoundment, connecting lines, and any associated secondary containment systems. All solid waste removed must be properly handled and disposed of according to federal and State requirements. All connecting lines must be disconnected and securely capped or plugged.

(c)(1) Underground tanks must be removed or thoroughly cleaned to remove traces of waste and all accumulated sediments and then filled to capacity with a solid inert material, such as clean sand or concrete slurry. If groundwater surrounding the tank is found to be contaminated, the tank and surrounding contaminated soil must be removed and appropriately disposed. Other corrective actions to remediate the contaminant plume may be required by the department.

(c)(2) Accessways to aboveground and on-ground tanks must be securely fastened in place to prevent unauthorized access. Tanks must either be stenciled with the date of permanent closure or removed. The secondary containment system must be perforated to provide for drainage.

(c)(3) For surface impoundments, all waste residues, contaminated system components (liners, etc.), contaminated subsoils, structures and equipment contaminated with waste must be removed and appropriately disposed. If the groundwater surrounding the impoundment is contaminated, other corrective actions to remediate a contaminant plume may be required by the department. If the groundwater surrounding the

impoundment is found not to be contaminated, the liner system may remain in place if drained, cleaned to remove all traces of waste, and both liners punctured so that drainage is allowed. The impoundment is to be backfilled and regraded to the surrounding topography

(i) In addition to the existing ASTs and USTs, Delphi would be subject to 6 §613.9, Closure of Out-Of-Service Tanks. The following requirements would need to be completed:

(a) *Closure of tanks temporarily out of service.*

(a)(1) Storage tanks or facilities which are temporarily out of service for 30 or more days must be closed as follows:

(a)(1)(i) All product must be removed from the tank and piping system to the lowest draw-off point. Any waste product removed from the tank must be disposed of in accordance with all applicable State and Federal requirements. Tanks must be protected from floatation in accordance with good engineering practices.

(a)(1)(ii) All manways must be locked or locked securely and fill lines, gauge openings or pump lines must be capped or plugged to prevent unauthorized use or tampering.

(a)(2) Storage tanks or facilities which are temporarily out of service are subject to all requirements of this Part and [Part 612](#) of this Title, including but not limited to periodic tightness testing, inspection, registration and reporting requirements.

(b) *Closure of tanks permanently out of service.* (1) Any tank or facility which is permanently out of service must comply with the following:

(b)(1) Liquid and sludge must be removed from the tank and connecting lines. Any waste products removed must be disposed of in accordance with all applicable State and Federal requirements.

(b)(1)(ii) The tank must be rendered free of petroleum vapors. Provisions must be made for natural breathing of the tank to ensure that the tank remains vapor-free.

(b)(1)(iii) All connecting lines must be disconnected and removed or securely capped or plugged. Manways must be securely fastened in place.

(b)(1)(iv) Aboveground tanks must be stenciled with the date of permanent closure.

(b)(1)(v) Underground tanks must either be filled to capacity with a solid inert material (such as sand or concrete slurry) or removed. If an inert material is used, all voids within the tank must be filled.

(b)(1)(vi) Aboveground tanks must be protected from floatation in accordance with good engineering practice.

(b)(2) Storage tanks or facilities which have not been closed pursuant to paragraph (1) of this subdivision are subject to all requirements of this Part and [Part 612](#) of this Title,



including but not limited to periodic tightness testing, inspection, registration and reporting requirements.

(c) *Reporting of out-of-service tanks.* The owner of a tank or facility which is to be permanently closed must notify the department within 30 days prior to permanent closure of the tank or facility pursuant to the requirements of section [612.2\(d\)](#) of this Title.

(d) *Used tanks.* (1) Tanks which are removed and do not meet the standards for new tanks set forth in section [614.3](#) or [614.9](#) of this Title cannot be reinstalled for the purpose of petroleum storage.

(d)(2) If a tank meets the standards for new tanks, it may be reinstalled for petroleum storage if after thorough cleaning and inspection, internally and externally, it is found to be structurally sound and free of pinholes, cracks, structural damage or excessive corrosion or wear. Such tanks must be reinstalled and tested in accordance with requirements of this Part and [Part 614](#) of this Title.

(d)(3) If a tank is to be disposed of as junk, it must be retested for petroleum vapors, rendered vapor-free if necessary, and punched with holes to make it unfit for storage of liquids.

(e) *Financial assurances.* Forms of surety or financial assurances may be required by the department to ensure proper closure of facilities. The amount of such financial assurances will be set by the department. Any requirement of financial assurances must be accompanied by a finding by the department of the public interest and shall set forth the reasons for requiring such financial assurances.

### **Major On Shore Facility (MOSF)**

As mentioned in previous sections, Delphi is a MOSF and must follow requirements under 6 § NYCRR 610 and 17 NYCCR 30. If the Lockport facility has a cessation in operations, the following requirement must be followed:

Part (c)(3) the department shall promptly be notified of any changes in the major facility's design, construction, operation or maintenance which would materially affect the potential for a petroleum discharge.

### **Title V**

Delphi currently operates under a Title V, an air permit. If the Lockport facility has a cessation in operations, the following requirement must be followed:

The "planned" closure would need to be reflected on the application to renew or modify permits must be submitted to the regional permit administrator. Such

application shall provide information supporting the action sought, shall include payment of any fees and, if for a modification, shall include a statement of necessity or reasons for modification. Applications for renewal must be submitted no less than 180 calendar days prior to permit expiration for SPDES, HWMF, RAPs, major APC or SWMF permits or no less than 30 calendar days for all other permit types.

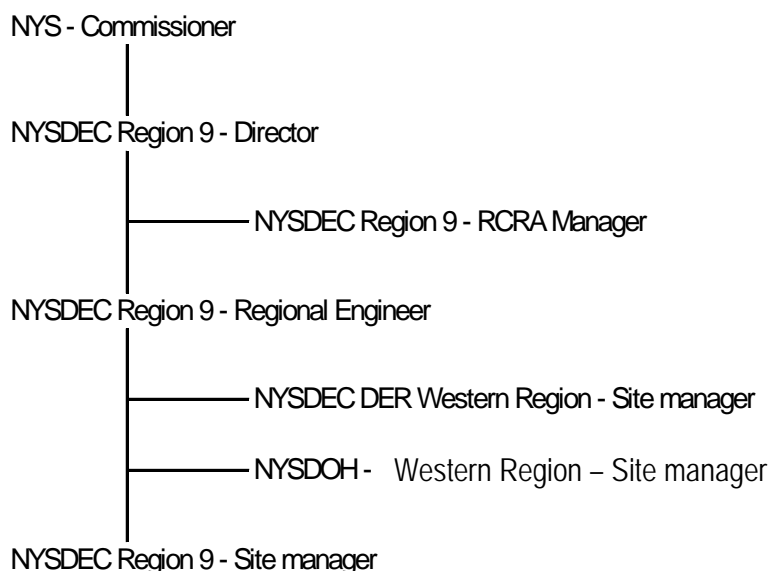
### Gasoline Dispensing Sites

As a gasoline dispensing site, the Lockport facility must complete the following as closure and post closure activities, as directed in 6NYCRR 230.5:

- (a) The owner and/or operator of any gasoline dispensing site must maintain records showing the quantity of all gasoline delivered to the site. These records must be retained at the gasoline dispensing site for at least two years, and must be made available to the commissioner or the commissioner's representative at any reasonable time.

### Other Environmental Programs

Under a consent order with NYSDEC, Delphi continues to monitor a TCE plume that originated from releases from/around Building 8. A Record of Decision was signed by NYSDEC in March 2005. If there is a planned cessation of operations at the Lockport facility, environmental remediation and cleanup activities will need to continue and potentially face a revised clean-up schedule. Remediation is managed through NYSDEC and an organizational chart of the parties (in addition to NYSDEC) is included below.



### **Other Requirements**

As part of any cessation of operations, the Lockport facility must comply with City and County requirements and regulations to properly close plant operations. The Lockport facility currently operates under an industrial wastewater permit filed with the City of Lockport. Notice will need to be given to the City of Lockport in the event of cessation of operations. In addition, Niagara County Health Department and the local fire department may need to be included as part of any closure activities. Other necessary items that should be evaluated prior to the cessation of operations include:

- Prior to any renovation or demolition, the Lockport facility will need to remove and properly dispose of any asbestos containing material and lead based paint in a licensed disposal facility.
- All process equipment will need to be properly dismantled, decontaminated and properly disposed of in a licensed disposal facility.
- All reporting requirements under current permits shall be continued and may require post closure maintenance.
- All universal waste including fluorescent bulbs and batteries must be properly disposed in a licensed disposal facility.

