Delphi Harrison Thermal Systems Site

NIAGARA COUNTY, NEW YORK

Final Engineering Report

NYSDEC Site Number: 9-32-113

Prepared for:

GM Components Holdings, LLC

200 Upper Mountain Rd

Lockport, NY

Prepared by:

GZA GeoEnvironmental of New York

535 Washington Street, 11th Floor

Buffalo, New York

716-685-2300

Revision #	Submitted Date	Summary of Revision	DEC Approval Date
1	3/2/2012	Revisions address NYSDEC comments received 3/1/2012	

March 2012

CERTIFICATIONS

I, Bart A. Klettke, am currently a registered professional engineer licensed by the State of New York; I had primary direct responsibility for implementation of the remedial program activities at the Delphi Harrison Thermal Systems Site No. 9-32-113.

I certify[1] that a program of monitored natural attenuation (MNA), including the development of a contingency plan, is in place as specified by the Record of Decision (ROD) issued by the Department for this Site and that the data submitted to the Department with this Final Engineering Report demonstrates that the remediation requirements of the selected remedy have been or will be achieved in accordance with the time frames, if any, established in the ROD.

I certify that all use restrictions, Institutional Controls, Engineering Controls, and/or any operation and maintenance requirements applicable to the Site are contained in an environmental easement created and recorded pursuant to ECL 71-3605 and that any affected local governments, as defined in ECL 71-3603, have been notified that such easement has been recorded.

I certify that a Site Management Plan has been developed to satisfy the requirements of the ROD issued by the Department for this Site and that such plan has been approved by the Department.

I certify that all data generated in support of this report have been submitted in accordance with the Department's electronic data deliverable and have been accepted by the Department and that all activities described in this report have been performed in accordance with the remedial program and any subsequent changes as agreed to and approved by the Department.

I certify that all documents generated in support of this report have been submitted in accordance with the Division of Environmental Remediation's electronic submission protocols and have been accepted by the Department.

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[1] Certify means to state or declare a professional opinion based on the information or knowledge available at the time the certification is made.

I certify that information and statements in this certification form 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, Bart A. Klettke, of GZA GeoEnvironmental of New York located at 535 Washington Street, Buffalo, New York, am certifying as Owner's Designated Site Representative for the site.

069423	3-6-12	Bart A. Klettke
NYS Professional Engineer #	Date	Signature

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LIST OF ACRONYMS

Acronym	Definition
GMCH	GM Component Holdings, LLC
GZA	GZA GeoEnvironmental of New York
NYSDEC	New York State Department of Environmental Conservation
NYDOH	New York State Department of Health
SMP	Site Management Plan
RAO	Remedial Action Objectives
ROD	Record of Decision
MNA	Monitored Natural Attenuation
VOC	Volatile Organic Compounds
IC/EC	Institutional Controls / Engineering Controls
HASP	Health and Safety Plan
AOC	Area of Concern
OSHA	Occupational Safety and Health Administration
S/MMP	Soil/Materials Management Plan
SWPPP	Stormwater Pollution Prevention Plan
CAMP	Community Action Monitoring Plan
FMG	Field Method Guide
FER	Final Engineering Report
IRM	Interim Remedial Action
CY	Cubic Yard
TCE	Trichloroethylene
PCE	Tetrachloroethylene
QAPP	Quality Assurance Project Plan

FINAL ENGINEERING REPORT

1.0 BACKGROUND AND SITE DESCRIPTION

GMCH entered into a Order on Consent and Administrative Settlement with the New York State Department of Environmental Conservation (NYSDEC) in November 2011, (Index #B9-0553-99-06) to finalize the development and implementation of the Remedial Program for a 22.7-acre portion of the property referred to as the Delphi Harrison Thermal System Site ("Site"), located in the City of Lockport, Niagara County, New York.

The Site is located in the County of Niagara, New York and is identified as a portion of parcel 108.13-1-1 on the Town of Lockport Tax Map # 108.13. The Site is situated on an approximately 22.7-acre area bounded by a Delphi Automotive leased building to the north, the GMCH facility to the south and west and Upper Mountain Road to the east (see Figure 1). The boundaries of the Site are fully described in Appendix A: Survey Map, Metes and Bounds.

It should be noted that the 22.7 acre Site is situated within the 342 acre GMCH Lockport Facility addressed as 200 Upper Mountain Road. The Site, located along the eastern portion of the GMCH Lockport Facility, is shown in Figure 1. Currently, there are no occupied structures or buildings present within the footprint of the Site, rather the majority of the Site is grass covered or used as a parking lot.

A historically used trichloroethylene (TCE) storage tank near Building 8 (see Figure 2) was closed in May 1994. TCE is no longer used at the Site. An underground water line ruptured in the area of the TCE storage tank in October 1994. Workers noted a solvent odor during the excavations to repair the ruptured line. NYSDEC was notified of the release at that time and assigned the incident Spill Number 9410972. Due to the presence of TCE, this project was transferred to the Remediation Unit for follow-up. The presence of TCE in the subsurface was likely related to historical spills and leaks related to the storage and handling of TCE at the manufacturing facility.

Tetrachloroethylene (PCE) was also used as a degreasing solvent at the facility. Use of PCE as a manufacturing solvent was discontinued in 1992, and in 1994, PCE use at the manufacturing facility was discontinued entirely.

Generally, the Remedial Investigation (RI) determined that VOCs of concern that are related to the suspected release of TCE from the former tank include TCE, PCE, cis-1,2-dichloroethene (1,2-DCE), trans-1,2-dichloroethene (1,2-DCE) and vinyl chloride (VC). Other VOCs detected at the Site include xylenes, toluene, ethylbenzene and benzene, which are commonly associated with gasoline spills.

An electronic copy of this FER with all supporting documentation is included as Appendix B.

2.0 SUMMARY OF SITE REMEDY

2.1 Remedial Action Objectives

Based on the results of the Remedial Investigation and Feasibility Study, the Remediation Goals were identified for this Site as stated in Section 6 of the March 2005 Record of Decision (ROD) which states:

> *Goals for the remedial program have been established through the remedy selection process stated in 6 NYCRR Part 375-1.10. At a minimum, the remedy selected must eliminate or mitigate all significant threats to public health and/or the environment presented by the hazardous waste disposed at the site through the proper application of scientific and engineering principals.*
>
> *The remediation goals for this site are to eliminate or reduce to the extent practicable:*
>
> - *exposures of persons at or around the site to direct contact with contaminated subsurface soil, groundwater, or inhalation of organic vapors; and*
> - *the further migration of contaminated bedrock groundwater.*
>
> *Further, the remediation goals for the site include attaining to the extent practicable:*
>
> - *ambient groundwater quality standards.*

2.2 Description of Selected Remedy

The Site was remediated in accordance with the remedy selected by the NYSDEC and presented in a ROD dated March 2005.

The following is a summary of the selected remedy for the Site (as discussed at pages 14-15 in the ROD):

1. Development of a groundwater monitoring program to evaluate the continued effectiveness of Monitored Natural Attenuation (MNA) at the Site. This program will include sampling of select monitoring wells for VOC contaminants of concern and specific natural attenuation indicator parameters. Reporting of the monitoring data will be required on an annual basis, and will include the evaluation of the contaminant trends and discussion of any changes observed in the nature and/or extent of the groundwater contaminant plume.

2. Development of a contingency plan for groundwater control/treatment if natural attenuation processes can no longer be demonstrated or if significant off-site groundwater contamination is observed.

3. Since the remedy results in contamination above unrestricted levels remaining at the Site, a site management plan (SMP) will be developed and implemented. The SMP will include the institutional controls and engineering controls to: (a) address residual contaminated soil that may be excavated from the Site during future redevelopment. The plan will require soil characterization and, where applicable, disposal/reuse in accordance with NYSDEC regulations; (b) evaluate the potential for vapor intrusion for all current Site buildings and any developed on the Site in the future, including provisions for mitigation of any impacts identified; (c) provide for the operation and maintenance of components of the remedy; (d) monitor the groundwater; and (e) identify any use restrictions on Site development or groundwater use.

4. The SMP will require the property owner to provide an Institutional Control/Engineering Control (IC/EC) certification, prepared and submitted by a professional engineer or environmental professional acceptable to the NYSDEC annually or for a period to be approved by the NYSDEC, which will certify that the IC/ECs put in place are unchanged from the previous certification and nothing has occurred that will impair the ability of the control to protect public health or the environment or constitute a violation or failure to comply with any operation and maintenance or soil management plan.

5. Imposition of an IC in the form of an environmental easement that will: (a) require compliance with the approved SMP; (b) limit the use and development of the property to commercial or industrial uses only; (c) restrict use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the Niagara County Department of Health; and (d) require the property owner to complete and submit the IC/EC certification to the NYSDEC.

3.0 INTERIM REMEDIAL MEASURES, OPERABLE UNITS AND REMEDIAL CONTRACTS

The remedy for this Site was performed as a single project, and no interim remedial measures, operable units or separate construction contracts were performed. However, it should be noted that as part of the 1994 spill response, soils impacted with TCE were excavated from a 27 by 22 foot area down to the top of bedrock, about 7.5 feet totaling about 165 cubic yards (cy). Some of the impacted soil could not be removed due to the irregular nature of the bedrock surface. The excavated soil was properly disposed off-site and the excavation was backfilled with clean material.

4.0 DESCRIPTION OF REMEDIAL ACTIONS PERFORMED

A NYSDEC-approved Site Monitoring Plan (SMP) dated October 2011 is in place and no deviations from the SMP are noted to date. Future deviations, if any, will be discussed with NYSDEC and documented in the Periodic Review Report submittal, further discussed in Section 4.6.2 of this FER. The details of the ROD-required monitored natural attenuation (MNA) program and associated contingency plan are set forth in the SMP. The SMP also includes a copy of the required Environmental Easement that was recorded in the Niagara County Clerk's Office on October 6, 2011.

4.1 GOVERNING DOCUMENTS

The remedial elements for the Site are detailed in the October 2011 SMP and specific topics that comprise the SMP are discussed below.

4.1.1 Site Specific Health & Safety Plan (HASP)

All monitoring work performed under this Remedial Program was and will continue to be done in full compliance with governmental requirements, including Site and worker safety requirements mandated by Federal OSHA.

The Health and Safety Plan (HASP) was complied with for all remedial and invasive work performed at the Site. The detailed HASP is included as Appendix C of the SMP.

