

PERIODIC REVIEW REPORT

For

300-320 SCAJ LLC
5102 Donnington Road
Clarence, New York

Site

Saginaw – Buffalo Site
Site Number 915152
320 Scajaquada Street
Buffalo, New York

Dates Covered by Report
August 31, 2024 to August 31, 2025

Prepared by:



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Section 1

NEU-VELLE LLC

Summary

1.0 Summary

NEU-VELLE LLC (NEU-VELLE) has prepared this Site Management (SM) Periodic Review Report (PRR) for the Saginaw-Buffalo Site (Site) located at 320 Scjacuada Street in the City of Buffalo, Erie County. The Site is defined as the former Parking Lot #4 associated with the former General Motors and American Axle & Manufacturing (AAM) facility that manufactured axles and drive-train components for cars and trucks. The Site covers an area of approximately 7.248 acres (SBL Parcel No. 101.24-1-3.1) and is included in the New York Registry of Inactive Hazardous Waste Sites (Site No. 915152). Site Institutional Controls (ICs) and Engineering Controls (ECs) were adhered to over the PRR reporting period and continue to be effective in maintaining the remedial objectives. No changes to the established SMP or recommended during the next PRR reporting period.

1.1 Site Summary

General Motors (GM) purchased several parcels in the mid-1960s and constructed Parking Lot #4 which is the current listed Site. In 1989 during a spill cleanup of industrial oil by GM, excavated soil was found to contain Polychlorinated Biphenyls (PCBs). The Site was sold to AAM in 1994 along with the main facility west of the railroad right of way. As part of this conveyance, a deed restriction was placed on the property limiting it for use for industrial purposes only. GM-Saginaw Division, the previous owner of the Site, entered into a Consent Order in 1995 and a Final Site Investigation Report and Engineering Evaluation Report of Alternatives was completed in 1997. A Record of Decision (ROD) was issued in March 1998 which required: 1) The further removal of PCB contaminated soil, water and oil; 2) Maintenance of the pavement to reduce infiltration and provided a barrier to lead contaminated soil; and 3) Long-term monitoring and maintenance. Remediation (the “removal of PCB contaminated soil, water and oil”) of the Site was completed in 1998 and a long-term operation and maintenance (O&M) plan is in place. The property was sold to East Delavan Property, LLC in October 2008.

The paved portion of the Site is currently utilized for training school bus drivers. The remainder of the Site is vacant. The property was purchased by 300-320 SCAJ LLC on February 9, 2023. The monitoring wells were re-surveyed by the previous consultant in

November 2022. In addition, the owner has completed the construction of an addition to the existing building that expanded onto the 320 Scajaquada property and completed demolition of the former wastewater treatment plant in the northwest corner of the 320 Scajaquada property.

1.2 Effectiveness of the Remedial Program

Remediation of the Site was completed between 1998 and 2000 and included:

- Dewatering of an approximately 1-acre area surrounding the former Wastewater Treatment Plant and on-site water treatment, confirmatory effluent sampling and analysis, and batch discharge to the Buffalo Sewer Authority (BSA) sanitary sewer system;
- Excavating fill/soil containing greater than the site cleanup goal of 10 parts per million (ppm) PCBs in the OU1 area, and confirmatory sampling;
- Transporting excavated materials off-site for treatment and disposal;
- Backfilling of the OU1 excavation with clay soil; and
- Paving the excavation area (OU1) and repaving of the OU2 area which was the remainder of the Parking Lot No. 4.

The remedial program was effective and long-term site monitoring requirements were established requiring:

- Pavement inspection and maintenance conducted on an annual basis to ensure that the integrity of the asphalt surface has been maintained;
- Visual inspection of storm sewer manhole covers and manhole risers for structural damage;
- Groundwater sampling of Site monitoring wells for PCBs, Total Lead, and Soluble Lead; and
- Storm sewer sampling from Manhole #2 for PCBs and Total Lead.

Groundwater sampling has been conducted on a biennial basis since 2008 and storm sewer sampling (Manhole #2) on an annual basis. However, due to no flow in Manhole #2, sampling was not conducted during this period.

A requirement for the collection of groundwater samples for per and polyfluoroalkyl substances (PFAS) and 1,4-Dioxane at monitoring wells MW-204 (PFAS only), MW-211, and MW-202 were added to the biennial program in March 2021. The next biennial Groundwater sampling will be conducted in June 2026 and included in the subsequent PRR (2026).

Pavement inspection, storm sewer visual inspection, and storm sewer sampling is conducted on an annual basis.