TABLE 1. DELPHI THERMAL SYSTEMS, LOCKPORT, NY FACILITY  
SUMMARY OF AREAS OF INTEREST -OCTOBER 2006

AOI	Building	AOI Figure I.D.	Areas of Interest	AOI Description	Primary Materials Managed	Release Potential Evidence	Summary of Relevant Existing/Available Analytical Data (units=mg/kg or mg/l)	Further Investigation Recommended	Process/ Equipment Status	Additional Information/Summary of Data Gaps	Phase II Plan
1	6	a	Outdoors, along northwestern corner.	Temporary tank for brine storage tank overflowed into ground.	Chrome, Metals	Transfer spill that may have flowed across the road- (per Delphi).	None provided/reviewed.	Yes	Not in use.	Delphi provided information on chrome sumps including dimensions of tanks, volume, number or pumps and size, and rated output; however, no sampling data associated with overflow spill from brine tank was provided. Combine 4 AOIs into 1 AOI - the chrome - hex chrome items within Building 6.	One boring at sump (south side of chrome sump- one ESP boring 2' south of sump), two borings outside, one boring near surface soil sample on lawn on the north side of driveway: JK 18'N; 38' W of NE corner of brine vault, 2' from wall; 32' E of NW corner of brine vault, 2' from wall; 23'N of 6-A-2; 3' E of 6-A-4 (surface soil sample).
	6	a	Outdoors, northwestern corner.	Drainage tile around basement brine vault connected to sump inside. Potential for brine with hex chrome to be forced outside when sump pump failed.	Chrome, Metals	Potential for brine/hex chrome to flow outside when sump pump failed.	None provided/reviewed.	Yes		Combine 4 AOIs into 1 AOI - the chrome - hex chrome items within Building 6.	6-A-2 38'W of NE corner of brine vault, 2' from wall
	6	a	Indoors, north central area.	Prior to drainage in tunnel, area permitted discharge of hex chrome/brine to stormwater Outfall 002.	Chrome, Metals	Former practice of discharging brine/ hex chrome water to Outfall 002.	None provided/reviewed.	Yes		Combine 4 AOIs into 1 AOI - the chrome - hex chrome items within Building 6.	6-A-3 32'E of NW corner of brine vault, 2' from wall
	6	a	Chrome sump, outdoors along northeastern area.	Potential historic contamination, chrome sump outdoors along northeastern area.	Chrome, Metals	Potential historical spills.	No sampling documentation provided/reviewed.	Yes	Existing.	Combine 4 AOIs into 1 AOI - the chrome - hex chrome items within Building 6.	QA/QC samples only.
2	6	b	Outdoors, along northwestern corner.	Two 20,000-gallon underground storage tanks, No. 2 fuel oil were removed in the mid-1980s. The USTs were shown on a 1966 map.	Diesel	No documentation provided on confirmation sampling during closure/removal of USTs.	None provided/available.	Yes		No sampling information associated with closure of the two USTs. Roy provided drawings of installation on 8/25-06.	One AOI. One boring: 7'N and 37'W of NE corner of the brine vault; - 4' off edge of road; 6-A-5 is 3'E of 6-A-4 (surface soil sampling)
3	6	c	Indoors, south central area.	Historical location of model shop PCE degreaser, spill to sanitary sewer-contaminated city STP 9/24/1992.	PCE	Information provided by Delphi relayed that a spill from the PCE degreaser occurred in 1992.	No sampling documentation provided from this specific event; however, vapor intrusion samples were conducted in 2006 to investigate vapor intrusion associated with a PCE/TCE plume originating from Bldg. 8.	Yes	Degreaser was removed.	No sampling documentation provided; however, VI samples were taken in 2006.	One boring at location of small open top degreaser; two borings along sanitary sewer line, G-11 area (floor cleanout). Subject to field verification; soil boring 6-C-1 is 15'N and 10'W of G11; 6-C-2 is 20'N and 20'W of G11; 6-C-3 is 20'N and 30'W of G11.
4	6	d	Indoors, Hydraulic Lifts	Hydraulic lifts without containment.	VOCs	Seven original lifts without containment. Two new lifts installed with containment.	No sampling documentation provided/reviewed.	Yes	Existing.	No sampling documentation provided/reviewed.	One AOI with 3 borings: 18'S, 5'E of J5; 20'S, 5'W of G5; 22'S, 16'W of F5
5	6	e	Dyno sumps, indoor central area	Staining on floors, potential historic contamination	VOCs	Potential historical spills	No sampling documentation provided/reviewed.	No	Existing.	Will take a look at on 8/24/06 to determine if there is a need to further investigate.	Visual Inspection only.

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6	6	f	Former & existing gasoline (6) USTs along western central area of bldg., outdoors.	Historic contamination- from UST release. Former and existing gasoline (6) USTs along western central area of bldg., outdoors.	VOCs	Harrison memo dated 3/12/1985 stated that tank 6-1 (5,000-gal road gas) failed a tightness test at .6 gal/hr leak. The tank was subsequently removed and replaced with a temporary tank.	No sampling documentation provided/reviewed.	Yes	6 USTs existing.	Agreed to use existing wells in the area to test gw. No add'l borings. Roy provided drawings of UST locations and MWs on August 23, 2006. Note: Verify if there is any gw present in the wells.	Verify if there is any ground water present in wells and sample ground water if present.
7	6	z	Vapor Intrusion study at bldg. 6.	Southern portion of bldg. 6. July 2006, vapor intrusion study.	PCE & TCE	VI samples were collected by GZA in July 2006. VI sample results indicated levels of PCE and TCE above MDLs.	VI samples indicated levels of PCE and TCE above MDLs. GZA concluded that the concentrations were only "potential" exposure pathways and did not believe additional work was necessary. Three samples were collected and had results between ND - 64 ug/m <sup>3</sup> ).	No - per NYSDEC direction - NFA.	N/A	No further investigation necessary per NYSDEC NFA.	N/A
8	7	a	Central (Btwn bldg. 7 & 10) outside area - former Tank Farm	Former Tank Farm Area with 8 horizontal tanks, removed by Harrison Personnel. No confirmation closure samples. In area of grassy knoll.	Mineral Spirits, Fuel Oil, Perchloroethylene, Rolling Oil, etc.	Prior to removal/closure of tanks - an inspection described many of the tanks as having visible corrosion. March 26, 1981 interoffice memo stating " Corrosion is evident esp. where the soil touches the exposed areas... 8 tanks represent potential environmental problems...5 of the tanks have been abandoned in place without being properly secured. In addition, most of the vent pipes are in such bad condition that we can't conduct the tank test to prove the integrity of the tanks."	Four wells installed -gw gradient appeared to be to the north. Manganese (7.4 mg/L), acetone (580 mg/L), trans 1,2 dichlor (3,600 ug/L), vinyl chloride (4,600 ug/L), PCE (79 ug/L) and TCE (35 ug/L) were found. Mg, PCE, TCE, and vinyl chloride were above GA standards. Appears as if one round of gw sampling was completed prior to well abandonment by GZA/Earth Dimensions in Sept. 1995.	Yes	Former tanks.	Former Tank Farm and other PCE/TCE issues around the Former Tank Farm area will be rolled into one AOI area.	8 total borings with 3 of 8 borings as bedrock monitoring wells: (1)25'W and 20'N of A39(Monitoring Well); (2) 60'W of A (Monitoring Well); (3)30'W of A15 (Monitoring Well); (4) 20'N and 34'W of A9; (5) 25'N and 28'W of A19; (6)5'S and 15'W of A25; (7)5'S and 28'W of A29; (8) 5'S and 90'W of A25
	7	a	Outdoors, western central area in former tank farm area.	Approximately 4,300-gallons of PCE pumped into tank farm pumphouse through abandoned fill line. Majority entered treated sewer and contaminated sewers and WWTP 2/10/1983.	PCE	4,300 gallons of PCE pumped into tank farm through abandoned fill line.	No sampling data provided/reviewed.	Yes	N/A	Former Tank Farm and other PCE/TCE issues around the Former Tank Farm area will be one AOI area.	Covered under entry above for Line 11.

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7	a		Outdoors, western central area near former tanks farm area.	PCE & breakdown products identified in monitoring well.	PCE	PCE & breakdown products identified in monitoring well in former tank area and N-3 storm sewer between bldgs. 7 & 10.	No sampling data provided/reviewed.	Yes	N/A	Former Tank Farm and other PCE/TCE issues around the Former Tank Farm area will be one AOI area.	Covered under entry above for Line 11.
			Outdoors, along southwestern area.	PCE identified when underground abandoned pipe was broken during 1/3/2005 excavation	PCE	PCE identified during excavation.	GZA completed study in 2005 sample results included 1.1 mg/kg of PCE and .2 mg/kg TCE.	Yes	N/A	Former Tank Farm and other PCE/TCE issues around the Former Tank Farm area will be one AOI area.	Covered under entry above for Line 11.
			Contaminated soil near truck docks near column A-33 on w. side of bldg.	Perc detected at .2 ppm in soils removed during construction of truck docks on west side of bldg. Source not identified and no previous investigation was completed. Perc was historically stored in AST and UST (previous to AST) north and south of truck dock.	Solvents	Perc detected in soil samples.	Perc detected at .2 ppm in soils removed during construction of truck docks on west side of bldg.	Yes	N/A	Lump with former tank farm AOI.	Covered under entry above for Line 11.
9	7	b	Indoors, western central area of building.	Limited hex chrome use, alum vacuum brazing operations, military heat exchangers.	Hex chrome, aluminum,	Historical spills/leaks.	No sampling documentation provided/reviewed.	Yes	Former sump.	Delphi identified the sump.	ESP borings - 5' N and 2' East of Q33; 14'S and 9' W of Q35; and 22' S and 18' W of Q35 (can use skid rig if move 3' S and 3'W).
10	7	c	Indoors, northeastern area of building	Historical Coal Pile Areas	Sulfate, metals, cyanide	Outdoor sampling indicated elevated levels of iron and aluminum.	No sampling data was provided/reviewed (related to indoor coal storage pile); however, analytical data from outdoor area was provided by Delphi and reviewed.	Yes	N/A	No sampling data was provided/reviewed (related to indoor coal storage pile). Agreed to combine the coal pile and black and orange staining and former waste oil storage (NE corner outdoors) as one AOI within the NE corner area.	3 borings, all outside; one boring 6' west of NW corner of Building 12 - install temporary MW and collect ground water sample at this location; one boring 20' south and 10' west of SE corner of N2 plant; one boring half way between nearby cooling tower and imaginary line extending due east from northern side of nitrogen plant.
			Outdoors, northeastern area of building	Historical Coal Pile Areas	Sulfate, metals, cyanide	Orange and black staining under and near coal pile area- 9/19/1994. Delphi provided coal pile drawings and documentation.	Samples collected at creek had 202 mg/L of iron, 3.4 mg/L of aluminum, and 7.84 mg/L of manganese. Samples collected from creek on 7/20/1989 showed high iron (183 mg/L), aluminum ( 1.56 mg/L) and manganese (19.5 mg/L). Samples collected at creek on 4/27/1988 had 9.6 mg/L of iron.	Yes -at Creek near outfall 002.		Agreed to combine the coal pile and black and orange staining and former waste oil storage (NE corner outdoors) as one AOI within the NE corner area.	Covered under entry above for Line 17.