4.1.2 Quality Assurance Project Plan (QAPP)

The QAPP is included as Appendix G of the NYSDEC approved SMP. The QAPP presents the project scope, objectives, organization, planned activities, sampling procedures, data quality objectives and quality assurance/quality control (QA/QC) procedures associated with the Consent Order executed between the NYSDEC and GMCH in 2011 (Index #B9-0553-99-06; Site #932113).

4.1.3 Construction Quality Assurance Plan (CQAP)

Not applicable as active remediation was not required by the March 2005 ROD.

4.1.4 Soil/Materials Management Plan (S/MMP)

A Soil/Materials Plan (S/MMP) was not prepared nor was required for the remedial activities at the site. However, disturbance and management of subsurface soils in the future will be done in accordance with the Excavation Work Plan that is presented as Appendix A in the SMP.

4.1.5 Storm-Water Pollution Prevention Plan (SWPPP)

Although there was no intrusive (e.g., excavation, construction, etc.) remedial construction activities performed as part of the remedial actions, erosion and sediment controls for all future site excavations or soil disturbance will be performed in conformance with requirements presented in the New York State Guidelines for Urban Erosion and Sediment Control. A detailed discussion of SWPPP requirements in the event of excavation/construction activities is presented in Section A-11 of the Excavation Work Plan in Appendix A of the SMP.

4.1.6 Community Air Monitoring Plan (CAMP)

Community air monitoring will be done in compliance with NYSDEC/NYSDOH requirements and in accordance with Section A-13 of the Excavation Work Plan in Appendix A of the SMP.

4.1.7 Contractors Site Operations Plans (SOPs)

Not applicable as active remediation was not required by the March 2005 ROD.

4.1.8 Community Participation Plan

A Citizen Participation Plan (CPP) was developed for the Site to assure interested and possibly affected public to participate and to provide input on the site activities. This typically includes public officials of many levels including citizen interest groups, commercial interests, individuals associated with the site and the media. These parties were afforded opportunities to be part of the decision making process for this site and were informed about on-site activities through fact sheets and public meetings. The CPP was provided as Appendix E of the NYSDEC approved "Focused Remedial Investigation and Focused Feasibility Study Work Plan" dated April 2001.

4.2 REMEDIAL PROGRAM ELEMENTS

4.2.1 Contractors and Consultants

- GZA GeoEnvironmental of New York – Responsible for conducting the Remedial Investigation and Feasibility Study, development of the SMP and conducting the annual MNA groundwater sampling.
- Earth Dimensions – Responsible for the installation of the groundwater monitoring wells present within the Site.
- Bart A. Klettke (GZA GeoEnvironmental of New York) is the certifying Engineer of Record responsible for the work.

4.2.2 Site Preparation

Because no construction activities were or are planned as part of the remedial actions, there has been no disturbance to the Site. Regardless, where applicable, site preparation issues are detailed in Appendix A (Excavation Work Plan) of the SMP.

4.2.3 General Site Controls

- Site security: GMCH protocol requires visitors and contractors to sign-in with Site security upon arrival. Site security is to be notified in case of any emergency situation is to arise.
- Job site record keeping: Groundwater monitoring and site inspection logs are provided in Appendix E and F, of the SMP, respectively, and submitted annually with the Periodic Review Report as further discussed in Section 4.6.2.
- Equipment decontamination and residual waste management: Equipment decontamination procedures are completed in accordance with the Field Method Guide (FMG) for Equipment Decontamination in Appendix E of the SMP. Purged groundwater and decontamination water are drummed for disposal by GMCH as further discussed in Section 4.3 of this FER.

4.2.4 Nuisance controls

Nuisance Controls (e.g., odors, dust control, rodent, etc.), required for the specific remedial actions, if conducted, are detailed in Sections A-14 through A-16 in Appendix A (Excavation Work Plan) of the SMP.

4.2.5 CAMP results

No intrusive or construction activities were completed as part of the Remedial Program and therefore no field data sheets or air monitoring work was done.

4.2.6 Reporting

A Periodic Review Report will be submitted to the Department annually in January of each year unless a change to the timing or frequency of submittals is approved by NYSDEC. In the event that the Site is subdivided into separate parcels with different ownership, a single Periodic Review Report will be prepared for the reporting period that addresses the Site described in the Environmental Easement. The report will be prepared in accordance with NYSDEC DER-10. Media sampling results will be incorporated into the Periodic Review Report. Detailed specifics of the report are included in the SMP and Annual Inspection report forms are included in electronic format in Appendix F of the SMP.

4.3 CONTAMINATED MATERIALS REMOVAL

No contaminated materials were removed as part of the Remedial Program. However, as discussed in Section 1.2.2 of the SMP, contaminated soils were excavated down to the top of bedrock in the vicinity of the former tank in 1994 in connection with the spill response and properly disposed of off-Site. Specifically, soils impacted with TCE were excavated from a 27 by 22 foot area down to the top of bedrock, about 7.5 feet. Some of the soil could not be removed due to the irregular nature of the bedrock surface. The excavated soil was properly disposed off-site and the excavation was backfilled with clean material.

As part of the Remedial Program, groundwater will be withdrawn for disposal during the monitoring well purging events as part of the annual MNA sampling event. MNA sampling has been conducted at the Site since 2006 and approximately 50 gallons of groundwater is typically withdrawn, containerized in 55-gallon drums and properly disposed of by GMCH. In addition, water used as part of the monitoring equipment decontamination is also placed in the 55-gallon drums. A list of the soil cleanup objectives (SCOs) for the contaminants of concern for this project is provided in Table 1 and the NYSDEC Class GA groundwater criteria are provided in Table 2.

The locations of the monitoring wells sampled as part of the MNA Remedial Program are shown in Figure 3.

4.3.1 Subsurface soil

Not applicable as active remediation was not required by the March 2005 ROD.

4.3.2 Groundwater

Not applicable as active remediation was not required by the March 2005 ROD. However, groundwater withdrawn during the purging/monitoring and equipment decontamination activities as part of the annual MNA monitoring will be containerized. GMCH will stage 55-gallon steel drums at the Site for use in containerizing the groundwater. Drums will be labeled using GMCH tags identifying the contents of the drum and date of generation. GMCH will be responsible for drum removal and proper disposal of the generated waste.

4.3.3 Disposal Details

- The annual MNA groundwater sampling is generally conducted between April and November each year.
- Each annual sampling event generates about 50 gallons of purged groundwater and decontamination water which are placed into 55-gallon drums. The drums will be labeled with the monitoring location from which the purge and decontamination water are generated.
- Groundwater will either be discharged to the City of Lockport Waste Water Treatment Facility via the process sewer located at Pump House 2 or sent off-site to EQ's Michigan Disposal Waste Treatment Plant, in Belleville, Michigan. Criteria to determine the disposal is discussed below.
- The analytical results from the groundwater sampling will be compared to the toxicity characteristic leaching procedure (TCLP) regulatory criteria for VOCs. If a drum's contents are from a well where the analytical results exceed the TCLP regulatory criteria, that drum will be shipped off-site to The Environmental Quality Company (EQ) Michigan Disposal Waste Treatment Plant. If the a drum's contents are below the TCLP regulatory criteria, the drum contents will be discharged to the City of Lockport Waste Water Treatment Facility via the process sewer located at Pump House 2.

- Drums that will be shipped off-site to EQ's Michigan Disposal Waste Treatment Plant for disposal will be transported by U.S. Industrial Technologies, located in Livonia, Michigan and their USEPA Identification Number is MIK757944491

Appendix D contains a Generator Approval Notification letter from EQ to GMCH acknowledging that the EQ facility can accept the waste materials and the facility has the appropriate permits issued by the federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material.

4.4 REMEDIAL PERFORMANCE/DOCUMENTATION SAMPLING

The results of the MNA groundwater sampling event are to be provided to NYSDEC annually in January of each year unless a change to the timing or frequency of submittals is approved by NYSDEC, as part of the Periodic Review Report (Section 5.3 of the SMP).

Section 5.4 of the SMP is a Corrective Measure Plans which outlines steps to be taken if groundwater concentrations at the downgradient monitoring locations (MW-11, MW-12, MW-13, MW-14 and MW-15) increase to greater of either two times the NYSDEC Class GA criteria or to two times the concentration of the previous sample round.

Tables and figure summarizing the groundwater sampling results are included in Tables 3A through 3J and Figure 3, respectively, and exceedances of NYSDEC Class GA criteria are shown in bold.

4.5 IMPORTED BACKFILL

No excavations were done as part of the Remedial Program and therefore backfill soils were not used at the Site. However, if future activities within the Site require backfill to be imported, it will be done in accordance with Section A-10 of the Excavation Work Plan in Appendix A of the SMP.

4.6 CONTAMINATION REMAINING AT THE SITE

As stated in the SMP, residual contamination exists in the subsurface soil at the Site, which is primarily located at the top of bedrock in the vicinity of the former TCE tank. Four soil samples were collected from the bottom of the excavation. TCE was

measured at concentrations ranging from 0.38 parts per million (ppm) and 1,800 ppm.

Widespread bedrock groundwater contamination exists down gradient of the former TCE tank, with no current off-site impacts as documented in the annual MNA reports submitted to NYSDEC to date.

Given the presence of residual contamination, the Site Management Plan (SMP) approved by the NYSDEC contains provisions to address residual contaminated soils that may be excavated from the Site during future redevelopment (see ROD at Page 15).

The Excavation Work Plan in Appendix A of the SMP outlines the procedures required to be implemented in the event the soil cover is breached, penetrated or temporarily removed, and any underlying residual contamination is encountered. Procedures for the inspection and maintenance of this cover are provided in the Monitoring Plan included in Section 3 of the SMP.

It should also be noted that excavation or subsurface activities cannot be initiated at the facility without obtaining an excavation permit from the Engineering Department. The SMP also requires that NYSDEC be given 7-days notice of any proposed ground-intrusive activities covered by the Excavation Work Plan that is not deemed emergency or essential to facility operations. If ground-intrusive activities must be initiated due to an emergency or to maintain essential facility operations, NYSDEC will be notified as soon as possible.

4.7 MONITORED NATURAL ATTENUATION

MNA refers to the reliance on the natural attenuation process within the context of a controlled and monitored site cleanup approach, to achieve remediation goals, which in this case, is to the extent practicable, ambient groundwater quality standards (see ROD at page 9). Natural attenuation is defined as the biodegradation, dispersion, dilution, sorption, volatilization, radioactive decay, and/or chemical or biological stabilization, transformation, or destruction of constituents in soil and groundwater, whereby constituent toxicity, mobility or volume is effectively reduced to levels that are protective of public health and the environment. This natural attenuation at the Site is likely occurring through reductive dechlorination.

