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Re: Revised Storm Sewer Sampling Work Plan
BCP Sites # C932138, C932139, C932140
GM Components Holdings
200 Upper Mountain Road
Lockport, NY 14094

Dear Glenn:

On behalf of GM Components Holdings (GMCH), GZA GeoEnvironmental of New York (GZA) has prepared this revised Work Plan to conduct storm sewer sampling activities at the GMCH Lockport facility located at 200 Upper Mountain Road, Lockport, New York. Storm water data provided for Outfalls D002 and D003 (see Figure 1) in the Brownfield Cleanup Program (BCP) Remedial Investigation Reports (RIR; Haley & Aldrich/GZA, November 2011) for Buildings 7, 8 and 10 indicated that chlorinated VOCs are present in the storm water discharge from the GMCH Facility. It is possible that VOC impacted groundwater may be infiltrating the storm sewer system at locations where and when the storm sewer piping is present at or below the groundwater table.

The DRAFT Remedial Work Plans (RWPs; H&A/GZA, December 2011) submitted for BCP Sites Building 7, 8 and 10 proposed conducting an assessment of potential groundwater infiltration into the storm sewer system and to take corrective measures as necessary. This revised work plan has been developed to perform storm sewer sampling proposed in the DRAFT RWPs and address NYSDEC comments received in a letter dated August 2, 2012 regarding the initial work plan submitted.

SCOPE OF WORK

An investigation of the storm sewer system will be conducted to determine if VOC-impacted groundwater present on-site is the source of the VOCs identified in the storm sewer discharge. This investigation will be conducted facility-wide to identify potential location(s) of infiltration. The investigation will initially involve water sample collection from select storm sewer structures (catch basins, manholes or piping) where sampling



specific structure(s) may provide information to assess potential infiltration locations and/or exclude portions of the storm sewer system as an area of concern. The investigation will not be conducted when significant storm water runoff is being generated from snow melt or spring rains (March through May).

Two sample rounds will be conducted as part of the storm sewer investigation. One sampling event will occur under dry or drought-like conditions when the groundwater elevations may be below the elevations of the storm sewer system piping. The second sampling event will occur when groundwater elevations are at or above the storm sewer piping elevations. Groundwater elevations will be measured at select monitoring wells throughout the GMCH facility to compare the elevation of the groundwater table versus the storm sewer piping elevations. If it is determined that groundwater elevations are below the storm sewer pipe elevations (due to the dry summer conditions in 2012), the second sampling event will be conducted when groundwater elevations increase to a level consistent with or above the storm sewer elevations based on groundwater elevation measurements.

Fifteen (15) locations have been selected for the initial sampling as shown on Figure 1. Observations of the structures being sampled will be made and recorded (i.e., sheen observed, organic vapor meter readings, flow within the structure, pipe orientation, etc.).

The storm sewer structure sampling will consist of placing a polyethylene dip cup into the selected storm sewer structure to collect samples for analysis. Samples will be collected for VOCs via EPA Method 8260 Target Compound List (TCL) and Total Oil and Grease (O&G) via EPA Method 1664a. O&G samples are being collected to help assess the source of the sheen that has been periodically observed at Outfall D002.

Additionally, one water sample for VOC analysis via EPA Method 8260 TCL will be collected from the potable water supply at the Site via a sink faucet or water spigot. This VOC data will be used to help determine if potable water makes up some or all of the flow present in the storm sewer system under dry weather or drought-like conditions. Untreated potable water is used in the fire suppression system throughout the facility. Leaks from the underground portions of the fire suppression system may be infiltrating into the storm sewer system.

Based on the results of these initial samples an assessment will be made of the conditions under which the samples were collected and evaluated to assess if additional samples may be warranted or if a camera survey may be conducted to assess the interior of the piping identified as a potential concern.

REPORTING

If it is determined that groundwater is infiltrating the storm sewer and the location(s) of the infiltration(s) are identified, a remedial plan will be developed to address the infiltration and be provided to NYSDEC for review and approval. The activities conducted as part of



the storm sewer investigation and remedial action, if deemed necessary, will be summarized in a storm sewer investigation report for submittal to the Department as part of the periodic reporting conducted in compliance with the BCAs for the facility.

If you need additional information or would like to discuss the project, please contact Jim Hartnett (GM Project Manager) at (315) 463-2391 or Chris Boron (GZA Project Manager) at (716) 844-7046.

Respectfully,

GZA GeoEnvironmental of New York

A handwritten signature in blue ink that reads "Chris Boron".