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11	7	e	Indoors, southern area of building	Extensive use of lead solder for decades.	Lead	Evidence of lead in roof gravel.	Delphi relayed roof gravel is disposed of as hazardous waste.	Yes	N/A	Agreed to make as an AOI and collect some surficial samples 0 - 2" and 2" - 2'.	Will collect surficial samples in grassy area east of Central Creek area; 3 locations E-1 to E-3, locations marked w/GPS. Details of borings/sediment samples on figure. One sample from each location from 0-1 foot below ground surface.	
12	7	G-1	Degreasers located indoors along southwestern to south-central area of building.	Historical PCE & TCE degreasers located in the building, with a history of leaks and spills.	PCE & TCE	Age of degreasers and history of leaks and spills.	L57-468 and L57-468 degreaser sewer sample results (jars 1 & 2) collected 7/10/1989 had PCE 233 mg/L and 348 mg/L of 1/1/2/2-tetrachlor, (bottles 1 & 2) had 682,000 mg/L of PCE, 70 mg/L TCE and 1,1,2,2-tetrachlor could not be identified due to large dilution. Also, a soil vapor study was conducted by Huntingdon/Empire in 1992. 7 measurements were collected and readings ranged from .2 - 400 ppm. Highest readings were found near the center, north side, and west of a former degreaser.	Yes	Former degreasers	Samples collected from manhole 10' south of area L51 - N51- across from 468 degreasers.	Former PCE/TCE degreasers are divided into 5 separate AOIs (G-1 through G-5). G-1 borings to be placed: (1) 12' S and 13' W of C17; (1) 12' S and 3' W of L13; (1) 20' E and 30' S of Q13, and (1) 5' N and 5' E of Q3	
		G-2	Degreasers located indoors along western-central area.	Historical PCE & TCE degreasers with separator pits.	PCE & TCE		Information as noted above.	Yes	Former degreasers	Samples collected from manhole 10' south of area L51 - N51- across from 468 degreasers. Delphi provided drawing M-439 which showed actual location of pit.	G-2 borings include: (1) 6' W of G35 (degreaser location) ; (1) 4' W and 12' S of E35 (separator pit location); (1) 13'E and 11'S of E35 (degreaser location).	
		G-3	Degreasers located indoors along northwestern area of building.	Information as noted above.	PCE & TCE		Information as noted above.	Information as noted above.	Yes	Former degreasers		G-3 borings include: (1) 15' E and 5' N of J-59, (1) 11' N of E-53, (1) 8' W of E-55, (1) 16' E and 4' S of A48 (ESP to lower floor only), and (1) 26' E of A-48 (between columns A-49 and A-47).
		G-4	Degreasers located indoors along central to central eastern area of building.	Information as noted above.	PCE & TCE		Information as noted above.	Information as noted above.	Yes			G-4 borings include: (5 borings, one in center of AOI and one @ each of four degreaser locations): (1) 19' N and 4' East of N-37, (1) 8' S and 4' E of N37, (1) 10' S of S-37 and 4' ?, (1) 2' S of midpoint between S-39 and U-39, (1) center point - 17' W of S37 and 16' N of S-37
			Chrome sump, center of bldg. Q-35	Historical concerns with spills/releases.	Metals		No sampling data provided/reviewed.	Information as noted above.	Yes	Former sump.	Q-35 is the location.	Former AOI designation = W; combine with G-4 AOI; no additional boring required.
		G-5	Degreasers located indoors along north central area of building.	Information as noted above.	PCE & TCE		Information as noted above.	Information as noted above.	Yes			G-5 borings include: (1) 16' N and 5' E of Z-45, (1) 14'W and 3' S of X-49, (1) 14' W and 3' S of X-53
		G-6	Indoors, south-central area.	Former degreaser.	VOCs		Information as noted above.	Information as noted above.	Yes	N/A	One boring on southeast and northeast of former degreaser location. No specific/detailed drawing for this individual location.	One boring on southeast and northeast of former degreaser location. G-6 borings include: (1) 15'S and 20'W of MM59; (1) 30'S and 35'W of MM59

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		G-7	Former degreaser with separator pit.	Former degreaser with separator pit.	VOCs		Information as noted above. Delphi provided drawing M-438.	Yes	Former pit.		Two soil borings. (1) 21'W of X61 and 13'N of X61 (separator pit boring); (1) 30'N and 14'W of X61 (degreaser boring).
		G-8	Former degreaser with separator pit.	Former degreaser with separator pit.	VOCs		Information as noted above. Delphi provided drawing M-437.	Yes	Former pit.	One boring at pit and two borings at each of the two degreasers on west side of pit.	Pit boring - 11'S of Q51 and 13'W of Q51. Degreaser borings - (1) 12'E of N51; (1) 14'N, 20'E of Q49
		G-9	Former degreaser.	Former degreaser.	VOCs		Information as noted above..	Yes	Former degreaser.	Location not found on map - thus, install 3 borings.	This sub area was deleted - Delphi table reference to degreaser(s) near column L45 believed to be erroneous by Delphi Environmental Engineering.
		G-10	Former degreaser with separator pit.	Former degreaser with separator pit.	VOCs		Information as noted above.. This location was shown on a 10/14/82 map provided by Delphi.	Yes	Former pit.	Two borings: one at pit and one at degreaser.	Three borings - one adjacent to separator pit (8'S and 4'W of C49) and 16'E, 4'S of A48; and 26'E of A48.
		G-11	Former degreaser spill.	D-400 PCE Spill from Degreaser	VOCs		300 gallons released to treated sewer on May 7, 1990.	Yes	Former degreaser.	Not on 10-4-82 Drawing.	3 borings: (1) 12'S and 20'W of C53; (1) 5'N and 12'W of C53; (1) 5'N and 8'E of C53.
13	7	I	Outdoors, in northeastern corner of building - April 19, 1996	UST found during audit in mid-1995, tank closed prior to 1982, not registered, no odors, no visual staining, materials pumped out and backfilled. See PLT-1480 Sheet, Task 2.		Tank closed prior to 1982. No odors - however no confirmation samples were collected.	No environmental sampling conducted.	Yes	Former UST	Drawings provided by Delphi for 7N Ramp, show a 16' x 8' UST gasoline, based on the dimensions provided in the drawing the tank would be a 6,000-gal UST. Center line of tank was shown as 12' from the east facing wall and is situated 18' in from north facing wall (south end of tank) - north end is 2' from north facing wall.	UST location presumed to be inside of dock based on site figure provided by Delphi; locate 6'N and 4'W of J66
14	7	m	Used Oil Containment Area- outdoors along northeastern corner of bldg north of tanks 7-11 and 7-12	Low concentrations of PCBs and VOCs was found in waste oil storage area during 1995 reconstruction of the drain system and containment pad of 2 waste oil ASTs.	PCBs and VOCs	Low concentrations of PCBs, VOCs found in waste oil storage area	All soil around pad was removed to bedrock except for small volume of contaminated soil surrounding the foundation for the ASTs in the center area. Perimeter sampling indicated surrounding soils beyond the excavation limits were not contaminated.	Yes		Collect one groundwater sample.	Cannot drill through area liner. Place borings along accessible sides of area and along sewer line inside. Borings at (1) 40'W and 120'N of PP63 column, (1) 72'W and 55'N of PP63 (1) 20'W and 4'S of PP63 (indoors).
	7	m	Outdoors, northeastern corner of bldg. Evidence of leakage from oil collection sewer	Outdoors, northeastern corner of bldg. Evidence of leakage from oil collection sewer discovered when installing oil tank containment.	PCBs, VOCs	Evidence of leakage from oil collection sewer discovered when installing oil tank containment.	No sampling data provided/reviewed.	Yes	N/A	Agreed this item was to be lumped with the waste oil pad AOI along NE corner.	Need to evaluate extent of liner; cannot drill through. Potentially place boring along sewer line inside building if the liner extends all the way to building. Potentially place a boring on each side. 95'W and 5'N of PP63
	7	m	Outdoors, northeastern area Mg brazing shed.	Outdoors, northeastern area Mg brazing shed and former use of oils.	Mg, VOCs	Historical use of oils. Mg not a major concern.	No sampling data was provided/reviewed.	Yes	N/A	One boring next to brazing shed.	One boring. 10'N of FF63
	7	m	Central area, indoors.	Rolling Mill Reclaiming Tanks & Pump House	Oils	No sampling data provided/reviewed.	No sampling data provided/reviewed.	Yes	Former rolling mill.	Two figures (per Delphi) show 2 different locations of this former rolling mill. ERM to research sewers in this location. One boring for former mill.	One boring. 20'W and 35'S of PP63



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15	7	p	Acid flux room, south end of Bldg. 7	Tin and zinc contamination detected in soil beneath the floor of the bldg., identified as being associated with releases from former sumps used for liquid flux storage. Extent of soil contamination has been identified. No groundwater investigation completed.	Metals - tin and zinc	Soil beneath floor of bldg.	Tin - up to 1,200 ppm and zinc - up to 19,80 ppm was detected in soil in and around acid flux room.	Yes	N/A	NFA from DEC on 11/21/2001	Place boring 14' N and 9' W - one gw sample (probably rock), NE of room of FF3
16	7	r	Bldg. 7 summer of 1998 Delphi installed 2 press machines, excavated around manhole for an inactive sealed oil collection sewer	Testing of liquids found PCBs.	PCBs	PCBs of 570 mg/kg in liquid sample. Corrective actions included 37 sampling points, equipment area was washed with "capsur", 4" pipe plug was installed, liquids and sediments were removed from equip pad sump and separator sumps. Post results showed acceptable levels.		Yes		Samples collected on 6/6/98 at C&D yard mid pile - 42 mg/kg of PCB 1242, C&D Yard SW corner - 1,800 mg/kg of PCB 1242, C&D yard west edge - 5,500 mg/kg of PCB 1242, C&D yard brick - 210 mg/kg of PCB 1242. Cleanup report states that affected areas were cleaned up to acceptable levels - need to see follow-up analytical lab reports that show decreased levels after 6/6/98 sampling. The diagram showing 37 points for C & D area and Metger site was drawn on 6/11/98 with results -- Delphi to provide analytical reports after June 1998.	One boring in this area. 10'N of KK57
	7	r	Die storage rack, 10' east of Column KK55 in Bldg. 7, cracks and seams that run north to south	Employee complained that when use of forklift over area, oil "oozes" out from floor beneath.	Oil/and or PCBs	Oil coming through cracks	Delphi tested for PCBs and results came back BDL	Yes		Requested more info from Roy, and received info from Greg Kulka.	One boring in this area near cracks in the floor -near column KK55. @KK - place at obvious cracks.
	7	r	On 6/5/1998 Delphi found through analytical testing of liquids in a manhole near column MM53, from an inactive oil collection system that PCBs were present.	PCBs found in liquid in manhole of inactive oil collection system	PCBs	samples were taken and Delphi claimed all areas of PCB impacted oils and soils were cleaned to TAGM 4046; however, no analytical were attached to the letter. Letter also had proposed SOW to verify MH is clean and dry, filling MH, and capping.		Yes		Cleanup report states that affected areas were cleaned up to acceptable levels - need to see follow-up analytical lab reports that show decreased levels after 6/6/98 sampling. The diagram showing 37 points for C & D area and Metger site was drawn on 6/11/98 with results -- Delphi to provide analytical reports after June 1998.	One boring in this area. 12'E of MM47

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17	7	ff	Northwestern corner of bldg. (indoors). Well - oil leaked through (train well) oil seep.	Northwestern corner of bldg. Train well - oil leaked through.	VOCs, PCBs	Physical evidence of oil through wall.		Yes	N/A		Combined as AOI "ff." Place one boring in this area, 7'E of A67, near foundation; go to top of lower floor and stop
	7	ff	Along northeastern corner of building (indoors) - D-466 Presses	Oil from D-466 presses entered from storm sewer via buried drains in old train and truck docks, oil recovery system was installed.	Oil	Soil in storm sewers.		Yes	N/A		Mark entire dept. as AOI. One boring next to sewer, 8'S and 18'W of C67 next to storm sewer. Another boring next to "oil through foundation area" -- area 15' N and 5'W of column E63.
18	8	001	Chromate system trench repair - columns L-81 to S-83	A breached spill containment trench was repaired in 2000. Soil samples were collected before repairs in areas where the concrete had been degraded and results indicated chromium concentrations up to 2,600 ppm. 16 tons of chromium contaminated debris (primarily concrete) was disposed off-site.	Chromium.	Soil samples were collected in areas where the concrete had been degraded and results indicated elevated chromium concentrations.	Soil samples were collected before repairs in areas where the concrete had been degraded and results indicated chromium concentrations up to 2,600 ppm.	Yes		According to H & A, no post - excavation soil sampling or groundwater sampling (as of 2001) was conducted in these areas.	Combine as one AOI for historical chrome use areas. One boring near location of piping leak as per Delphi; soil boring location is 20'W and 10' N of S81.
	8	001	Former condenser lines 1 & 2 (columns N-103 - 113)	Degraded sewers were found when the condenser lines were decommissioned in 1999, contaminated soil was found and removed during demolition of containment features, sumps, sewers in 2000. Approx. 60 tons of chromium contaminated debris was disposed off-site.	Chromium	60 tons of chromium contaminated debris was disposed off-site.	Contaminated soil was found and removed during demolition of containment features, sumps, sewers in 2000. Approx. 60 tons of chromium contaminated debris was disposed off-site.	Yes	Removed system.	According to H & A, no post - excavation soil sampling or groundwater sampling (as of 2001) was conducted in these areas.	Combine as one AOI for historical chrome use areas. Two borings. 3'N and 8'E of N107 (consider line #2 sump); 10'N and 3'E of V105 (consider line #2 sewer).