Reductive dechlorination is the replacement of a chlorine atom with a hydrogen atom on an organic compound, caused by microbial catalyzed reactions. In such a reaction, PCE and TCE are sequentially reduced to lower chlorinated ethenes, such as cis-DCE, VC and ultimately ethene.

Access to the eastern portion of the Site is limited by chain link fencing, although no fencing bounds the site on the north, east or west. However, the facility has security personnel that monitor and control access, 24-hours a day, seven days a week.

4.8 INSTITUTIONAL CONTROLS

The Site has Institutional Controls in the form of site restrictions. Adherence to these Institutional Controls is required by an Environmental Easement that was approved by the Department and recorded in the Niagara County Clerk's Office on October 6, 2011. The County Recording Identifier number for this filing is #2009-19256. A copy of the easement and proof of filing are provided in Appendix C of this document.

The Site restrictions that apply to the Site are reflected in the recorded Environmental Easement as required by the ROD and they:

- Require compliance with the approved SMP (see paragraph 2.A.1 of the Easement);
- Limit the use and development of the Site to commercial or industrial uses only (see paragraph 2.A.2 of the Easement);
- Restrict use of groundwater as a source of potable or process water, without necessary water quality treatment as determined by the Niagara County Department of Health (see paragraph 2.A.2 of the Easement);
- Evaluate the potential for vapor intrusion for any buildings developed on the Controlled Property. Provision for mitigation (if determined to be needed by NYSDEC), such as installation of a vapor barrier and sub-slab vapor system or other engineering controls, shall be implemented on all structures on the Controlled Property prior to occupancy (see paragraph 2.A.3 of the Easement); and
- Require the property owner to complete and submit the NYSDEC IC/EC certification (see paragraph 2.F of the Easement).

4.9 DEVIATIONS FROM THE REMEDIAL ACTION WORK PLAN

Not applicable as active remediation was not required by the March 2005 ROD.

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TABLE 1

Compounds of Concern Commercial Soil Cleanup Objectives
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Parameter	Part 375 Commercial SCOs mg/kg
Trichloroethylene	0.47
Tetrachloroethylene	1.3
Cis-1,2-dichloroethylene	0.25
trans-1,2dichloroethylene	0.19
Vinyl chloride	0.02

TABLE 2

Coumpounds of Concern Class GA Groundwater Criteria
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Parameter	Class GA Criteria mg/L
Trichloroethylene	**0.005**
Tetrachloroethylene	**0.005**
Cis-1,2-dichloroethylene	**0.005**
trans-1,2dichloroethylene	**0.005**
Vinyl chloride	**0.002**

TABLE 3A

MW-4 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
4/30/1996	**32**	<0.5	**170**	**40**
6/20/1996	**19**	<0.5	**120**	**20**
10/30/1996	**36**	<0.5	**120**	**14**
11/21/1996	**37**	<0.5	**120**	**18**
8/28/1997	**29**	<0.5	**100**	**14**
10/10/1997	**33**	<0.2	**110**	**27**
12/2/1998	**21**	<0.2	**120**	**13**
10/7/1999	**20**	<0.05	**110.14**	**14**
8/9/2001	**30**	0.003	**93.28**	**18**
10/31/2001	**22**	<0.002	**84.25**	**18**
4/7/2003	**39**	**0.08**	**110**	**26**
7/20/2009	**23**	<0.05	**41.5**	**6.7**
4/29/2010	**20**	0.0012	**43.2**	**9.6**
4/22/2011	**24**	0.0018	**50**	**12**

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria
Duplicate samples were collected from this location on 6/20/96, 10/30/96 and 12/2/98.
The higher of the two concentrations were recorded in this graph.

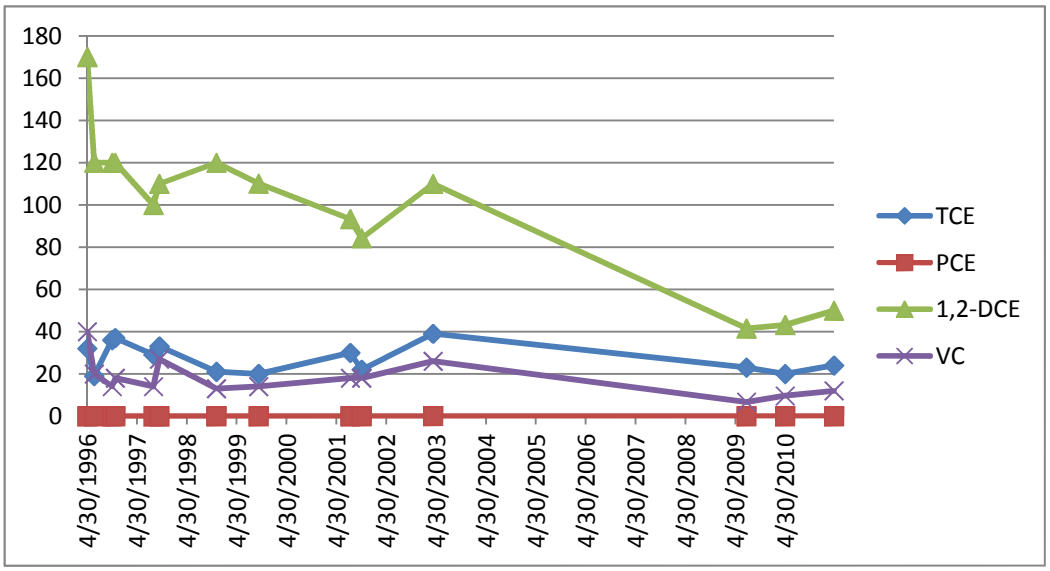


TABLE 3B

MW-7 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
4/30/1996	**1300**	<0.5	**37**	**1.8**
6/20/1996	**1100**	<0.5	**24**	**2.4**
10/30/1996	**790**	<0.5	**32**	**2.3**
11/21/1996	**850**	<0.5	**35**	**3.1**
8/28/1997	**820**	<0.2	**22**	**1.1**
10/10/1997	**720**	<0.2	**43**	**4.8**
12/3/1998	**570**	<0.2	**55**	**4.2**
10/7/1999	**540**	<0.5	**41**	**3.5**
4/7/2003	**75**	<0.2	**45**	**3**
10/25/2006	**260**	**0.077**	**36**	**1.7**
11/29/2007	**434**	**0.049**	**40**	**3.2**
11/5/2008	**1.1**	<0.2	**70**	**2.6**
2/24/2009	**530**	**0.071**	**56**	**3.6**
7/15/2009	**618**	**0.112**	**58.3**	**2.5**
4/29/2010	**800**	**0.14**	**55.2**	**9**
4/11/2011	**680**	<1.8	**42**	<4.5

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria

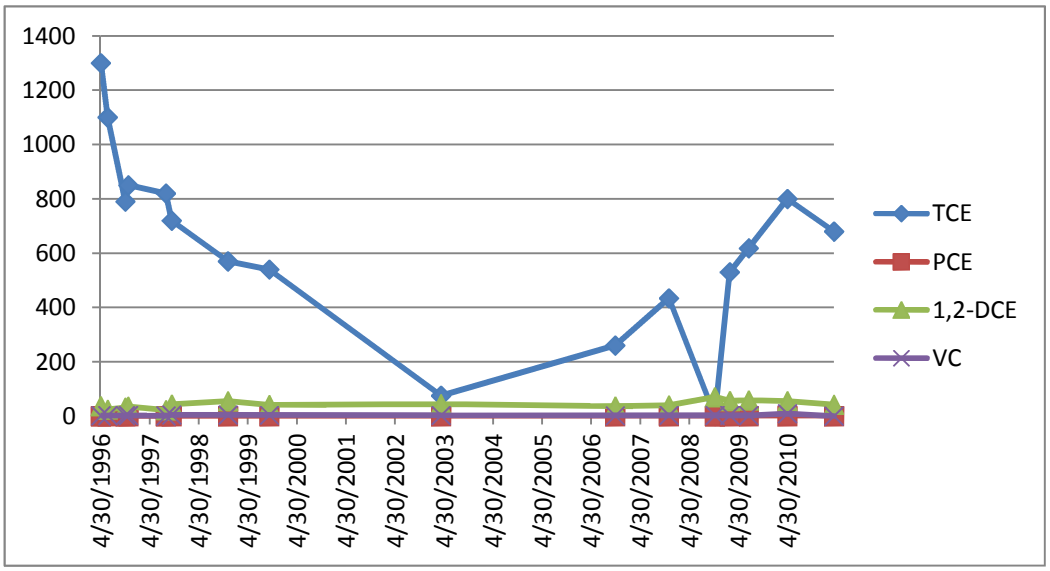


TABLE 3C

MW-8 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
10/30/1996	**0.2**	**0.024**	**1.5**	**0.047**
11/21/1996	**0.22**	**0.022**	**2.6**	**0.049**
8/28/1997	**0.3**	**0.028**	**2.8**	**0.062**
10/10/1997	**0.35**	**0.018**	**4.3**	**0.11**
12/2/1998	**0.22**	**0.012**	**1.6**	**0.062**
10/7/1999	**0.2**	**0.011**	**2.802**	**0.18**
7/15/2009	**0.05**	0.005	**0.865**	**0.1**
4/30/2010	**0.11**	**0.013**	**1.3**	**0.12**
4/22/2011	**0.078**	**0.0077**	**0.813**	**0.12**