1.2.1 Progress During the Reporting Period

The cover system is intact and functioning as intended. NEU-VELLE conducted the annual inspection in September 2025 and completed the required inspection form (Appendix A). Photographs of the inspection are included in Appendix A.

Biennial groundwater sampling will be completed in spring/summer 2026. A tabular summary of groundwater and storm sewer sampling results was provided in the previous PRR.

Entire parking area was resurfaced with asphalt during reporting period and vegetation was removed from cracks/edges as requested in the 2023-2024 PRR acceptance letter from NYSDEC.

No groundwater use occurred at the site during this reporting period.

The annual storm sewer sampling from Manhole #2 was not able to be conducted due to the manhole was dry at the time of inspection. Re-sampling will be attempted in spring/summer 2026.

The building expansion and wastewater treatment plant demolition projects were completed during this inspection period and the asphalt cover replaced/repared as required. I closure

report for the treatment plant demolition project will be forward under separate cover. However, there are a few areas that are still under construction (utility installation), which require additional asphalt cover. These areas will be re-inspected once completed to ensure adequate asphalt cover has been placed. Completion of the construction is scheduled to be completed by December 31, 2025 and details of the activities will be included in the CRR which will be submitted by end of first quarter 2026.

1.2.2 Progress to Remedial Objectives for the Site

The Remedial Objectives (ROs) for the Site as established in the March 1998 Record of Decision (ROD) have been achieved and the Site has been in long-term monitoring since 2002. The ROs were as follows:

- To the extent practicable, reduce the potential for human contact with PCBs and lead impacted soils;
- Prevent or greatly reduce the potential for migration of contaminants via surface run-off and on-site drain lines;
- Prevent, to the extent practicable, migration of contaminants at the site to the Scajaquada Creek Drain; and
- To the extent practicable, provide for attainment of SCGs in groundwater.

1.3 Compliance

There were no areas of potential non-compliance identified during the reporting period with the exception of the following.

- There are a few areas that are still under construction (utility installation), which require additional asphalt cover and is scheduled for completion by December 31, 2025.
- Monitoring well MW-201 needs to be decommissioned per CP-43 (to be completed in 2026 prior to the biannual groundwater sampling).
- Monitoring wells MW-202, MW-206, MW-204, MW-211 were covered over with asphalt and need to be relocated, decommissioned, and/or re-installed (to be completed prior to the spring/summer 2026 prior to the spring/summer groundwater sampling).

- Monitoring well MW-210 curb box/cover need to be repaired (to be completed in 2026 prior to the spring/summer groundwater sampling).

1.4 Recommendations

There are no recommended changes to the SMP at this time.

Section 2

NEU-VELLE LLC

Site Overview

2.0 Site Overview

2.1 Site Location

The Site is located at 320 Scjacuada Street in the City of Buffalo, Erie County. The Site is defined as the former Parking Lot #4 associated with the former General Motors and American Axle & Manufacturing (AAM) facility that manufactured axles and drive-train components for cars and trucks. The Site covers an area of approximately 7.248 acres and is included in the New York Registry of Inactive Hazardous Waste Sites (Site No. 915152). Currently the site is used for bus driver training and consists of an asphalt parking area. In addition, there is a portion of the building located on the adjacent property (300 Scjaquada Street) used for bus maintenance which extends onto the 320 Scjacuada property.

2.2 Chronology of the Remedial Program

GM and NYSDEC entered on Order on Consent (Index #B9-0410-92-09), effective February 2, 1995, pursuant to which GM performed an Interim Remedial Measure (IRM) at OU1 and conducted a Site Investigation and Engineering Evaluation of Alternatives in both OU1 and OU2. Based upon the Engineering Evaluation of Alternatives Report prepared by Wehran-New York, Inc. (ENCOR), NYSDEC prepared a Proposed Remedial Action Plan, which it submitted for public comment in February 1998.

NYSDEC selected a final remedial alternative for the Site in a ROD that was issued in March 1998. A Remedial Design (RD) Report was prepared by EMCON to implement the ROD-selected remedial alternatives at the Site. The RD Report was approved by the NYSDEC, and remedial activities were conducted between July 1998 and March 2000.

Section 3

NEU-VELLE LLC

Remedy Performance, Effectiveness, and Protectiveness

3.0 Remedy Performance, Effectiveness, and Protectiveness

The performance, effectiveness, and protectiveness of the remedy are verified through evaluating each of the primary remedial measures.