TABLE 1. DELPHI THERMAL SYSTEMS, LOCKPORT, NY FACILITY  
SUMMARY OF AREAS OF INTEREST -OCTOBER 2006

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	8	001	8 former chrome sumps	8 former chrome sumps - 7 locations found on maps; however, 6 boring locations were determined to be representative areas of former sumps.	Chromium	Historical spills/releases	Pictures of a chrome sump removal ( 6/9/1992) indicated evidence of severe corrosion of line #4 external wash (columns Q-97 - W-99)-contaminated soil was found and removed in 1992.	Yes			Combined as one AOI for historical chrome use areas. One boring at selected sumps. 4'N and 1'W of X91 (sump #4); 23'S and 2'W of Q99 (sump #3); 20'S and 6'W of Q113 (sump #1); 21'E and 2'S of S103 (sump #2); 18'S of X85 (sump #5); and 10'S and 3'E of S93 (sump #7).
19	8	002	Outdoors, along north western corner.	Three underground tanks (8,000-gal, naphtha 8,000-gal, paint surge, 4,000-gal paint dump) removed in the area of columns C/E- (exterior to) 11/113	Solvents	Vender invoices indicate all 3 tanks were cleaned, but no records whether they were removed or closed in place and no records of confirmation sampling during closure.	No sampling data provided/reviewed.	Yes	Former USTs.		Two borings to be placed next to former USTs. Borings located: from east side of stair well outside building just west of G113; 42'E along well and then 5' out from wall and from lowest step of stairs (same as for 8-002-A); 2' west along wall and then 10' out from wall
	8	002	North central area, outdoors, emergency dump tank with floor drains in paint booth.	Underground Paint Dump (or solvent) tank discovered during HTC installation. UST removed.	Solvents.	Soil samples had elevated levels of metals.	Soil samples collected from excavation: up to 12,000 mg/kg aluminum, up to 20,000 mg/kg of iron, up to 89,500 mg/kg of magnesium, .2 mg/kg of cyanide.	No	Former tank.	DEC did not require Delphi to register the tank due to age. Tank was removed 7/19/2004. Excavation soil piles were stored north of building 8.	One boring at stairwell near E113; 6' west of west side of stairwell, and 3'north from the building wall.
20	8	003	Outdoors, south - southeastern area (due southwest of pumphouse #2).	Two 20,000-gallon underground fuel oil tanks removed.	Petroleum constituent s.	The former tanks were located outside the south wall near column XY-75. Records indicate tanks were removed in mid-1980s. No records were available to indicate contamination encountered or if sampling was performed.	No sampling data provided/reviewed.	Yes	Former USTs.		Boring locations changed from original locations because Delphi Drawing #M248 shows tanks in 7' deep rock tub; 3 borings: (1) 28'S and 20'W of reference point (RP) which is corner of building closest to interior column BB75 (bore to top of rock only at this location for investigation of piping run from USTs to building), (1) 53'S and 5'W of RP (must get GW sample in bedrock), (1) 53'S and 27'W of RP (must go below concrete anchor pad if affected soil or ground water is not encountered above concrete pad).
21	8	004	Outdoors, southeastern corner	Underground storage tank -1,000-gal gasoline removed	Petroleum constituent s.	Records for the design/construction. Of containment for a TCE formerly located near the SE corner indicated that a 1,000-gal gasoline UST & assoc. piping was removed to make room for TCE AST.	No sampling data provided/reviewed.	Yes	Former USTs.		Three soil borings around former UST and piping, all measurements from outside corner closest to MM83 : 17'S and 8'E, 9'S and 13'E, 4'S and 3'E.

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22	8	005-1	Indoors throughout building.	Historical solvent degreasers located in this building.	Solvents	Historical spills/releases		Yes	Former degreasers	7 TCE degreasers and 4 TFE.	One boring - 15'S and 5'E of AX105
	8	005-2	Indoors, southwestern corner of building.	Approximate historical location of D-868 TCE degreaser. Solvent odors present during floor replacement.	Solvents	Soil investigation was conduct in April 1994, 9 borings were installed and TCE levels were below cleanup standards; thus, no further action was taken.	.03 mg/L of TCE was found. 16 mg/kg of TCE was found in soil samples (range of results 1.7 -16 mg/kg)	Yes	Former degreaser.	Drawing M-417 was provided by Delphi. Figure did not confirm exact location (location was crossed out) and a note stated - actual location to be determined prior to construction. Also, there appears to have been two degreasers - two inputs.	Three borings. (1)15'W of E85; 4'S of 6" treated sewer (due N of E85); 10'W and 20'S of E85
	8	005-3	Indoors, southeastern corner of building.	Approximate historical location of D-861 TCE degreaser#6, release to sewer 10/16/1987.	Solvents	Limited information was provided/reviewed.	Limited information was provided/reviewed.	Yes	Former degreaser.		Three borings - 8'N and 5'E of KK 85, 8'N and 5'E of HH 85, and 8'N and 5'E of FF 85.
	8	005-4	Indoors, eastern - central area.	Historical solvent degreasers located in this building.	Solvents	Limited information was provided/reviewed.	Limited information was provided/reviewed.	Yes	Former degreaser.		Five borings - 15'W and 15'S of PP 91; 20'W and 15'S of MM 91; 20'W and 20'S of KK 91; 5'E and 15'S of FF 91; 10'S and 2'E of DD 91.
	8	005-5	Indoors. Northeastern area.	Historical solvent degreasers located in this building.	Solvents	Limited information was provided/reviewed.	Limited information was provided/reviewed.	Yes	Former degreaser.		Four soil borings: 10'S and 10'E of KK 101; 10'S and 10'E of KK 109; 10'E of KK109; 10'E and 35'N of KK109.
23	8	006	Northeast corner- indoors - historic press operations	Northeast corner- indoors - historic press operations	VOCs, SVOCs, PCBs, Oils	Severe staining was observed around column W-107 to PP-113.	No information was provided/reviewed.	Yes	Former press equipment.	6 borings	Boring 10' S and 4' E of FF109; boring 8' S and 7'W of DD109; boring 7' S and 3' E of BB109, boring 9' S and 1'W of Z109; boring 10' N and 18'W of BB111; boring 16' S and 20' W of HH111.
24	8	009	Southeastern corner - outdoors OWS	Southeastern corner in pumphouse #2- indoors - has OWS - may be historic issues	Oil, metals	May be historic issues.	No sampling information was provided/reviewed.	Yes			Two borings outside of the sumps - 10'N and 5'E of the SE corner of Pump House #2; 10'W and 5'S of the SE corner of Pump House #2.
25	8	010	Southwest corner, indoors- oil contamination at scrap dock	Southwest corner, indoors- oil contamination at scrap dock		Severe oil staining around this area.	Spill reported to DEC #0475299 and NFA issued by DEC on July 27, 2005	No	N/A	Case was closed by DEC however staining was still evident. Interior petroleum affected soil beneath building.	No need for further investigation based on case status and existence of recovery well.
26	8	011	Southeastern corner- catch basin, outdoors	Southeastern corner catch basin, outdoors	various	May be historic issues.	No sampling information was provided/reviewed.	No			Visual Inspection.

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27	8		Outdoors, southeastern corner of building	TCE detected in soil 11/16/94 during an excavation to repair sprinkler lines. Site of historical aboveground TCE storage tanks	TCE	This area was the subject of the listing of the site on the NY State Registry of Inactive Haz Waste Sites. The 1,200-ft. long plume of gw contamination from a source area in the vicinity of a former TCE AST was the subject of a focused RI/FS being conducted pursuant to a consent order signed with the NYSDEC in April 2001. Investigations began in 1995. DNAPL is present at one well between the source area and property line. Monitoring of wells occurred from December 1998 - October 2001.	Soil results in the vicinity of the former tank ranged up to 160 ppm for TCE and 5.6 ppm for 1,2-DCE, and 1.7 ppm for PCE. One sample contained 43 ppm of TCE. MW-7 sample ranged from 921 mg/L to 12.3 mg/L). Levels of contamination detected at the property line were below .1 ppm. Contaminant levels have been generally stable over time, and the plume did not appear to be migrating.	No		ROD completed March 2005. DEC accepted remedial option #2 Monitored Natural Attenuation. GW results ranged: (TCE) ND - 6,500,000 ppb, (1,2-DCE) ND - 310,000, (PCE) ND- 120,000, vinyl chloride ND - 40,000. TCE levels exceeded standards 64 of 89 samples, 1,2 - DCE was exceeded 82 of 89, PCE was 37 of 89, and vinyl chloride was exceeded 72 of 89.	Duplicate area of 10,000-gal AST TCE tank handled under Order on Consent - no further investigation as part of this Phase II effort.
28	8		Outdoors, southeastern corner	Removal of tank - 10,000-gallon TCE aboveground tank (8-18) disturbed and moved due to line break 11/1994	TCE	No sampling information was provided/reviewed.	No sampling information was provided/reviewed.	No	Former AST.	Tank was removed.	This is already covered in RI/FS. No further investigation. Samples listed are QA/QC samples only.
29	9	100	Outdoors along southeastern area of building, near column 9J-81.	Underground gasoline tank closed in place 2,000-gal. gasoline.	VOCs	Facility personnel reported that a 2,000-gal gas tank was located near 9J-81 outside of the ramp. Records say that a 2,000-gal. gasoline tank was cleaned and closed in place in mid-1980s; however no sampling records were found.		Yes	Former UST.		Original locations corrections based on Delphi Drawing #M151 - 3 borings to bedrock 10'S and 10'E SW corner of loading dock (interior column 9J79), 10'S and 10'E SW corner of loading dock (interior column 9J79), 20'W of SW corner of loading dock.
30	9	101	Outdoors along southwestern area of building.	Two 20,000-gallon underground fuel 9-21 & 9-22. Removed on 12/1990.	#2 Fuel oil	Documentation dated March 12, 1995, "Update on Underground Tank Closure and Tightness Testing," page 2 has a paragraph stating that (2) 20,000-gallon USTs full, leaked under test conditions. (2) 20,000-gallon oil tanks leaked at 1.93 gal/hr leak.	Six post removal samples taken of soil at bottom of excavation for TPH and BTEX. TPH was 69 ppm or less and BTEX was BDL of .005 ppm. 2 samples of TPH were 392 and 524 ppm (southwest and south center of UST pit bottom). Ethyl benzene was detected at .010 and .072 ppm and xylene was .021 and .068 ppm.	Yes	Former UST	Drawing S-13021 provided by Delphi shows former location and this map will be used in the field to determine locations of two borings.	Two borings each with a temporary monitoring well. Former USTs in 9' deep bedrock tub (see Delphi Drawing # S-1321); one boring located in the center for former UST excavation, the other down-gradient; both borings to be advanced into ground water (in bedrock if necessary); Former UST excavation boring 18'W and 18'S of SE corner of Building 9 (corner adjacent to interior column 9DD79); down-gradient boring 15'E and 18'S of SE corner of building 9 (corner adjacent to interior column 9DD79); down-gradient boring must be advanced to ground water in bedrock.