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria

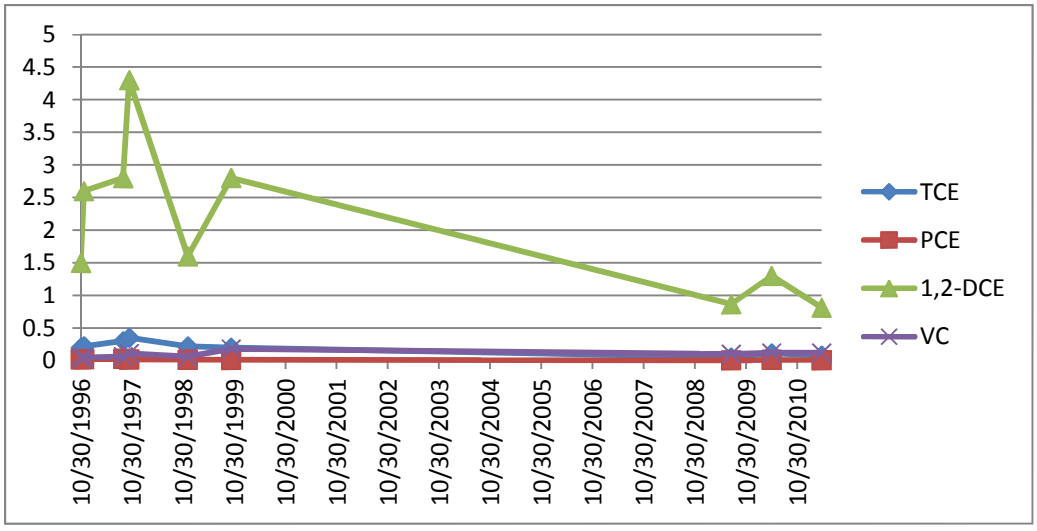


TABLE 3D

MW-9 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
10/30/1996	**2.2**	**0.21**	**3.3**	**0.1**
11/21/1996	**2**	**0.07**	**3.2**	**0.16**
8/28/1997	**1.4**	**0.027**	**2.5**	**0.056**
10/10/1997	**1.6**	**0.047**	**2.7**	**0.12**
12/2/1998	**1.9**	**0.066**	**2.5**	**0.03**
10/5/1999	**1.4**	**0.062**	**1.608**	**0.11**
7/20/2009	**3.3**	**0.186**	**1.7**	<0.05
4/30/2010	**2.2**	**0.16**	**1.1**	**0.031**
4/22/2011	**2.3**	**0.18**	**1.105**	**0.032**

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria
Duplicate samples were collected from this location on 11/21/96 and 10/5/99. The higher of the two concentrations were recorded in this graph.

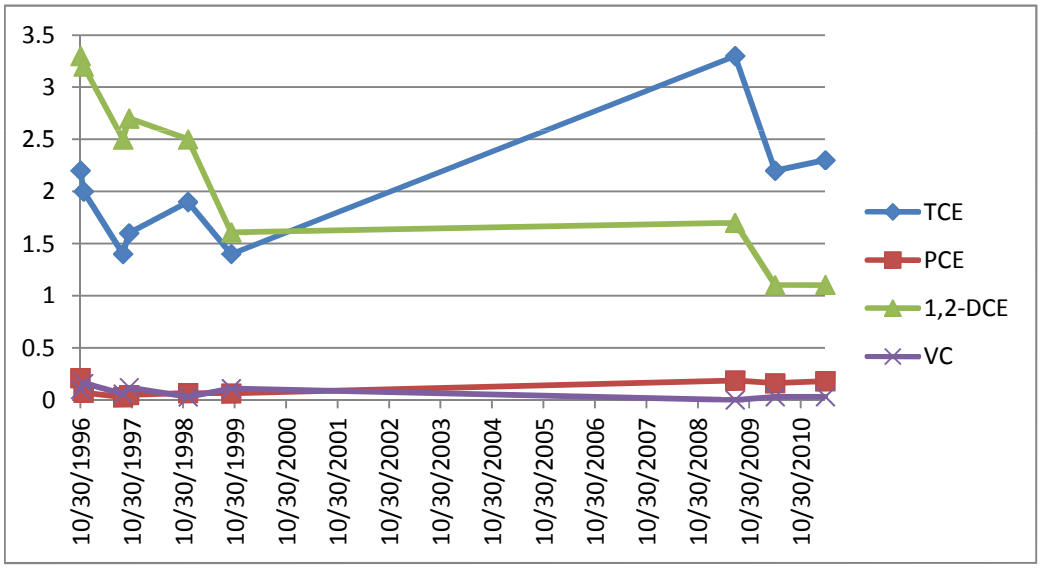


TABLE 3E

MW-10 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
10/30/1996	**0.98**	**0.12**	**1.8**	**0.11**
11/21/1996	**0.87**	**0.22**	**1.7**	<0.1
8/28/1997	**0.38**	**0.16**	**1.1**	**0.07**
10/10/1997	**0.35**	**0.28**	**0.76**	**0.047**
12/1/1998	**0.46**	**0.016**	**1.3**	**0.11**
10/6/1999	**0.23**	**0.24**	**0.722**	**0.2**
8/9/2001	**0.21**	**0.21**	**0.514**	**0.057**
10/31/2001	**0.25**	**0.023**	**0.473**	**0.053**
7/15/2009	**0.079**	**0.118**	**0.275**	**0.044**
4/28/2010	**0.024**	**0.026**	**0.153**	**0.042**
4/21/2011	**0.088**	**0.067**	**0.232**	**0.027**

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria

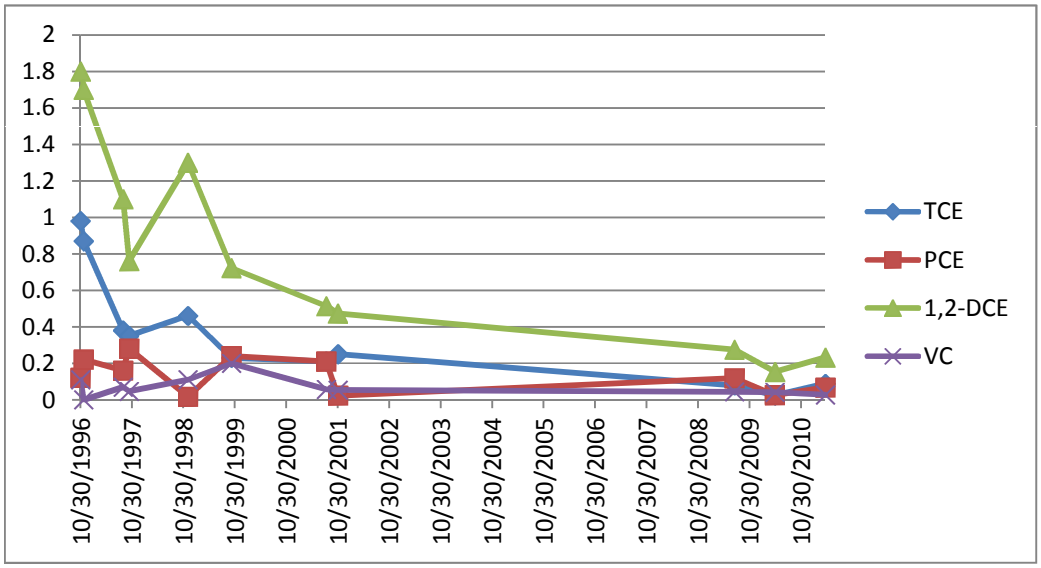


TABLE 3F

MW-11 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
8/28/1997	<0.0005	<0.0005	0.0045	**0.0039**
10/10/1997	<0.0005	<0.0005	0.0032	0.0012
12/1/1998	<0.0005	<0.0005	**0.013**	**0.0046**
10/5/1999	<0.0005	<0.0005	**0.01**	0.0019
8/8/2001	<0.002	<0.002	**0.009**	**0.008**
10/30/2001	<0.002	<0.002	**0.008**	**0.006**
1/12/2005	<0.002	<0.002	<0.002	<0.002
10/24/2006	<0.002	<0.002	<0.002	<0.002
11/28/2007	<0.002	<0.002	0.002	**0.003**
11/4/2008	<0.002	<0.002	0.003	**0.0058**
7/16/2009	<0.005	<0.005	<0.005	<0.005
4/28/2010	<0.0005	<0.0004	0.0019	**0.0039**
4/21/2011	<0.0005	<0.0004	<0.0008	<0.0009

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria
Duplicate samples were collected from this location on 10/10/97. The higher of the two concentrations were recorded in this graph.

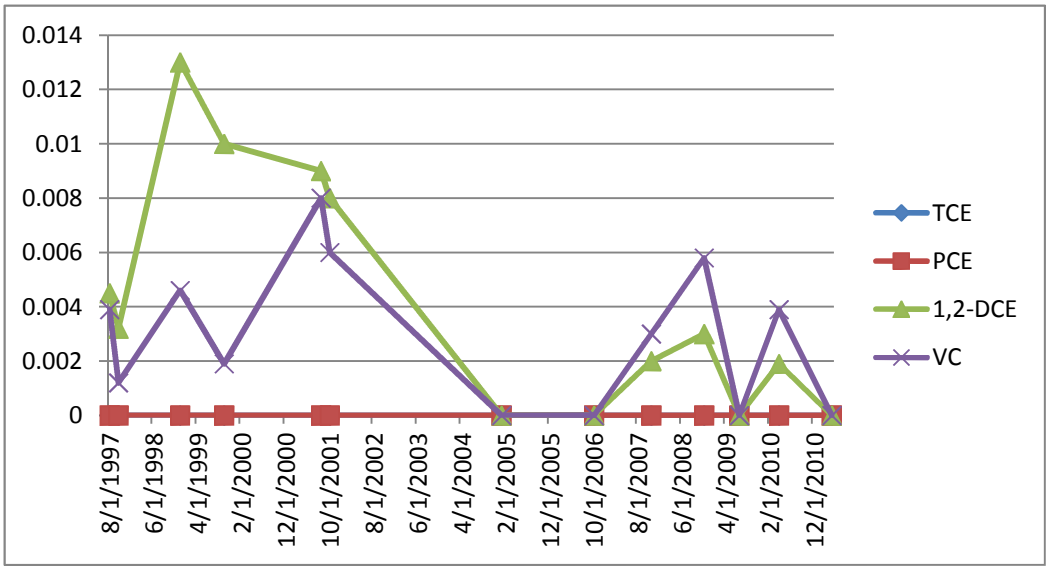


TABLE 3G

MW-12 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
8/28/1997	<0.0005	<0.0005	**0.13**	**0.19**
10/10/1997	<0.0005	<0.0005	**0.16**	**0.17**
12/1/1998	<0.0005	<0.0005	**0.047**	**0.088**
10/6/1999	<0.0005	<0.0005	**0.027**	**0.032**
8/8/2001	<0.002	<0.002	**0.14**	**0.13**
10/30/2001	<0.002	<0.002	**0.032**	**0.011**
1/12/2005	<0.002	<0.002	**0.026**	**0.033**
10/25/2006	<0.002	<0.002	**0.015**	**0.033**
11/28/2007	<0.002	<0.002	**0.011**	**0.014**
11/14/2008	<0.002	<0.002	**0.044**	**0.091**
3/16/2009	0.005	0.002	**0.15**	**0.081**
7/16/2009	<0.005	<0.005	**0.132**	**0.141**
4/28/2010	0.0028	0.0011	**0.272**	**0.12**
4/20/2011	0.0021	<0.0004	**0.096**	**0.037**

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria
Duplicate samples were collected from this location on 8/28/97 and 8/8/01. The higher of the two concentrations were recorded in this graph.