- The pavement and structural integrity of the sewer system remain in good condition at the Site based on a visual evaluation. The next annual inspection will be conducted in the spring/summer 2026.
- Groundwater samples in accordance with the O&M plan will be collected in the spring/summer 2026. In addition to routine biennial sampling for PCBs, Total Lead, and Soluble Lead, MW-204 will also be sampled for PFAS and MW-211 and MW-202 will also be sampled for PFAS and 1,4-Dioxane.
- Sewer samples in accordance with the O&M plan were not able to be collected due to no flow in the sewer at the time of the inspection. In addition, there was no accumulated sediment in Manhole #2 at the time of the inspection. Sewer samples will be collected in the spring/summer 2026 and the results reported in the next PRR.
- Monitoring well MW-201 decommissioned per CP-43 in spring/summer 2026.
- Monitoring wells MW-202, MW-204, MW-206, and MW-211 to be relocated, decommissioned, and/or re-installed prior to next sampling event scheduled for spring/summer of 2026.
- Monitoring well MW-210 curb box/cover to be repaired prior to next sampling event scheduled for spring/summer of 2026.

Section 4

NEU-VELLE LLC

IC/EC Plan Compliance Report

4.0 IC/EC Plan Compliance Report

4.1 IC/EC Requirements and Compliance

A series of IC's have been developed and are being adhered to at the Site and include:

- Inspection and maintenance of Parking Lot #4.
- Groundwater and sewer monitoring in accordance with the April 2001 O&M
- Manual and subsequent modifications to the O&M Manual in January 2004 and September 2008.

4.1.1 Controls

Engineering controls (ECs) developed for the Site consist of an asphalt pavement cover system.

4.1.2 Status

The Site IC/ECs are all currently active and in force.

4.1.3 Corrective Measures

There are no corrective measures proposed at this time.

4.2 IC/EC Certification

The IC/EC certifications are provided in Appendix B.

Section 5

NEU-VELLE LLC

Monitoring Plan Compliance Report

5.0 Monitoring Plan Compliance Report

5.1 Monitoring Plan Compliance Report

Routine Site Monitoring includes annual pavement inspection, annual visual inspection of sewer structure integrity, annual storm sewer sample collection, biennial groundwater sample collection, and periodic certification.

5.2 Monitoring Completed During Reporting Period

NEU-VELLE conducted the annual inspection on September 3, 2025 and completed the required inspection form (Appendix A). The cover system remains in good condition with minor repairs required due to new construction activities.

Groundwater sampling was not required to be collected during this reporting period. The next round of groundwater sampling is scheduled for spring/summer of 2026.

Storm sewer sampling from Manhole #2 for PCBs and Total Lead was not conducted during this monitoring period due to no flow in manhole.

There were no emergencies or unforeseen failures of established ECs that would require non-routine inspections.

5.3 Monitoring Deficiencies

No monitoring deficiencies were noted during the reporting period.

5.4 Conclusions and Recommendations for Changes

There are no recommendations for changes at this time.

Section 6

NEU-VELLE LLC

Operation & Maintenance (O&M) Plan Compliance Report

6.0 Operation & Maintenance (O&M) Plan Compliance Report

The Site remedy does not rely on any mechanical systems to protect public health and the environment; therefore, an O&M Plan Compliance Report is not applicable to this PRR.

Section 7

NEU-VELLE LLC

Overall PRR Conclusions and Recommendations

7.0 Overall PRR Conclusions and Recommendations

Site IC/ECs remain in place and effective in maintaining the remedial objectives. No changes to the established SMP are recommended during the next PRR reporting period.

Appendix A

NEU-VELLE LLC

Annual Site Wide Inspection Forms and Photographs

ANNUAL INSPECTION FORM

Inspection Date: 9/3/25

Inspected By: Albert G. Lyons, Jr. (NEU-VELLE LLC)

PAVEMENT (Identify any damaged areas on site sketch)

1. Cracked Areas	Yes _____	No <u> x </u>
2. Settled Areas	Yes _____	No <u> x </u>
3. Potholes	Yes _____	No <u> x </u>
4. Heaving	Yes _____	No <u> x </u>
5. Plow Damage	Yes _____	No <u> x </u>
6. Drainage	Good <u> x </u>	Poor _____

Explain:

7. Condition of Surface Sealing	Good <u> x </u>	Poor _____
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Explain: Surface is in good condition. Some areas were milled and require top coat.

STORM SEWERS

1. Condition of Manhole Risers	Good <u> x </u>	Poor _____
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Explain:

2. Sediment in Main	None <u> x </u>	Avg (1-4") _____	Avg (>4") _____
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Comments: No sediment visible in MH#2. No flow.