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31	9	102	Historic oil spill at 9KK - 9MM	Historic oil spill at column 93.	VOCs	No sampling information provided/reviewed. A big area cut out of concrete floor, Toshiba Mill area, hydraulic oil.	Sampling was conducted in area but analyticals were not found prior to the submittal of this report.	Yes			One boring 16' W and 12'N of MM79; boring 7' N and 12'W of KK93; boring 18'S and 10'W of MM93; one boring 15'E and 5'S of HH93 (on layout of sewers). Also one boring 13'N and 9'W of KK91. All skid rig.
	9	102	Sump beneath oil tanks at loading dock along southwestern corner	Sump beneath oil tanks at loading dock along southwestern corner	VOCs	May be historical issues. No sampling information provided/reviewed.	No sampling information provided/reviewed.	Yes			Covered by borings listed in Line 63.
32	9	108	Southern Portion of Bldg.	Oil leaked from non-treated sewer in 1994, southern portion of bldg. partially outside and in dock.	VOCs			Yes		Oil leak from non-treated sewer. Found during excavation for building addition in 1994. Determine where sewer ties into Bldg. 9 at what elevations.	Three Sewers running along side each other E-W parallel to south side of Building #9. Approx. locations of 2 outdoor borings (HSA) - boring 12.5' S and 70'W of reference point (RP108 = building corner closest to interior column 9L83); boring 12.5' S and 135'W of RP108; another boring (shared between AOCs 101 & 108) - boring 12.5' S and 9'W. Two borings per 9/07/06 conference call to investigate laterals from outside sewer lines that run beneath Building #9; one boring 10'N and 10'E of 9DD83; one boring 10'N and 10'E of 9N83 (both are close to subfloor sanitary lines).
33	10	103	Outdoors along northwestern corner of building.	1000-gallon underground gasoline tank, 10-25, filled in place with concrete on 12/1986	VOCs	No sampling information provided/reviewed.	No sampling information provided/reviewed; however this tank passed a tightness test in 1984.	Yes	Former UST	Dispenser pump at ramp.	*** Revisions based on Delphi Drawing #ME-M7*** From inside building corner closest to column WL63: one boring 11'N and 12'W, and another boring 20'N and 6'W.
34	10	104	Outdoors along southwestern corner of building.	Underground gas tank 10-1 2,000-gal gasoline.	VOCs	No sampling information provided/reviewed.	No sampling information provided/reviewed.	Yes	Former UST	Did not see this specific tank on older maps/drawings.	From outside building corner to WR45; one boring 10'N and 16'W; one boring 4'S and 4'W.
35	10	105	Outdoors, west central area.	Evidence of soil staining - salvage equipment storage - runoff.	VOCs, metals	No sampling information provided/reviewed.	No sampling information provided/reviewed.	Yes	N/A		Hand auger boring near SE corner of storage pad. Sample analysis includes one additional parameter each for QA/QC. Boring location 45' W of western building wall at location of interior column WY34.
36	10	106	Painting operations w/hex chromate	Historic painting operations.	VOCs	Delphi provided drawing showing location.	Delphi provided drawing showing location	Yes	N/A		One boring 19'W of WV41
37	10	107	Soil excavation for sump- indoors near WK45	Soil excavation for sump- indoors near WK45 revealed PCE and naphthalene in soils.	VOCs	Delphi provided limited data.	In December of 1999, while excavating for a sump in Building 10 near column WK-45, a mothball-like odor was encountered. Soil samples were taken from the excavation and from several boxes (bins) that soil had been placed in. PCE was detected in the range of 0.31 to 2.7 mg/kg in the bins, and at 0.047 mg/kg in the excavation. Naphthalene was detected in the excavation at 0.31 mg/kg. No other volatiles were detected.	Yes	N/A		Three borings TBD on October 6, 2006.

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38	12	112	Outdoors along northeastern corner of building.	Underground storage tank 1,500-gal of diesel removed.	VOCs	Tank was installed in 1956 and removed in 1986 (tank 12-26). No sampling was documented.	No sampling was documented.	Yes			One boring 6'N and 9'W of NE corner of Building 12 (near center of removed diesel UST excavation).
	12	112	Indoors throughout building.	Metals contaminated groundwater observed in building sumps.	Metals			Yes			Covered by ground water sample to be collected as described above in Line 17 (AOI 7-C)
	12	112	Northeast corner of building.	Sump- coal bin. May be historical issues.	Sulfate, metals, cyanide		No sampling was documented.	Yes			Covered by ground water sample to be collected as described above in Line 17 (AOI 7-C)
	15	112	Outdoors southwestern corner of building.	Underground gasoline (15-49) and kerosene tanks closed in place.	VOCs	15-49 is listed as a 550-gal gasoline tank filled in w/concrete in the 1980s. A 1983 tank removal vendor proposal lists as a 500 gal kerosene to be removed. No other info was available.	No sampling information was provided/reviewed.	Yes	Former UST		2 Borings -one next to each tank. QA/QC samples. Boring 15-112-A = 7'N and 6'W of western SW corner of Building #15 (UST removed); Boring 15-112-B = 4'S and 4'W of southern SW corner of Building #15 (UST abandoned in place).
39	18	110	Tanks 18-39 and 18-40- 5,000-gal and 2,000-gal diesel USTs removed in 8/1990.	Gasoline and Diesel USTs removed.	VOCs	Soil samples showed evidence of release.	Soil sample collected at 18-39 TPH was below 159 mg/kg. Observations of 18-40 at the time of tank removal - showed visible contamination at bottom of tank. Soil samples collected showed 789 mg/kg TPH. Remainder of soil was determined by Mr. Zak from NCHD (Documentation did not say how Mr. Zak determined remaining soil was clean). No gw samples.	Yes	Former USTs.	Tank 18-39Low BTEX in bottom samples. No wall samples taken. NCDH was present -no visual or odors and passed tightness testing several months before.	Three soil borings based on UST drawings. Former USTs located near/beneath current ASTs. Boring 18-110-A = 108'S and 12'E of SW corner of Building #18; Boring 18-110-B = 40'E and 85'S of SW corner of Building #18; Boring 18-110-C = 108'S and 16'E of SE corner of Building #18.
40	18	111	North central area	Vehicle steam cleaning booth	VOCs,metals	Potential historical concerns	No sampling information provided/reviewed.	Yes			Complete a visual inspection.
41	18		Oil spill to storm ditch north of bldg.	Hydraulic oil (vol. not recorded) was spilled from scrap equipment to the pavement north of bldg. then flowed to drainage ditch. Oil was found in absorbent booms.	VOCs	DEC spill 9975689 on 2/24/2000 - NFA.	No sampling of sediment.	No	N/A		No further investigation. QA/QC samples only.