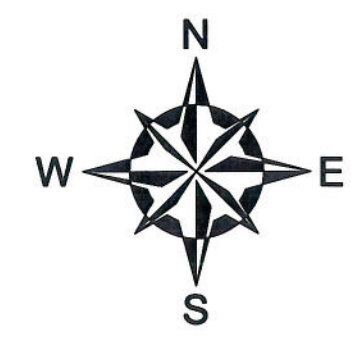
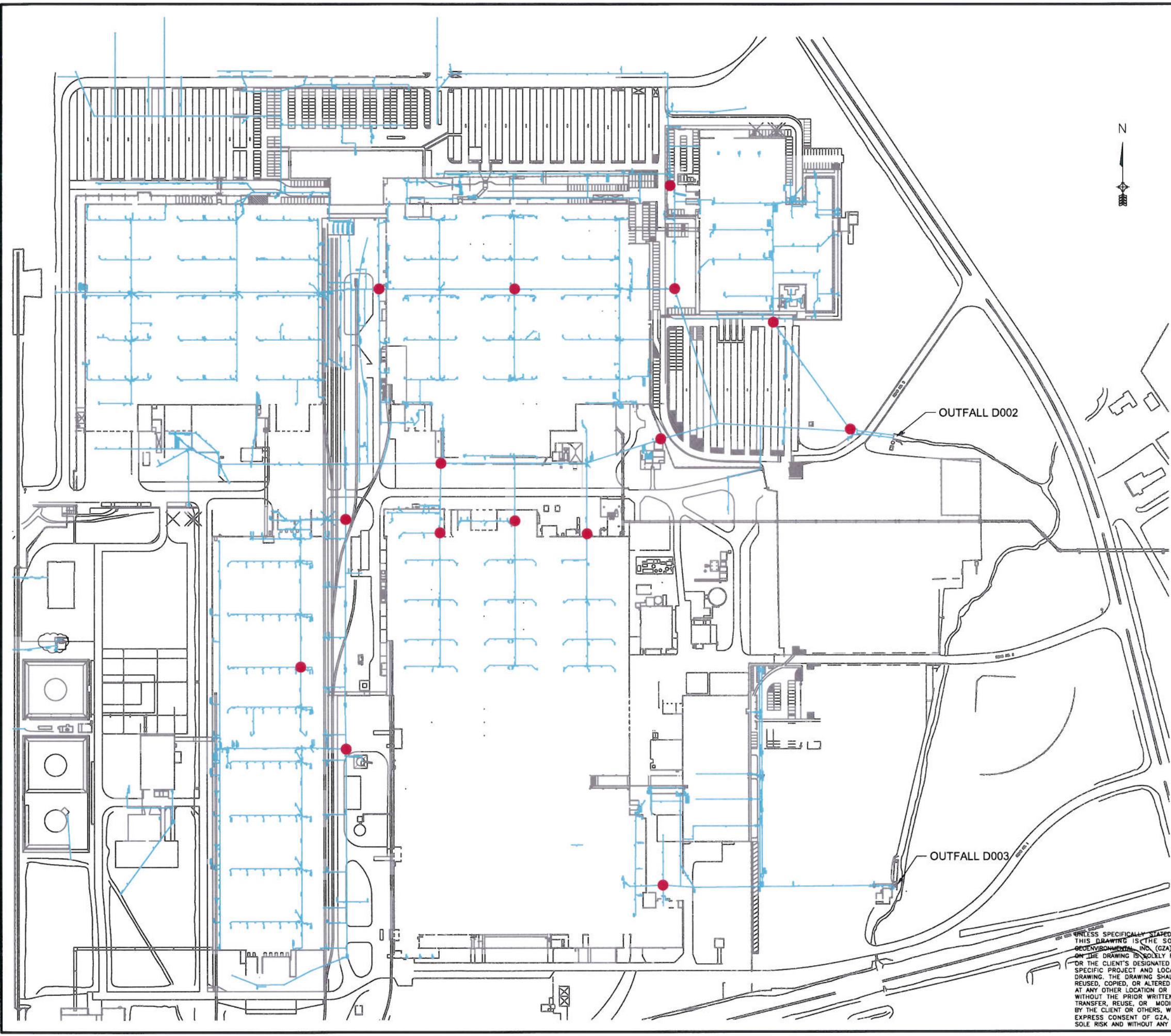
Christopher Boron
Senior Project Manager

A handwritten signature in blue ink that reads "Bart A. Klettke".

Bart A. Klettke, P. E.
Associate Principal

Cc: James Hartnett (GM, electronic copy)
Roy Knapp (GMCH, electronic copy)
Hillie LaDue (GMCH, electronic copy)
Denis Conley (Haley & Aldrich, electronic copy)

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LEGEND:

- LOCATION OF STORM SEWER
- APPROXIMATE STORM SEWER SAMPLING POINT LOCATION (15 TOTAL)



NO.	ISSUE/DESCRIPTION	BY	DATE
LOCKPORT FACILITY 200 UPPER MOUNTAIN ROAD LOCKPORT, NEW YORK			
SITE WIDE STORM SEWER INVESTIGATION WORK PLAN			
PREPARED BY: GZA GeoEnvironmental of N.Y. Engineers and Scientists 535 WASHINGTON STREET 11th FLOOR BUFFALO, NEW YORK 14203 (716) 885-2300		PREPARED FOR: GM COMPONENTS HOLDINGS, LLC	
PROJ MGR: CZB DESIGNED BY: DATE: JULY 2012	REVIEWED BY: DRAWN BY: DEW PROJECT NO.: 21.0056456.00	CHECKED BY: SCALE: AS SHOWN REVISION NO.	FIGURE 1

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