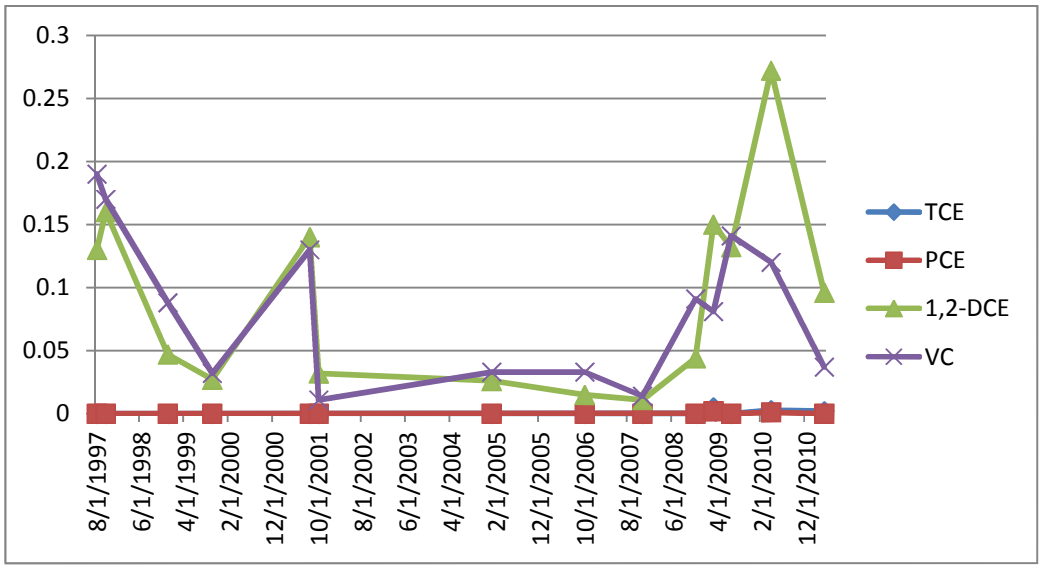


TABLE 3H

MW-13 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
8/8/2001	<0.002	<0.002	<0.002	<0.002
10/29/2001	<0.002	<0.002	<0.002	<0.002
1/12/2005	<0.002	<0.002	<0.002	<0.002
10/24/2006	0.002	<0.002	<0.002	<0.002
11/28/2007	<0.002	<0.002	<0.002	<0.002
11/5/2008	<0.002	<0.002	<0.002	<0.002
7/16/2009	<0.005	<0.005	<0.005	<0.005
4/28/2010	<0.0005	<0.0004	<0.0008	<0.0009
4/21/2011	<0.0005	<0.0004	<0.0008	<0.0009

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria

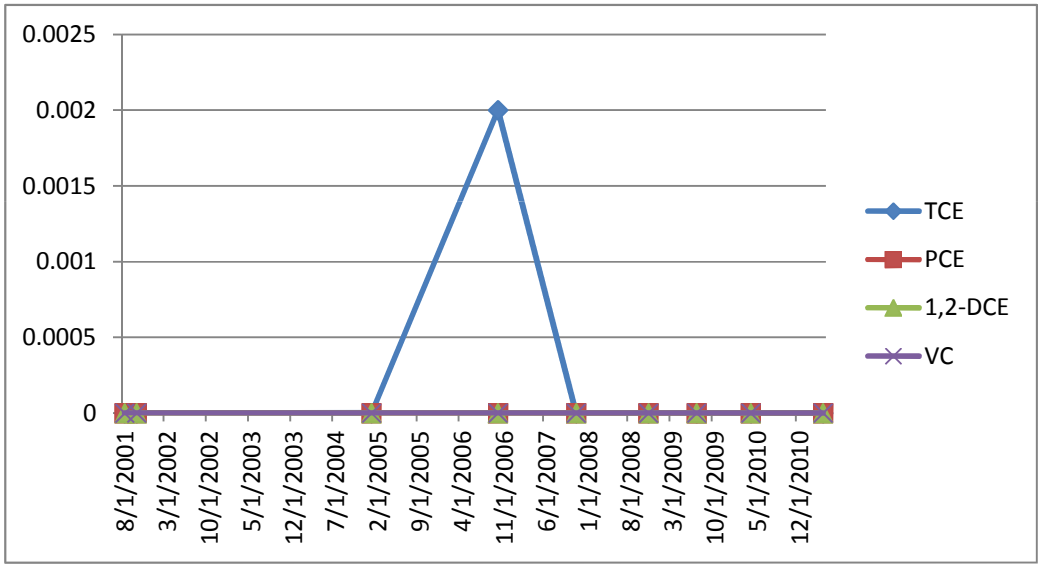


TABLE 3I

MW-14 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
8/10/2001	<0.002	<0.002	0.005	<0.002
10/30/2001	<0.002	<0.002	0.004	<0.002
10/24/2006	<0.002	<0.002	<0.002	<0.002
11/29/2007	<0.002	<0.002	**0.01**	<0.002
11/4/2008	<0.002	<0.002	**0.008**	**0.003**
2/24/2009	**0.016**	<0.002	0.002	<0.002
7/19/2009	**0.02**	<0.005	**0.028**	<0.005
4/27/2010	<0.005	<0.0004	<0.0008	<0.0009
4/21/2011	<0.005	<0.0004	<0.0008	<0.0009

Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria

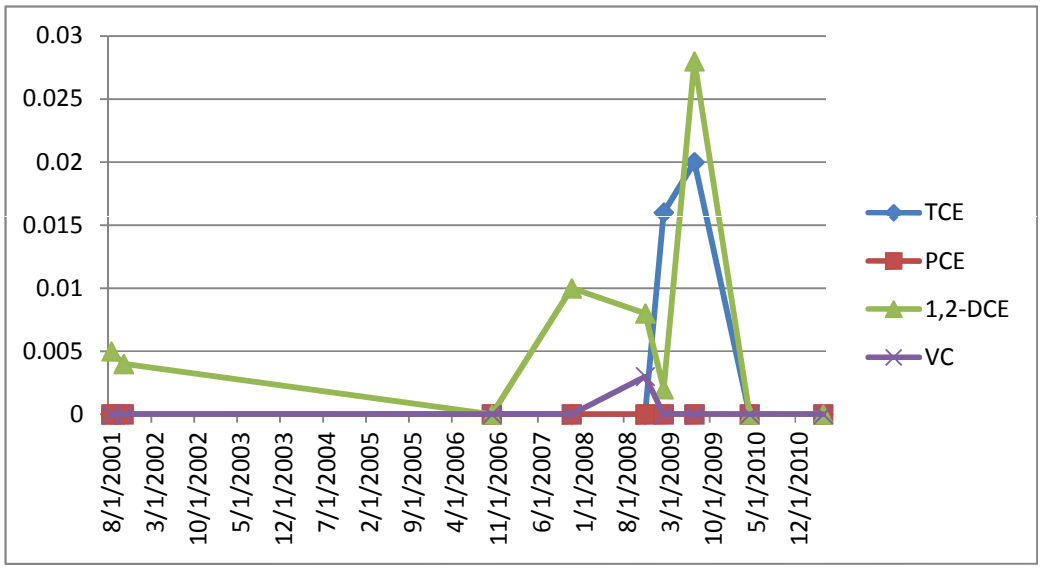
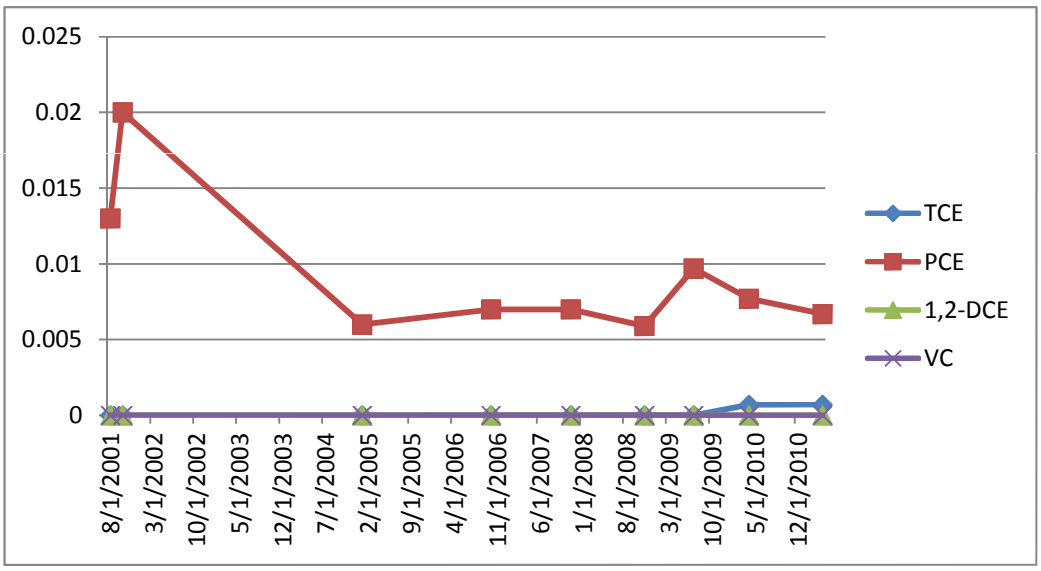


TABLE 3J

MW-15 Groundwater Data
Delphi Harrison Thermal Systems Site
GM Components Holdings, LLC
Lockport, New York

Date	TCE	PCE	1,2-DCE	VC
Class GA Criteria	0.005	0.005	0.005	0.002
8/8/2001	<0.002	**0.013**	<0.002	<0.002
10/30/2001	<0.002	**0.02**	<0.002	<0.002
1/12/2005	<0.002	**0.006**	<0.002	<0.002
10/24/2006	<0.002	**0.007**	<0.002	<0.002
11/28/2007	<0.002	**0.007**	<0.002	<0.002
11/4/2008	<0.002	**0.0059**	<0.002	<0.002
7/16/2009	<0.005	**0.0097**	<0.005	<0.005
4/28/2010	0.0007	**0.0077**	<0.0008	<0.0009
4/21/2011	0.0007	**0.0067**	<0.0008	<0.0009