MONITORING WELLS

	MW-1	MW-5	MW-201	MW-202	MW-203	MW-204	MW-205	MW-206	MW-208	MW-209	MW-210	MW-211
Is protective casing in good condition?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes	No
Is flush mount casing in good condition?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes	No
Are casing labeled?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes	No
Is concrete surface seal in good condition?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	No	No
Is protected pad in good condition?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	No	No
Are locks present?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes	No
Are lock in good condition?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes	No
Is riser in good condition?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes	No
Are J-plugs present?	Yes	Yes	No	No	Yes	No	Yes	No	Yes	Yes	Yes	No

Appendix A – Annual Inspection Photolog

Annual Inspection 2025 PRR	Photo Date: 9/3/2025	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 1 Direction Photo Taken: Looking northwest		
Description: Typical. Pavement in good condition.		
Annual Inspection 2025 PRR	Photo Date: 9/3/2025	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 2 Direction Photo Taken: Looking southwest.		
Description: Typical. Pavement in good condition.		

Appendix A – Annual Inspection Photolog

Annual Inspection 2025 PRR	Photo Date: 9/3/2025	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 3		
Direction Photo Taken: Looking northeast		
Description: Typical. Milling conducted and top coat is required.		
Annual Inspection 2025 PRR	Photo Date: 9/3/2025	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 4		
Direction Photo Taken: Looking south.		
Description: Typical. Pavement in good condition.		

Appendix A – Annual Inspection Photolog

Annual Inspection 2025 PRR	Photo Date: 9/3/2025	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 5		
Direction Photo Taken: Looking west		
Description: Typical. Pavement in good condition. Area in foreground is location of former wastewater treatment plant.		
Annual Inspection 2025 PRR	Photo Date: 9/3/2025	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 6		
Direction Photo Taken: Looking south.		
Description: Typical. Pavement in good condition.		

Appendix A – Annual Inspection Photolog

Annual Inspection 2025 PRR	Photo Date: 10/13/25	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 7		
Direction Photo Taken: Looking west		
Description: Prior location of monitoring wells MW-204 and Mw-211 covered by new asphalt		
Annual Inspection 2025 PRR	Photo Date: 10/13.25	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 8		
Direction Photo Taken: Looking West		
Description: Monitoring well MW-2210 damaged curb box with no cover		

Appendix A – Annual Inspection Photolog

Annual Inspection 2025 PRR	Photo Date: 10/13/25	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 9		
Direction Photo Taken: Looking North		
Description: Monitoring Well MW-202 covered by new asphalt		
Annual Inspection 2025 PRR	Photo Date: 10/13/25	Project: Saginaw – Buffalo Site Site No. 915152
Photo No. 10		
Direction Photo Taken: Looking north		
Description: Monitoring Well MW-206 covered by new asphalt		

Appendix B

NEU-VELLE LLC

Institutional Control/ Engineering Control (IC/EC) Certification



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site Details		Box 1
Site No.	915152	
Site Name Saginaw - Buffalo		
Site Address: 320 Scajaquada St.		Zip Code: 14215
City/Town: Buffalo		
County: Erie		
Site Acreage: 7.248		
Reporting Period: August 31, 2024 to August 31, 2025		
		YES NO
1. Is the information above correct?		☒ ☐
If NO, include handwritten above or on a separate sheet.		
2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period?		☐ ☒
3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))?		☐ ☒
4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? <i>Permits will be discussed in forthcoming CRR</i>		☒
If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form.		
5. Is the site currently undergoing development? <i>UTILITY WORK / Asphalt</i>		☒

Box 2		
		YES NO
6. Is the current site use consistent with the use(s) listed below? Industrial		☒ ☐
7. Are all ICs in place and functioning as designed?		☒ ☐

**IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

SITE NO. 915152

Box 3

Description of Institutional Controls

Parcel

Owner

Institutional Control

101.24-1-3.1

300-320 SCAJ LLC

Monitoring Plan
O&M Plan

i) Inspection and Maintenance of Parking Lot #4.

ii) Groundwater and Sewer Monitoring according to the Operation and Maintenance Manual, dated April 2, 2001.

iii) Modification to O&M Frequency Dated January 4, 2004.

iv) Modification to O&M Frequency Dated September 22, 2008.

Box 4

Description of Engineering Controls

Parcel

Engineering Control

101.24-1-3.1

Cover System

Asphalt Parking Lot Cover.