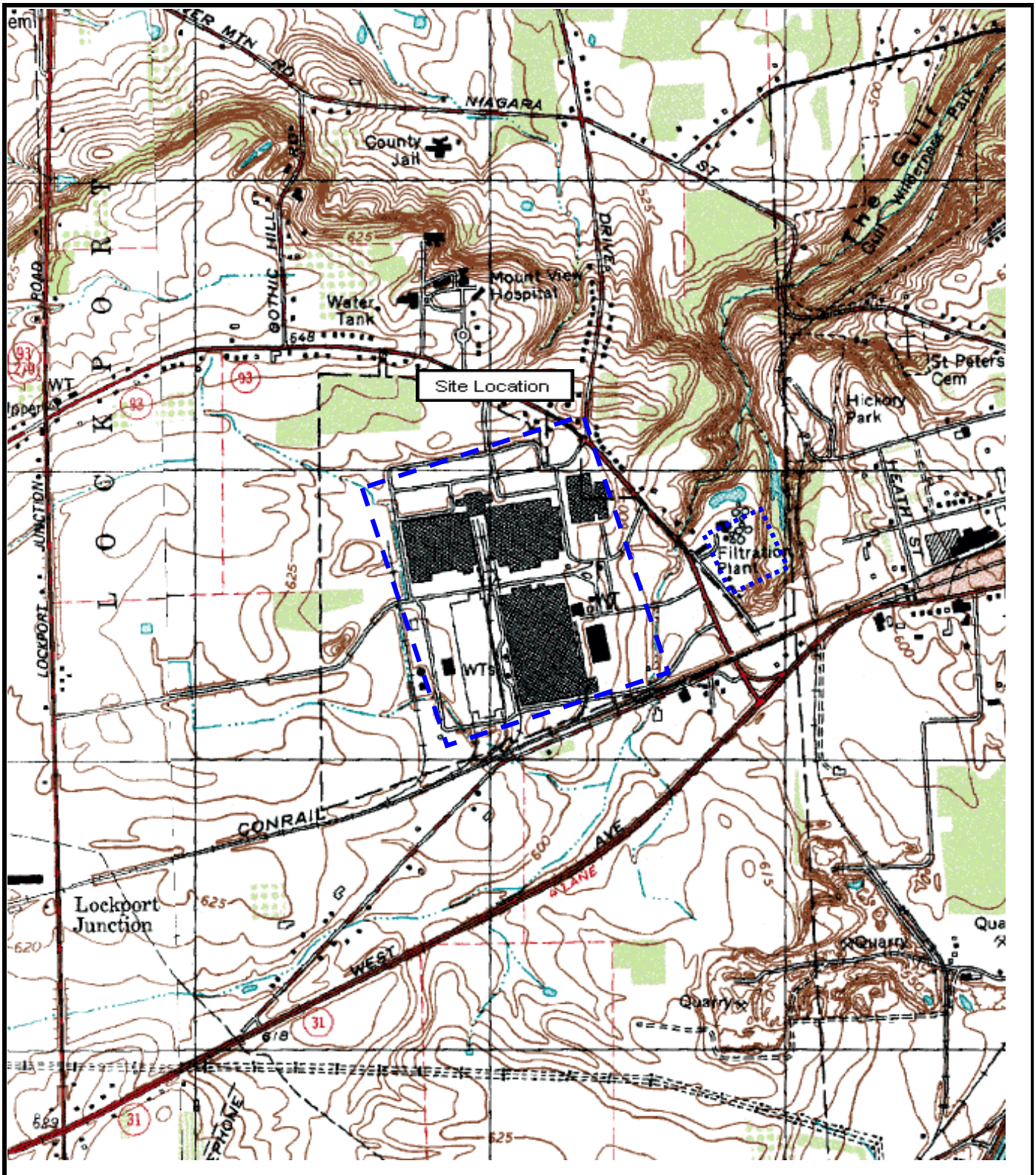
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42	All Bldgs.		All Bldgs. All contiguous area of wood block.					No		Delphi provided sampling data of wood block.	Delphi provided (Cindy and Greg) info on sampling of floor block.
43	10,14,16,17	DD	Western side of property.	Miscellaneous drain pipes go out to creek.	N/A	Creek samples have indicated elevated levels of metals and VOCs.	Creek samples have indicated elevated levels of metals and VOCs.	Yes	N/A	3 samples to be collected from creek.	Three borings in the creek on the west side of the property; locations indicated on figure.
44	Central Creek	116	Central Creek Area		VOCs, metals, PCBs			Yes			Three boring locations 116-2 through 116-3. Locations marked w/GPS. Details for borings/samples on Figure.
45	GW Site Wide		Existing GW conditions site wide		VOCs, metals, PCBs			Yes			One well north of north side of Bldg. 8, approx. 10' from column DD113
46	Outfall 002	114	Near Outfall 002	Sheen and staining in areas.	VOCs, metals, PCBs			Yes			Collect sediment sample in area where sheen was observed. Location marked with GPS and wooden stake.
	Outfall 002	114	Near Outfall 002	Underground chrome line - to stream bank. May be historical issues.	metals			Yes			Collect soil sample at location of line break - one soil boring, location marked with GPS and wooden stake.
	Outfall 002	114	Outfall 002	Wooden floor blocks uncovered during excavation of stormwater outfall 002 on 10/13/1989.	VOCs, metals, PCBs			Yes			Collect soil sample at location of former excavation - one soil boring, location marked with GPS and wooden stake.
	Underground Pipe	114	Underground pipe leak from the chrome collection system btwn. Pumphouse #2 and Road #3 stormwater outfall	Chrome was detected at the WWTP equalization tank, positive results for chrome @ SW outfall at Road 3, yellow water was discovered coming from ground at several locations w/ 60 foot area east of cooling towers #7-1.	Chrome	Results at WWTP and yellow water in manhole.		Yes			Four locations 114-1 through 114-4. Locations marked with GPS and wooden stakes.
47	Pumphouse #1	113	Pumphouse #1	Pumphouse I analytical results	Pump house# 1	Sampled for VOAs and PCBs	Found residual VOCs and BDL or low PBs - .002 to <.0002 mg/L	Yes			Three borings: 113-1 to 113-3, locations marked with GPS and wooden stakes; details of borings on Figure.
48	General Sewers	109	General Sewers.	General Sewers.	VOCs, metals, PCBs		N/A	Yes			Six boring locations per Delphi - one boring SE of Bldg. 7A; one boring SE of Bldg. 12; one boring SE of Bldg 8; one boring btwn Bldgs. 8 and 6; and two borings SE of Bldg. 9's SE corner: GS-A 150'S of SE corner of Bldg. #7A; GS-B 40'E and 55'S of SE corner of Bldg. 12; GS-C 120'E and 225'S of SE corner of Bldg. 8; GS-D 30'E and 40'N of NE corner of Bldg. 8; GS-E 45'E and 50'S of SE corner of Bldg. 9; GS-F 80'E and 130'S of SE corner of Bldg. 9



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49	WWTP	115	Northern area of WWTP	Acid Tank	Acids			No			General soil investigation in area with large wastewater treatment tanks. One soil boring and temporary monitoring well.
	WWTP	115	Eastern-central area of WWTP	Acid tank and fuel oil tank	Acids, VOCs			Yes			One soil boring near existing diesel and acid ASTs - location to be marked in the field.
	WWTP	115	Chrome tank had a pinhole leak.	Chrome tank had a pinhole leak.	Chromium			Yes			One soil boring at reported location of leak; location to be marked in the field.
	WWTP		Northern area of WWTP	Northern area of WWTP- historical wastewater lagoon				No			Closed under oversight of NYSDEC - no further action.
50	West side of Facility		Associated with WWTP- west side of Lockport facility	Unlined drying beds for drying WWTP sludge. Closure conducted under consent order w/NYSDEC. Removed off state registry in 1996.				No			RK to provide CF with sampling data from consent order. QA/QC samples only.

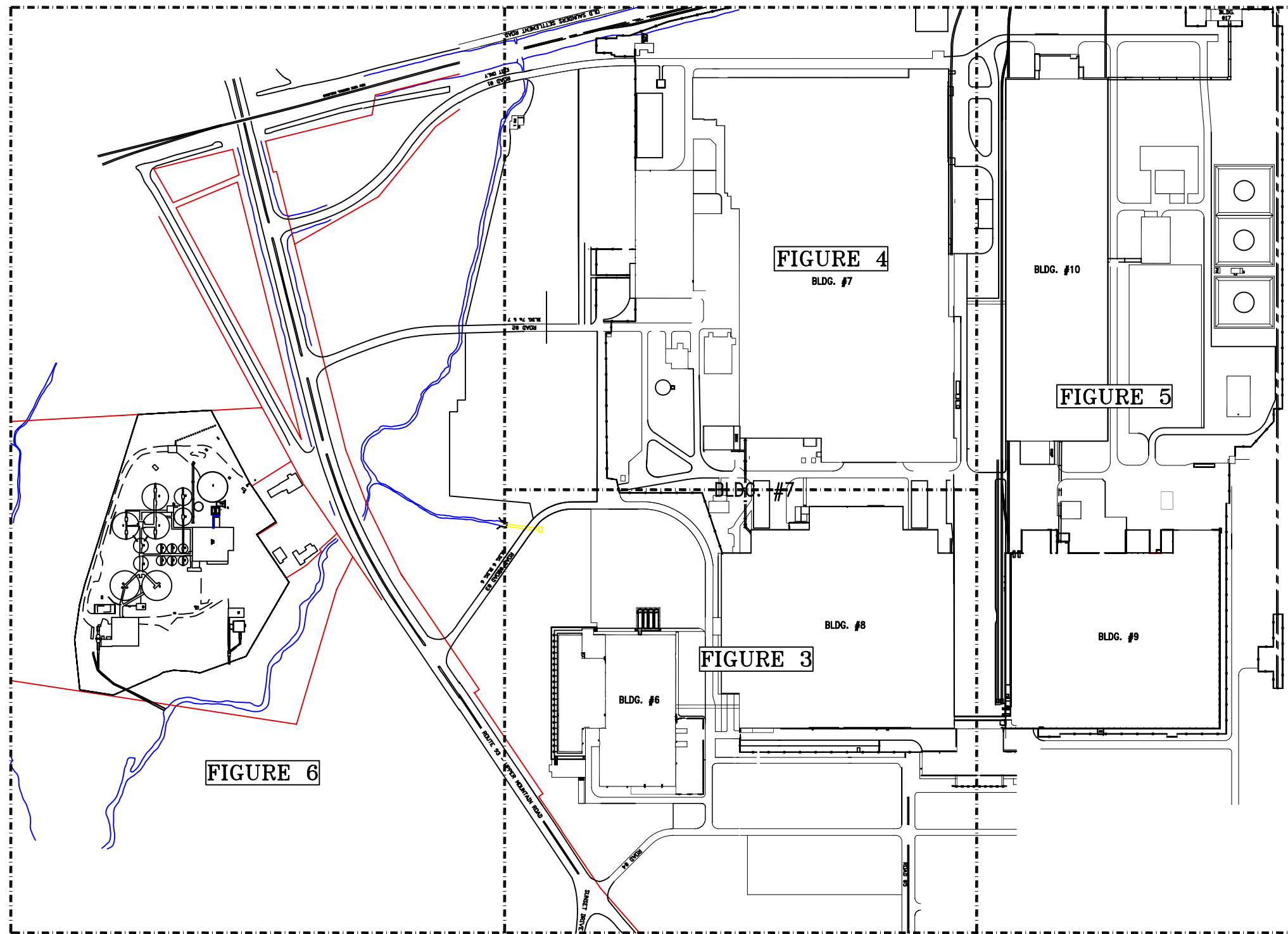
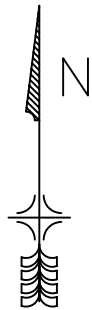