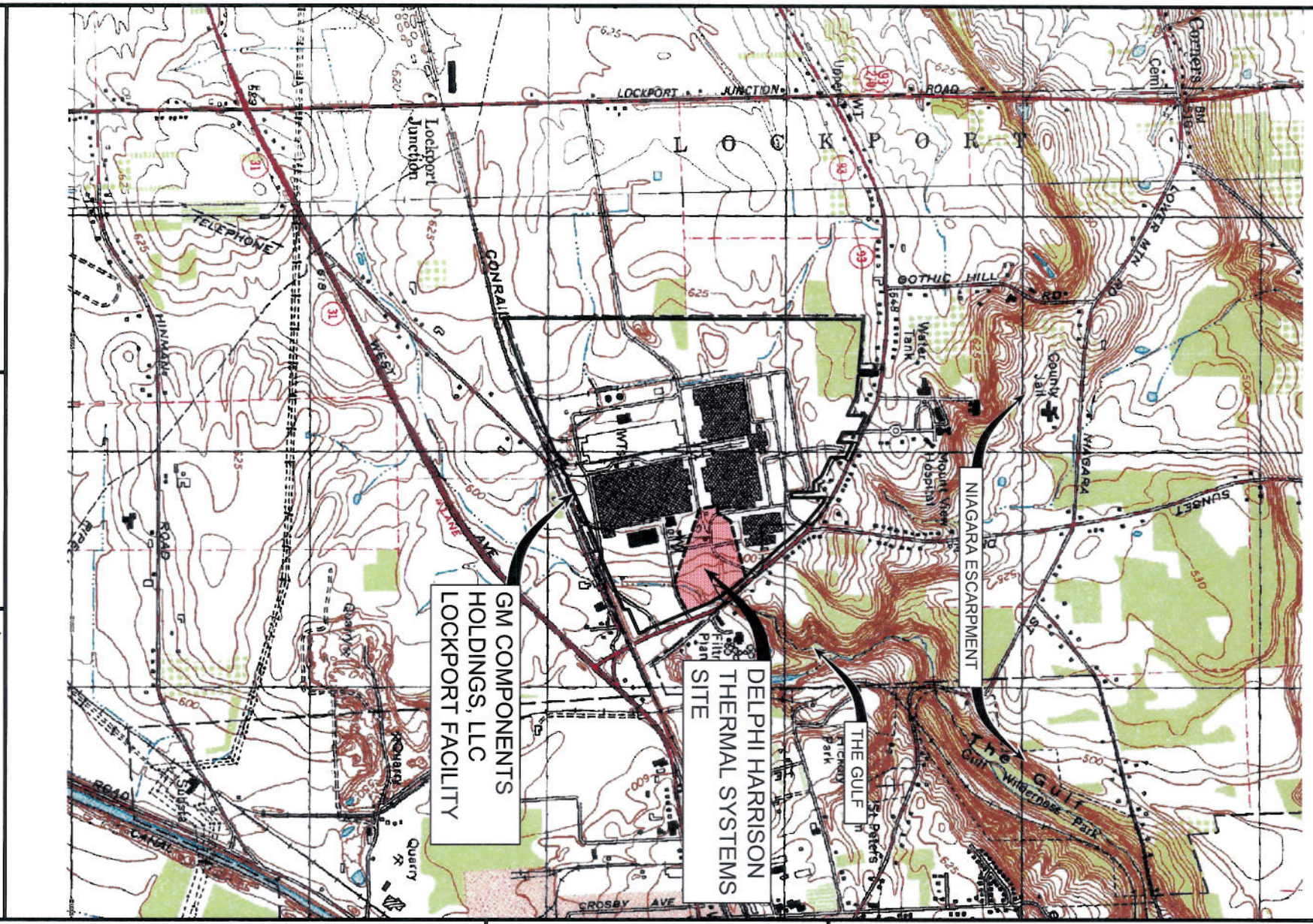
Notes:
Results are provided in parts per million (ppm)
Bolded values indicate concentration exceedance of respective NYSDEC Class GA Criteria
Duplicate samples were collected from this location on 10/30/01. The higher of the two concentrations were recorded in this graph.

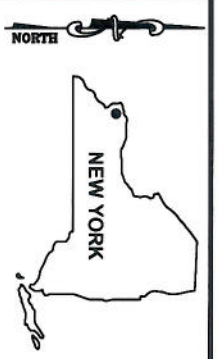


FIGURES

 GZA-T:\PROJECTS\56500s\56546 GM Component LLC\Final Engineering Report\Figure 1 Locus Plan.dwg [FIGURE 1] December 15, 2011 - 11:39am daniel.wulf

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





GM COMPONENTS HOLDINGS, LLC
FINAL ENGINEERING REPORT
DELPHI HARRISON THERMAL SYSTEMS SITE
200 UPPER MOUNTAIN ROAD
LOCKPORT, NEW YORK
SITE NUMBER 9-32-113

SITE PLAN

SCALE IN FEET

0 1000 2000 4000

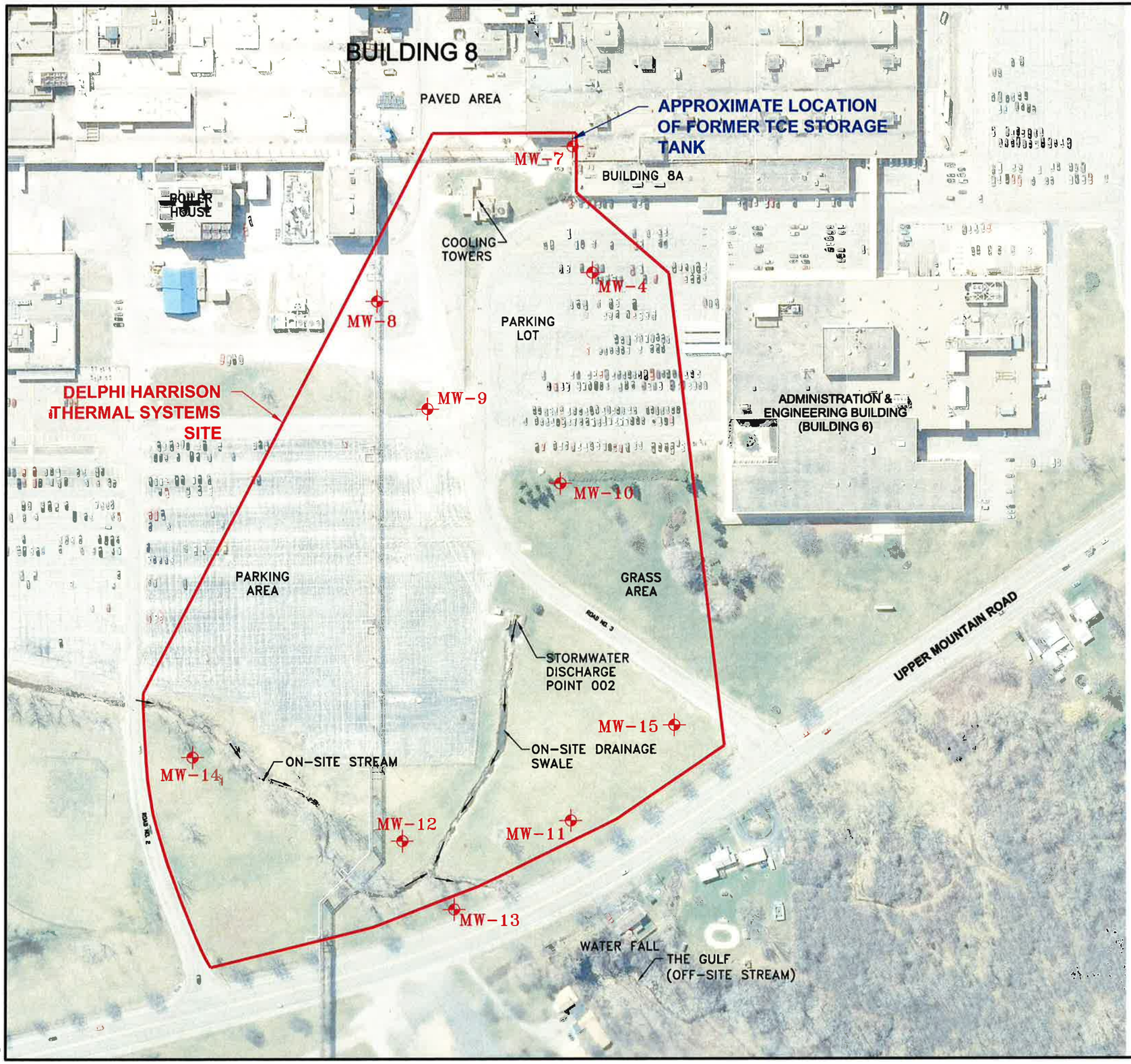
DRAWN BY: **DEW**

DATE: **DECEMBER 2011**

GZA GeoEnvironmental of New York

PROJECT No. **21.0056546.00**

FIGURE No. **1**



NORTH

LEGEND:

MW-8 APPROXIMATE LOCATION AND DESIGNATION OF MONITORING WELL INSTALLED BY GZA

NOTES:

1. BASE MAP ADAPTED FROM A 2008 AERIAL PHOTOGRAPH DOWNLOADED FROM http://www.nysgis.state.ny.us/gateway/mg/interactive_main.html AND SITE OBSERVATIONS.