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

- a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the Engineering Control certification;
- b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO



2. For each Engineering control listed in Box 4, I certify by checking "YES" below that all of the following statements are true:

- (a) The Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;
- (b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;
- (c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;
- (d) nothing has occurred that would constitute a violation or failure to comply with the Site Management Plan for this Control; and
- (e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO



**IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and
DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.**

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 915152

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons, Jr at Neu-velle LLC
print name 10 Jones Ave
print business address Rochester, NY 14608

am certifying as Owner Representative (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Albert G Lyons Jr
Signature of Owner, Remedial Party or Designated Representative
Rendering Certification

9/19/25
Date

EC CERTIFICATIONS

Box 7

Professional Engineer Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I Albert G. Lyons, Jr at Neu-vette LLC
10 Jones Ave
Rochester, NY 14608
print name print business address

am certifying as a Professional Engineer for the Owner
(Owner or Remedial Party)

Albert G. Lyons, Jr

Signature of Professional Engineer, for the Owner or Remedial Party, Rendering Certification



Stamp
(Required for PE)

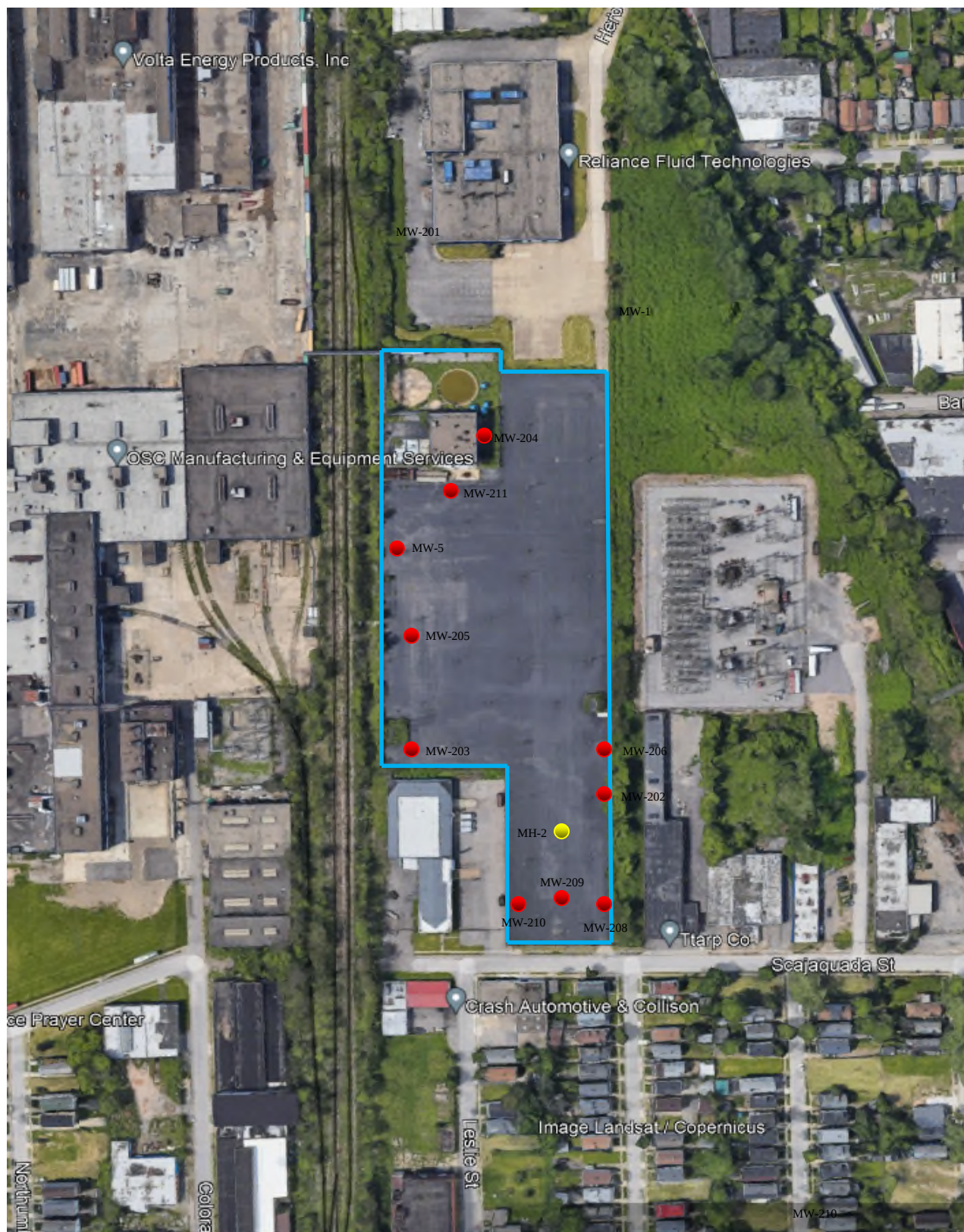
9/19/25

Date

Appendix C

NEU-VELLE LLC

Site Map



Property Boundary —

Monitoring Well ●

Man ●