5788 Widewaters Parkway, Dewitt, NY 13214

Site Location Map  
 200 Upper Mountain Road  
 Lockport, New York

Figure

FIGURE 2 - 2006 PHASE II WORK PLAN  
 LOCKPORT, NEW YORK FACILITY  
 SITE PLAN  
 ENVIRONMENTAL RESOURCES MANAGEMENT



LEGEND

--- DIVISIONS BETWEEN AREAS OF INTEREST

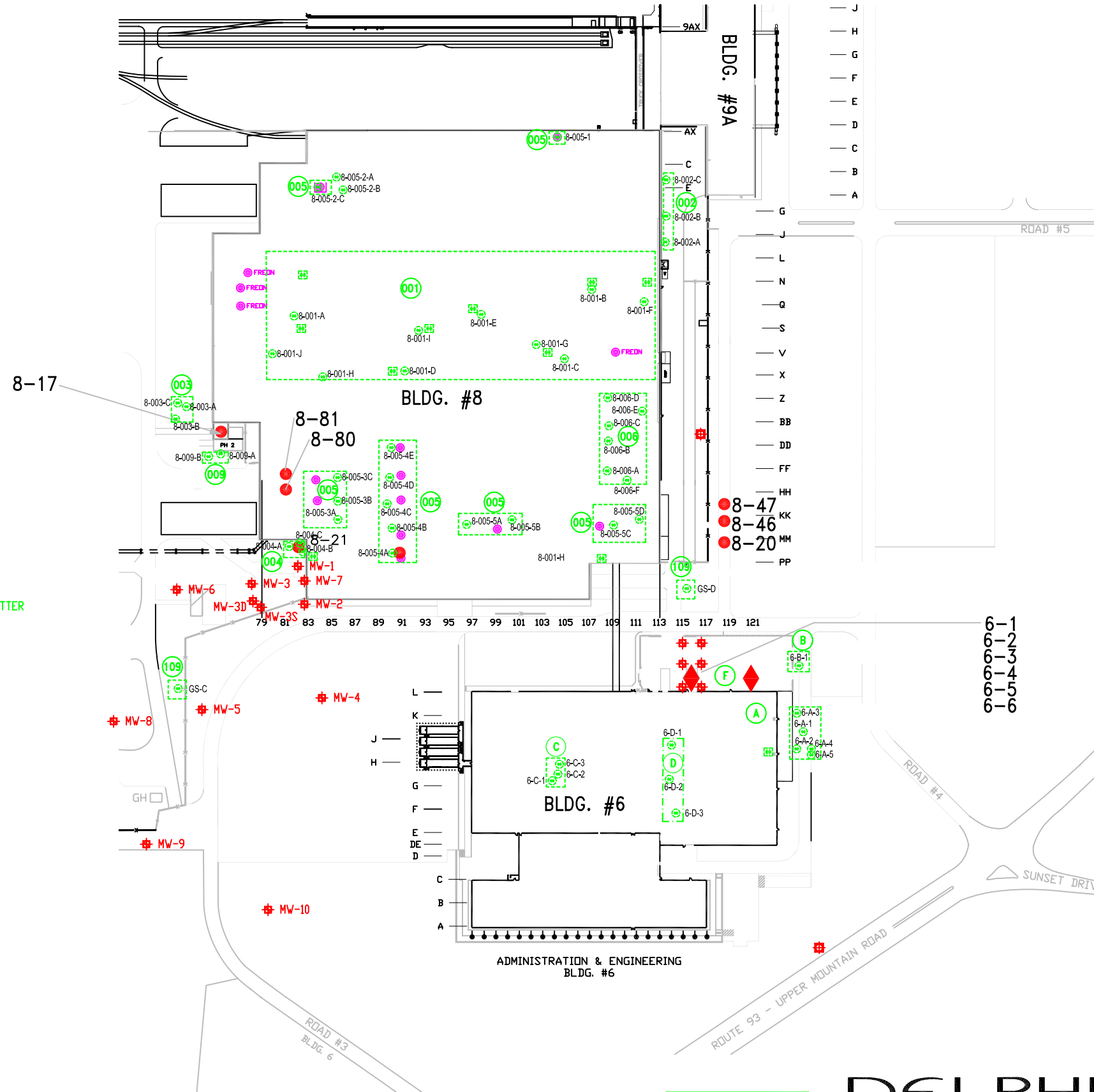
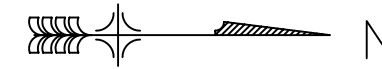
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**DRAFT FIGURE 3 – 2006 PHASE II WORK PLAN  
 LOCKPORT, NEW YORK FACILITY  
 AREAS OF INTEREST BUILDINGS #6 AND #8  
 ENVIRONMENTAL RESOURCES MANAGEMENT**



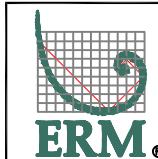
- LEGEND**
- 114 AREA OF INTEREST ID NUMBER OR LETTER
  - AREA OF INTEREST
  - NO FURTHER INVESTIGATION
  - BORINGS UNLESS NOTED
  - CHROME SUMP
  - MONITORING WELL PROPOSED (MWP)
  - MONITORING WELL
  - FORMER DEGREASER LOCATIONS
  - DEGREASER WITH SEPARATOR PIT
  - ABOVEGROUND OIL STORAGE TANK
  - UNDERGROUND FUEL STORAGE TANK

UNDERGROUND FUEL STORAGE TANKS		
TANK NO.	SUBSTANCE STORED	TANK CAPACITY (GAL.)
6-1	DIESEL FUEL	500
6-2	HIGHER UNLEADED GASOLINE	5,000
6-3	HIGHER UNLEADED GASOLINE	5,000
6-4	HIGHER UNLEADED GASOLINE	8,000
6-5	HIGHER UNLEADED GASOLINE	8,000
6-6	HIGHER UNLEADED GASOLINE	3,000

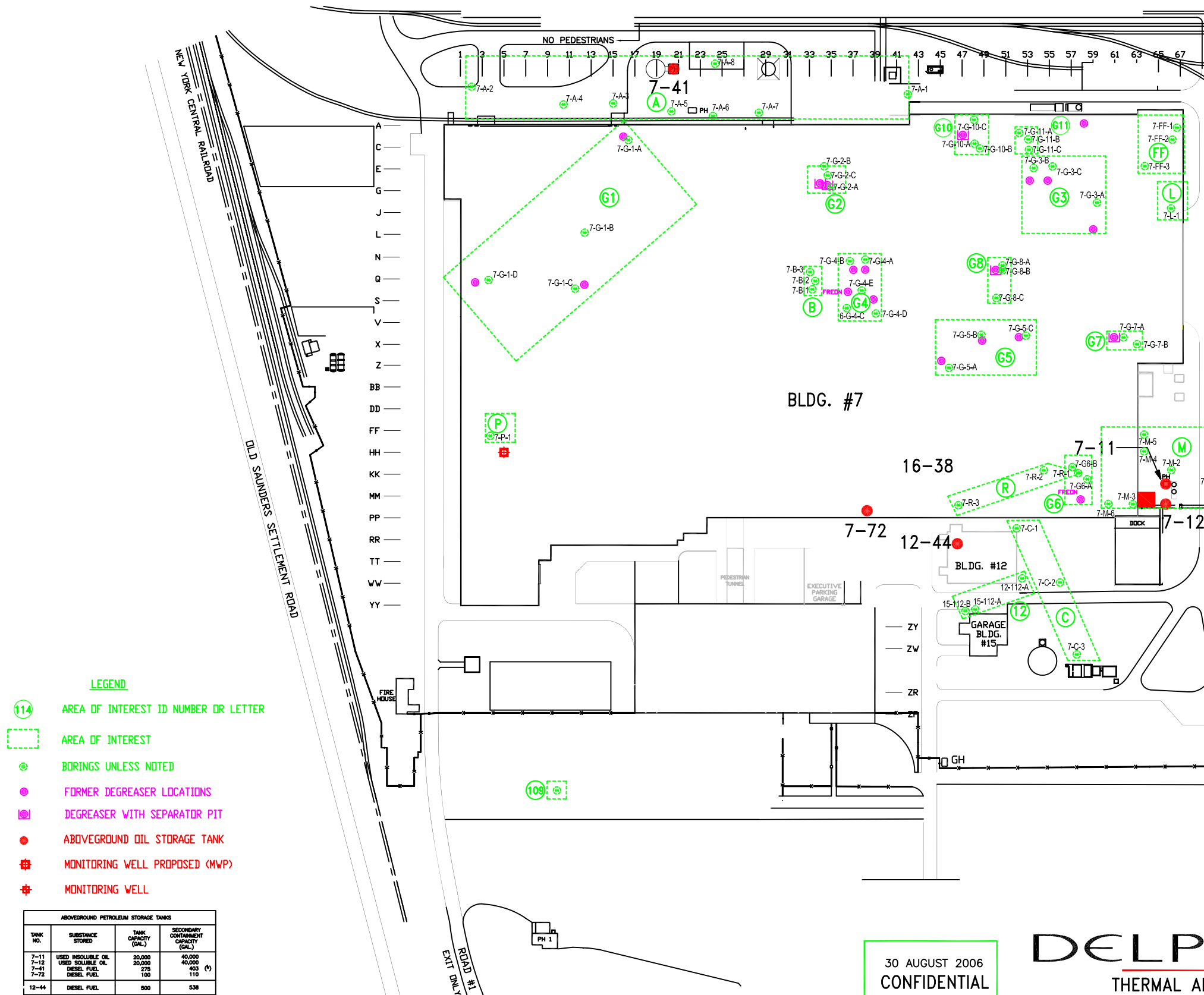
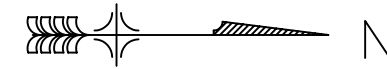
ABOVEGROUND PETROLEUM STORAGE TANKS			
TANK NO.	SUBSTANCE STORED	TANK CAPACITY (GAL.)	SECONDARY CONTAINMENT CAPACITY (GAL.)
13-29	DIESEL FUEL	5,000	7,000

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**DRAFT FIGURE 4 - 2006 PHASE II WORK PLAN  
 LOCKPORT, NEW YORK FACILITY  
 AREAS OF INTEREST BUILDINGS #7 AND WEST COURTYARD  
 ENVIRONMENTAL RESOURCES MANAGEMENT**



- LEGEND**
- 114 AREA OF INTEREST ID NUMBER OR LETTER
  - AREA OF INTEREST
  - 109 BORINGS UNLESS NOTED
  - FORMER DEGREASER LOCATIONS
  - ⊗ DEGREASER WITH SEPARATOR PIT
  - ABOVEGROUND OIL STORAGE TANK
  - ⊗ MONITORING WELL PROPOSED (MWP)
  - ⊕ MONITORING WELL