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

DRAWN BY: DEW

DATE: DECEMBER 2011

GZA GeoEnvironmental of New York

APPROXIMATE SCALE IN FEET

0 90 180 360

GM COMPONENTS HOLDINGS, LLC

FINAL ENGINEERING REPORT

DELPHI HARRISON THERMAL SYSTEMS SITE

200 UPPER MOUNTAIN ROAD

LOCKPORT, NEW YORK

SITE NUMBER 9-32-113

SITE PLAN

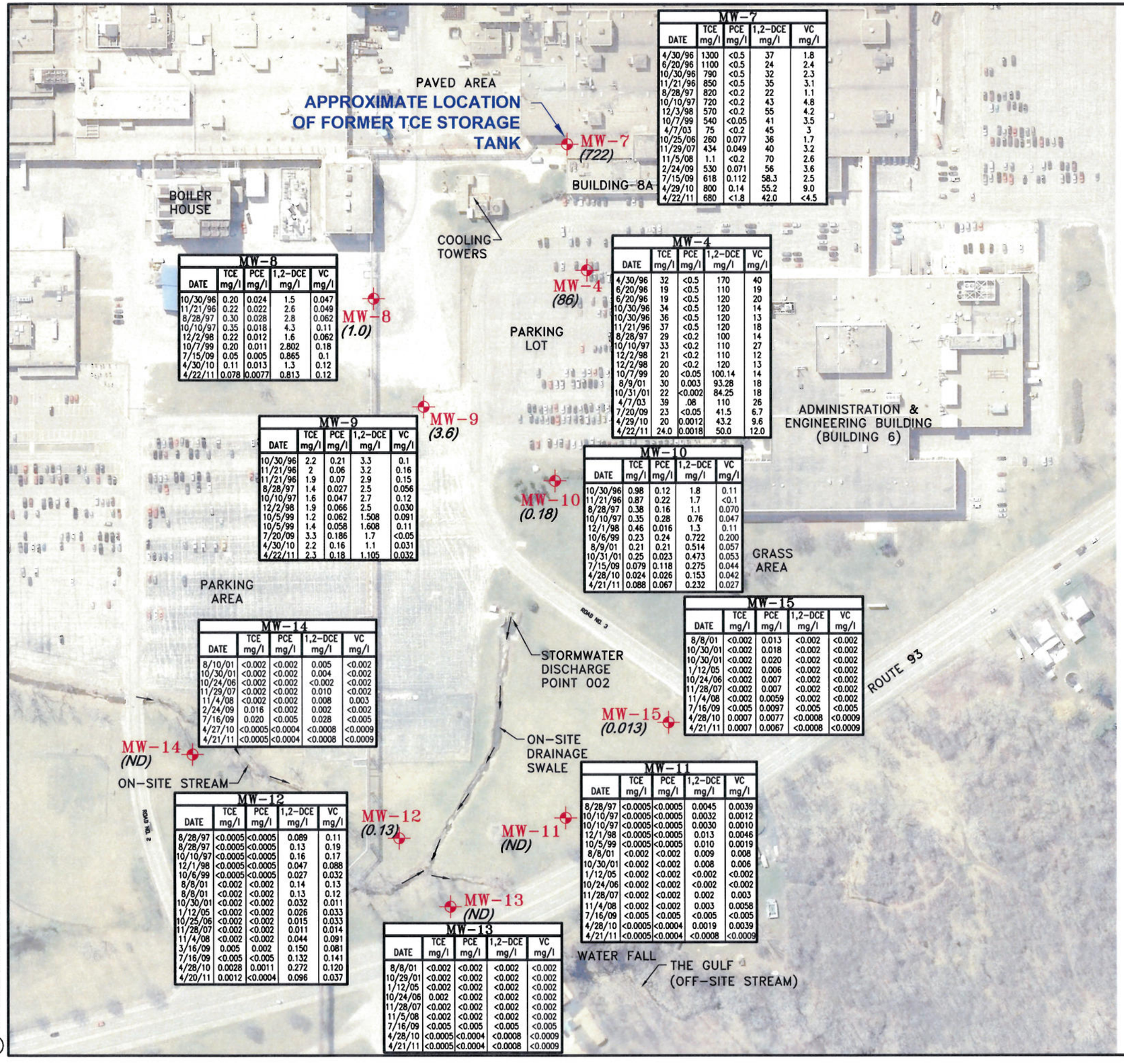
PROJECT No.

21.0056546.00

FIGURE No.

2

GZA-T:\PROJECTS\56500s\56546 GM Component LLC\Final Engineering Report\Figure 2 Site Plan.dwg [Figure 2] March 01, 2012 - 2:19pm daniel.wulf



MW-7

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
4/30/96	1300	<0.5	37	1.8
6/20/96	1100	<0.5	24	2.4
10/30/96	790	<0.5	32	2.3
11/21/96	850	<0.5	35	3.1
8/28/97	820	<0.2	22	1.1
10/10/97	720	<0.2	43	4.8
12/3/98	570	<0.2	55	4.2
10/7/99	540	<0.05	41	3.5
4/7/03	75	<0.2	45	3
10/25/06	260	0.077	36	1.7
11/29/07	434	0.049	40	3.2
11/5/08	1.1	<0.2	70	2.6
2/24/09	530	0.071	56	3.6
7/15/09	618	0.112	58.3	2.5
4/29/10	800	0.14	55.2	9.0
4/22/11	680	<1.8	42.0	<4.5

MW-8

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
10/30/96	0.20	0.024	1.5	0.047
11/21/96	0.22	0.022	2.6	0.049
8/28/97	0.30	0.028	2.8	0.062
10/10/97	0.35	0.018	4.3	0.11
12/2/98	0.22	0.012	1.6	0.062
10/7/99	0.20	0.011	2.802	0.18
7/15/09	0.05	0.005	0.865	0.1
4/30/10	0.11	0.013	1.3	0.12
4/22/11	0.078	0.0077	0.813	0.12

MW-4

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
4/30/96	32	<0.5	170	40
6/20/96	19	<0.5	110	19
6/20/96	19	<0.5	120	20
10/30/96	34	<0.5	120	14
10/30/96	36	<0.5	120	13
11/21/96	37	<0.5	120	18
8/28/97	29	<0.2	100	14
10/10/97	33	<0.2	110	27
12/2/98	21	<0.2	110	12
12/2/98	20	<0.2	120	13
10/7/99	20	<0.05	100.14	14
8/9/01	30	0.003	93.28	18
10/31/01	22	<0.002	84.25	18
4/7/03	39	.08	110	26
7/20/09	23	<0.05	41.5	6.7
4/29/10	20	0.0012	43.2	9.6
4/22/11	24.0	0.0018	50.0	12.0

MW-9

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
10/30/96	2.2	0.21	3.3	0.1
11/21/96	2	0.06	3.2	0.16
11/21/96	1.9	0.07	2.9	0.15
8/28/97	1.4	0.027	2.5	0.056
10/10/97	1.6	0.047	2.7	0.12
12/2/98	1.9	0.066	2.5	0.030
10/5/99	1.2	0.062	1.508	0.091
10/5/99	1.4	0.058	1.608	0.11
7/20/09	3.3	0.186	1.7	<0.05
4/30/10	2.2	0.16	1.1	0.031
4/22/11	2.3	0.18	1.105	0.032

MW-10

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
10/30/96	0.98	0.12	1.8	0.11
11/21/96	0.87	0.22	1.7	<0.1
8/28/97	0.38	0.16	1.1	0.070
10/10/97	0.35	0.28	0.76	0.047
12/1/98	0.46	0.016	1.3	0.11
10/6/99	0.23	0.24	0.722	0.200
8/9/01	0.21	0.21	0.514	0.057
10/31/01	0.25	0.023	0.473	0.053
7/15/09	0.079	0.118	0.275	0.044
4/28/10	0.024	0.026	0.153	0.042
4/21/11	0.088	0.067	0.232	0.027

MW-15

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
8/8/01	<0.002	0.013	<0.002	<0.002
10/30/01	<0.002	0.018	<0.002	<0.002
10/30/01	<0.002	0.020	<0.002	<0.002
1/12/05	<0.002	0.006	<0.002	<0.002
10/24/06	<0.002	0.007	<0.002	<0.002
11/28/07	<0.002	0.007	<0.002	<0.002
11/4/08	<0.002	0.0059	<0.002	<0.002
7/16/09	<0.005	0.0097	<0.005	<0.005
4/28/10	0.0007	0.0077	<0.0008	<0.0009
4/21/11	0.0007	0.0067	<0.0008	<0.0009

MW-14

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
8/10/01	<0.002	<0.002	0.005	<0.002
10/30/01	<0.002	<0.002	0.004	<0.002
10/24/06	<0.002	<0.002	<0.002	<0.002
11/29/07	<0.002	<0.002	0.010	<0.002
11/4/08	<0.002	<0.002	0.008	0.003
2/24/09	0.016	<0.002	0.002	<0.002
7/16/09	0.020	<0.005	0.028	<0.005
4/27/10	<0.0005	<0.0004	<0.0008	<0.0009
4/21/11	<0.0005	<0.0004	<0.0008	<0.0009

MW-11

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
8/28/97	<0.0005	<0.0005	0.0045	0.0039
10/10/97	<0.0005	<0.0005	0.0032	0.0012
10/10/97	<0.0005	<0.0005	0.0030	0.0010
12/1/98	<0.0005	<0.0005	0.013	0.0046
10/5/99	<0.0005	<0.0005	0.010	0.0019
8/8/01	<0.002	<0.002	0.009	0.008
10/30/01	<0.002	<0.002	0.008	0.006
1/12/05	<0.002	<0.002	<0.002	<0.002
10/24/06	<0.002	<0.002	<0.002	<0.002
11/28/07	<0.002	<0.002	0.002	0.003
11/4/08	<0.002	<0.002	0.003	0.0058
7/16/09	<0.005	<0.005	<0.005	<0.005
4/28/10	<0.0005	<0.0004	0.0019	0.0039
4/21/11	<0.0005	<0.0004	<0.0008	<0.0009

MW-12

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
8/28/97	<0.0005	<0.0005	0.089	0.11
8/28/97	<0.0005	<0.0005	0.13	0.19
10/10/97	<0.0005	<0.0005	0.16	0.17
12/1/98	<0.0005	<0.0005	0.047	0.088
10/6/99	<0.0005	<0.0005	0.027	0.032
8/8/01	<0.002	<0.002	0.14	0.13
8/8/01	<0.002	<0.002	0.13	0.12
10/30/01	<0.002	<0.002	0.032	0.011
1/12/05	<0.002	<0.002	0.026	0.033
10/25/06	<0.002	<0.002	0.015	0.033
11/28/07	<0.002	<0.002	0.011	0.014
11/4/08	<0.002	<0.002	0.044	0.091
3/16/09	0.005	0.002	0.150	0.081
7/16/09	<0.005	<0.005	0.132	0.141
4/28/10	0.0028	0.0011	0.272	0.120
4/20/11	0.0012	<0.0004	0.096	0.037

MW-13

DATE	TCE mg/l	PCE mg/l	1,2-DCE mg/l	VC mg/l
8/8/01	<0.002	<0.002	<0.002	<0.002
10/29/01	<0.002	<0.002	<0.002	<0.002
1/12/05	<0.002	<0.002	<0.002	<0.002
10/24/06	0.002	<0.002	<0.002	<0.002
11/28/07	<0.002	<0.002	<0.002	<0.002
11/5/08	<0.002	<0.002	<0.002	<0.002
7/16/09	<0.005	<0.005	<0.005	<0.005
4/28/10	<0.0005	<0.0004	<0.0008	<0.0009
4/21/11	<0.0005	<0.0004	<0.0008	<0.0009

NORTH

NOTES:

1. BASE MAP ADAPTED FROM A 2008 AERIAL PHOTOGRAPH DOWNLOADED FROM http://www.nysgis.state.ny.us/gateway/mg/interactive_main.html AND SITE OBSERVATIONS.