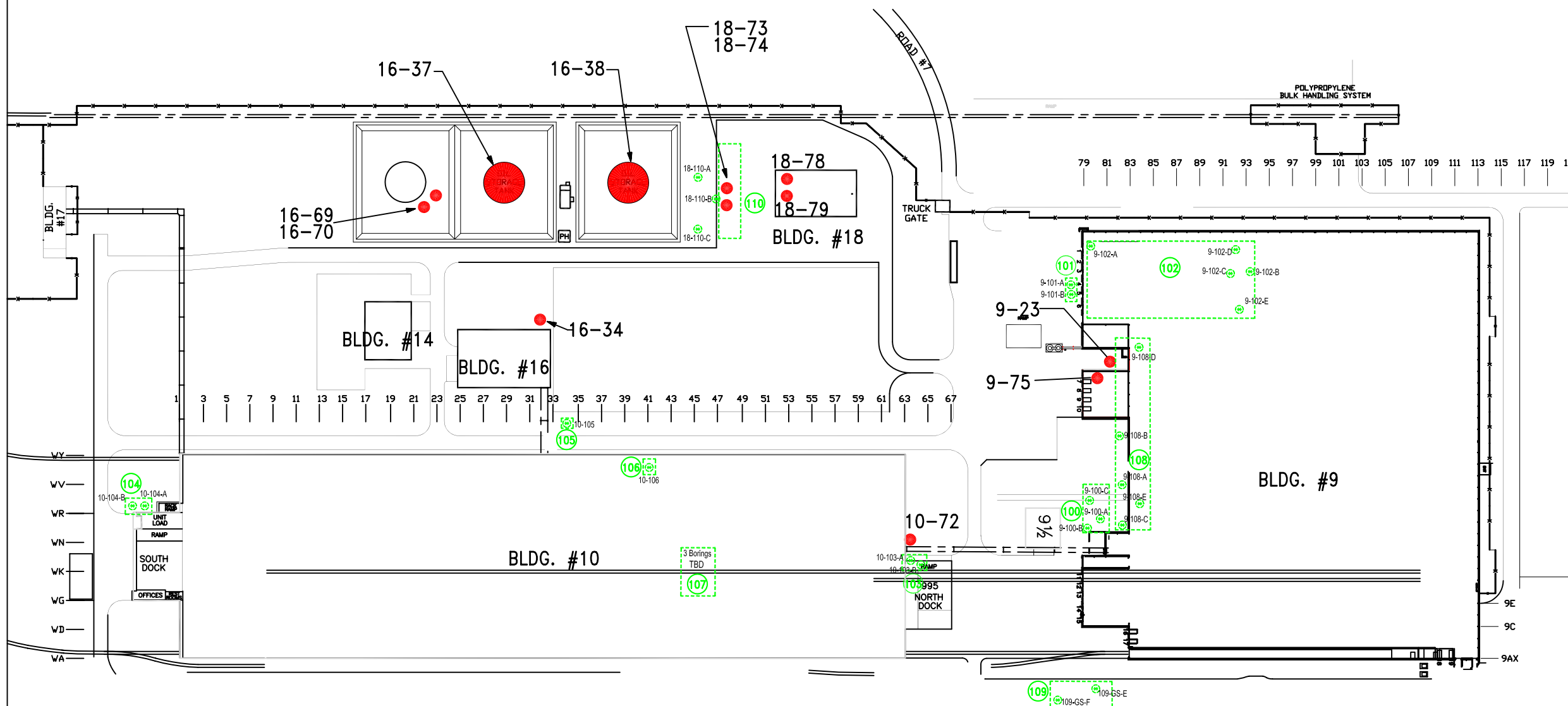
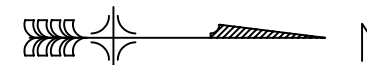
ABOVEGROUND PETROLEUM STORAGE TANKS			
TANK NO.	SUBSTANCE STORED	TANK CAPACITY (GAL.)	SECONDARY CONTINGENCY CAPACITY (GAL.)
7-11	USED INSOLUBLE OIL	20,000	40,000
7-12	USED SOLUBLE OIL	20,000	40,000
7-41	DIESEL FUEL	275	403
7-72	DIESEL FUEL	100	110
12-44	DIESEL FUEL	500	538

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DRAFT FIGURE 5 - 2006 PHASE II WORK PLAN  
 LOCKPORT, NEW YORK FACILITY  
 AREAS OF INTEREST BUILDINGS #9 AND #10  
 ENVIRONMENTAL RESOURCES MANAGEMENT



- LEGEND**
- Ⓜ AREA OF INTEREST ID NUMBER OR LETTER
  - AREA OF INTEREST
  - ⊕ BORINGS UNLESS NOTED
  - ABOVEGROUND OIL STORAGE TANK
  - TBD TO BE DETERMINED (BORING LOCATIONS)
  - \* AOI DD TO BE LOCATED ON MAP AT LATER DATE

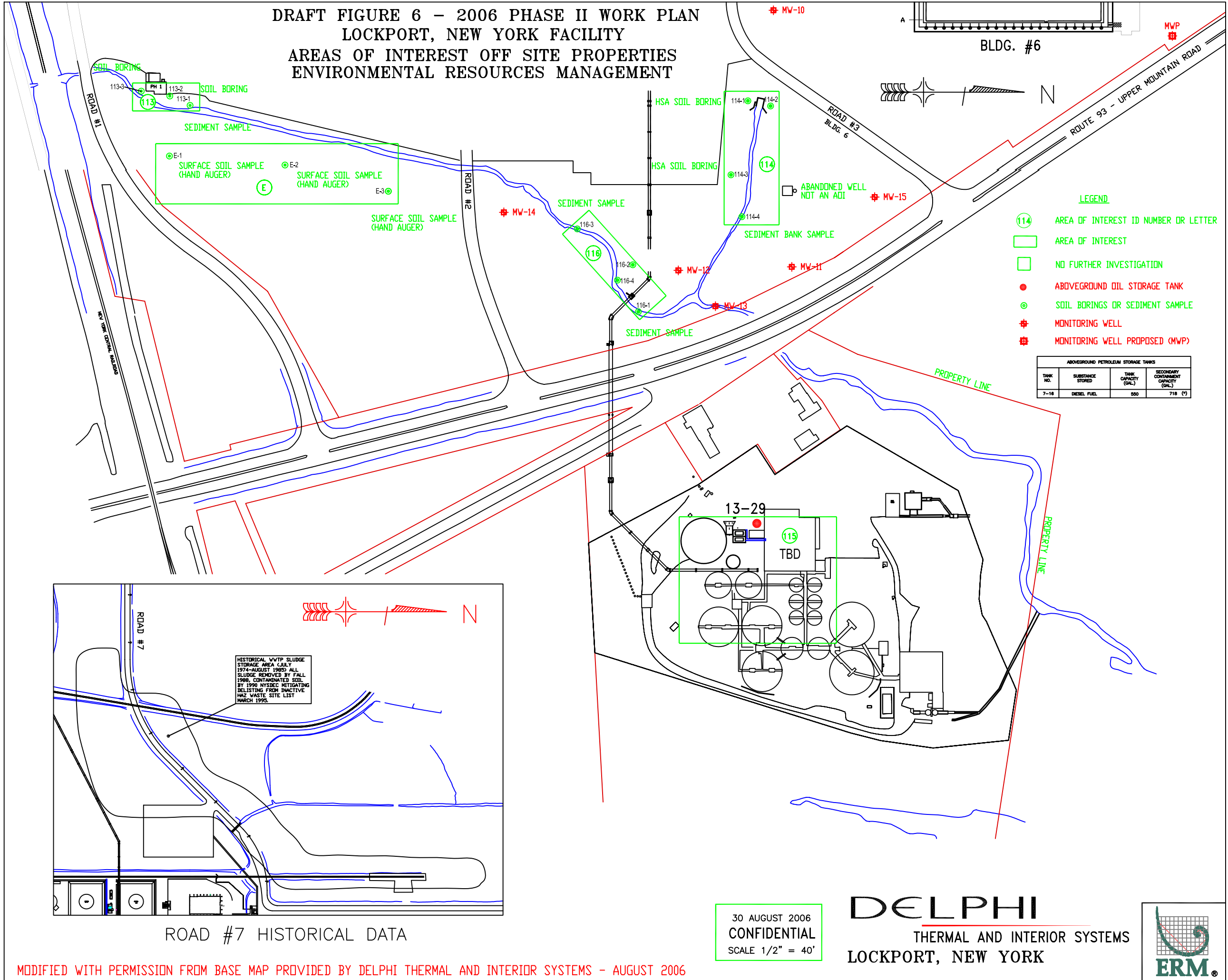
ABOVEGROUND PETROLEUM STORAGE TANKS			
TANK NO.	SUBSTANCE STORED	TANK CAPACITY (GAL.)	SECONDARY CONTAINMENT CAPACITY (GAL.)
9-23	DIESEL FUEL	500	22,508
9-75	FUEL OIL NO.2	20,000	22,508
10-72	DIESEL FUEL	300	(**)
16-34	DIESEL FUEL	500	781
16-37	FUEL OIL NO.2	1,250,000	1,413,800
16-38	FUEL OIL NO.2	1,250,000	1,413,800
16-69	DIESEL FUEL	500	600
16-70	DIESEL FUEL	500	600
18-73	DIESEL FUEL	2,000	(**)
18-74	UNLEADED GASOLINE	2,000	(**)
18-78	HYDRAULIC OIL	250	300
18-79	MOTOR OIL	250	300

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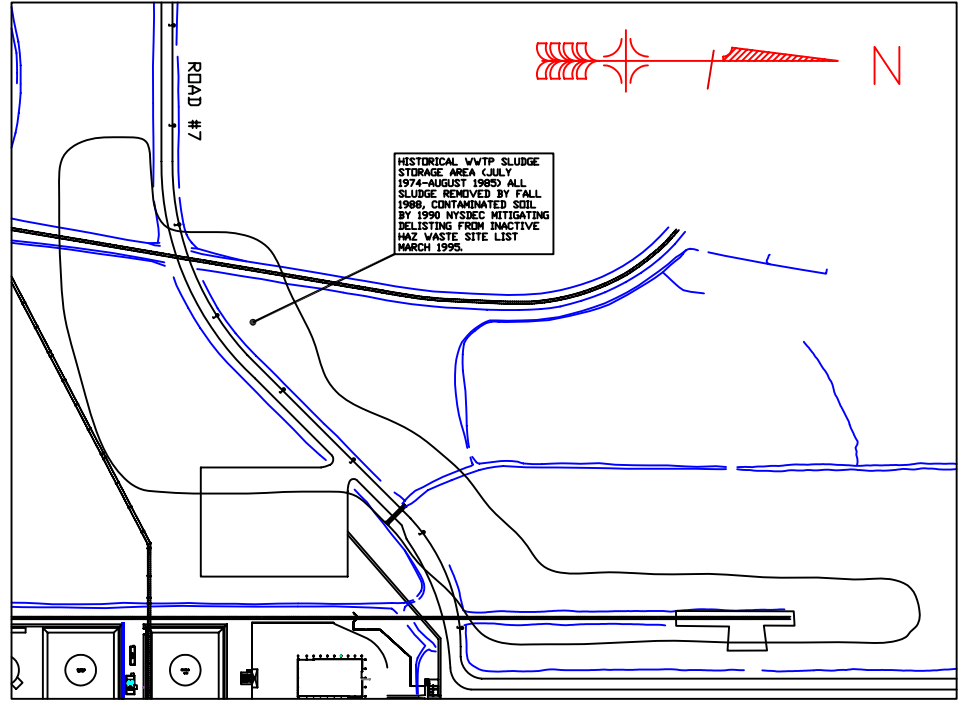


**DRAFT FIGURE 6 – 2006 PHASE II WORK PLAN  
 LOCKPORT, NEW YORK FACILITY  
 AREAS OF INTEREST OFF SITE PROPERTIES  
 ENVIRONMENTAL RESOURCES MANAGEMENT**



- LEGEND**
- (114) AREA OF INTEREST ID NUMBER OR LETTER
  - [ ] AREA OF INTEREST
  - [ ] NO FURTHER INVESTIGATION
  - ABOVEGROUND OIL STORAGE TANK
  - SOIL BORINGS OR SEDIMENT SAMPLE
  - ⊕ MONITORING WELL
  - ⊕ MWP MONITORING WELL PROPOSED (MWP)

ABOVEGROUND PETROLEUM STORAGE TANKS			
TANK NO.	SUBSTANCE STORED	TANK CAPACITY (GAL.)	SECONDARY CONTAINMENT CAPACITY (GAL.)
7-16	DIESEL FUEL	500	718 (*)



ROAD #7 HISTORICAL DATA

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