2. ANALYTICAL TESTING WAS COMPLETED BY FREE-COL LABORATORIES, INC.

3. UNITS ARE LISTED IN MILLIGRAMS PER LITER (mg/l). (< - INDICATES COMPOUND NOT DETECTED ABOVE THE SPECIFIED DETECTION LIMIT)

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

LEGEND:

MW-8 — APPROXIMATE LOCATION AND DESIGNATION OF MONITORING WELL INSTALLED BY GZA

TCE = TRICHLOROETHENE

PCE = TETRACHLOROETHENE

1,2-DCE = TRANS & CIS 1,2-DICHLOROETHENE

VC = VINYL CHLORIDE

DRAWN BY: DEW

DATE: DECEMBER 2011

GZA GeoEnvironmental of New York

APPROXIMATE SCALE IN FEET

0 90 180 360

GM COMPONENTS HOLDINGS, LLC

FINAL ENGINEERING REPORT

DELPHI HARRISON THERMAL SYSTEMS SITE

200 UPPER MOUNTAIN ROAD, LOCKPORT, NEW YORK

SITE NUMBER 9-32-113

GROUNDWATER ANALYTICAL TEST RESULTS FOR TARGET CHLORINATED COMPOUNDS

PROJECT No.

21.0056546.00

FIGURE No.

3

APPENDIX A

Address: 200 Upper Mountain Road, City of Lockport, Niagara County, New York.
Tax Map No: 108.13 – 1 – 1
Acreage: 22.683 ± acres.

SCHEDULE "A"
ENVIRONMENTAL EASEMENT AREA DESCRIPTION

ALL THAT TRACT OR PARCEL OF LAND situate in the City of Lockport, County of Niagara, State of New York, and being part of Lots 3 and 4, Township 14, Range 7 of the Holland Land Company Survey, bounded and described as follows:
BEGINNING AT A POINT on the southwest line of Parcel No. 4 as shown on Map No. 4 of lands appropriated by The People of the State of New York for Upper Mountain Road Arterial at a distance of 186.60 feet southeasterly measured along the southwest line of Parcel No. 4 from the northwest corner hereof;
THENCE: The following four (4) courses and distances and along the southwest line of said Parcel No. 4:

1. South 42° - 33' – 00" East 235.90 feet to an angle point;
2. South 34° - 35' – 00" East 266.60 feet to an angle point;
3. South 29° - 31' – 00" East 201.50 feet to an angle point;
4. South 22° - 23' – 00" East 289.88 feet to a point on a non-tangent curve;

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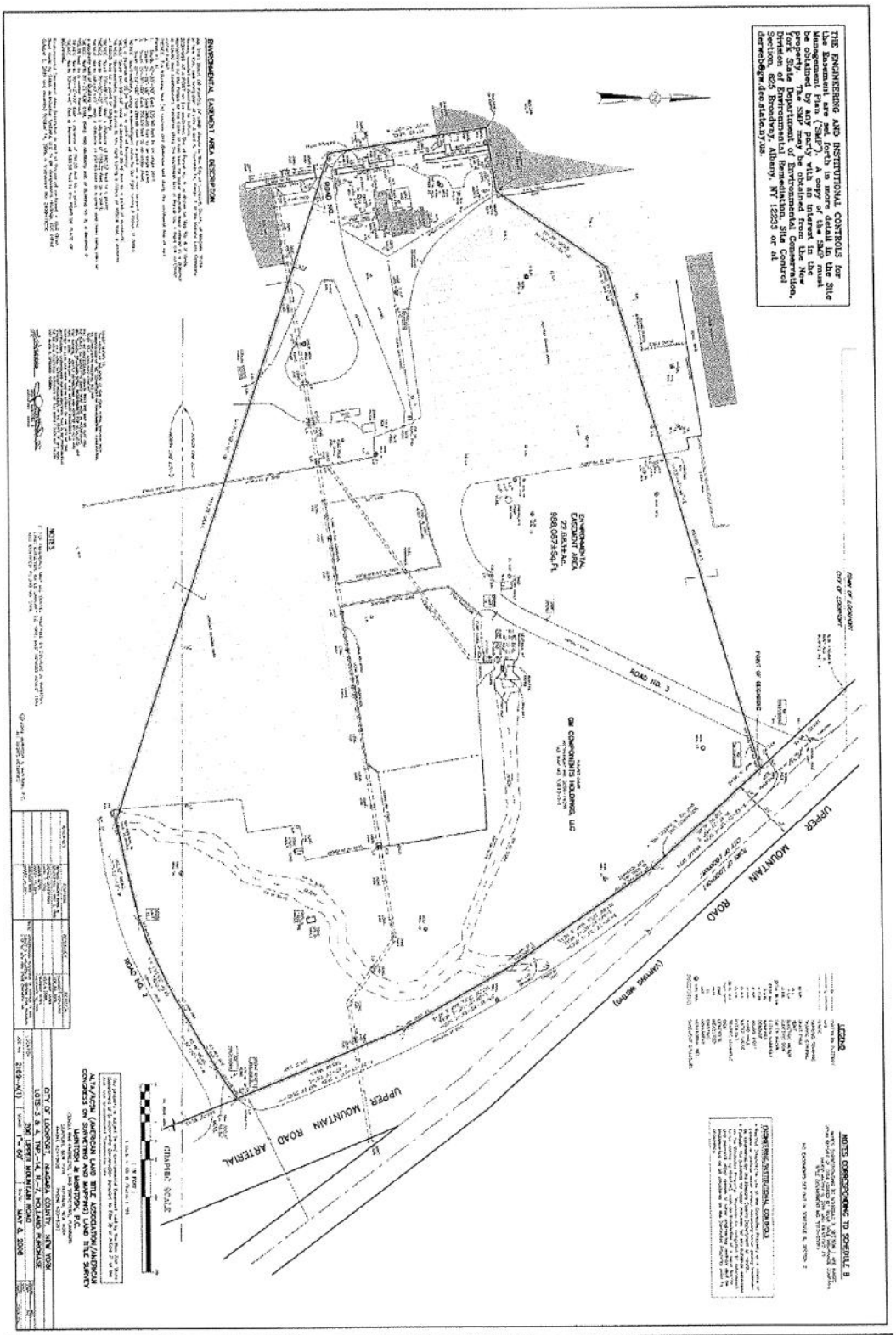
THENCE: South 59° - 50' – 59" West a distance of 85.46 feet to a point of curvature;
THENCE: Southwesterly, along a curve to the right having a radius of 1020.0 feet, a distance of 180.95 feet to a point of tangency;
THENCE: South 77° - 10' – 53" West a distance of 162.57 feet to a point;
THENCE: North 71° - 50' – 15" West a distance of 1118.22 feet to a point;
THENCE: North 08° - 42' – 07" West a distance of 257.63 feet to a point said point being also on a southerly wall of Building No. 8;
THENCE: North 81° - 27' – 09" East, along said southerly wall of Building No. 8, a distance of 102.26 feet to a corner thereof;
THENCE: North 35° - 13' – 09" East a distance of 211.30 feet to a point;
THENCE: North 73° - 47'– 46" East a distance of 833.02 feet to the POINT OR PLACE OF BEGINNING.

SURVEY


THE ENGINEERING AND INSTITUTIONAL CONTROLS for the Easement are set forth in more detail in the Site Management Plan ("SMP"). A copy of the SMP must be obtained by any party with an interest in the property prior to any subsurface disturbance. Contact the New York State Department of Environmental Conservation, Division of Environmental Remediation, Site Control Section, 625 Broadway, Albany, NY 12233 or at derweb@gw.dec.state.ny.us.
ENVIRONMENTAL EASEMENT AREA DESCRIPTION
NOTES
ROAD NO. 3
ROAD NO. 1
UPPER MOUNTAIN ROAD
(CAMBRIA MOTEL)
UPPER MOUNTAIN ROAD ARTERIAL
GRAPHIC SCALE
LEGEND
NOTES CORRESPONDING TO SCHEDULE B
ENVIRONMENTAL EASEMENT AREA
ALTA/ACSM (AMERICAN LAND TITLE ASSOCIATION/AMERICAN CONGRESS ON SURVEYING & MAPPING) LAND TITLE SURVEY
HARRISON & HARRISON, P.C.
CITY OF LOCKPORT, NIAGARA COUNTY, NEW YORK
LOTS 3 & 4, UPPER MOUNTAIN ROAD INDUSTRIAL PARK
MAY 8, 2006

APPENDIX B

APPENDIX C

County: NIAGARA Site No: 9-32-113 Contract/Order No: B9-0553-99-06

ENVIRONMENTAL EASEMENT GRANTED PURSUANT TO ARTICLE 71, TITLE 36 OF THE NEW YORK STATE ENVIRONMENTAL CONSERVATION LAW

THIS INDENTURE made this 28th day of September 2011, between Owner GM Components Holdings, LLC, having an office at 200 Upper Mountain Road, Lockport, New York 14094 (the "Grantor"), and The People of the State of New York (the "Grantee."), acting through their Commissioner of the Department of Environmental Conservation (the "Commissioner", or "NYSDEC" or "Department" as the context requires) with its headquarters located at 625 Broadway, Albany, New York 12233,

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to encourage the remediation of abandoned and likely contaminated properties ("sites") that threaten the health and vitality of the communities they burden while at the same time ensuring the protection of public health and the environment; and

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to establish within the Department a statutory environmental remediation program that includes the use of environmental easements as an enforceable means of ensuring the performance of operation, maintenance, and/or monitoring requirements and of ensuring the potential restriction of future uses of the land, when an environmental remediation project leaves residual contamination at levels that have been determined to be safe for a specific use, but not all uses, or which includes engineered structures that must be maintained or protected against damage to perform properly and be effective, or which requires groundwater use or soil management restrictions; and

WHEREAS, the Legislature of the State of New York has declared that environmental easement shall mean an interest in real property, created under and subject to the provisions of Article 71, Title 36 of the New York State Environmental Conservation Law ("ECL") which contains a use restriction and/or a prohibition on the use of land in a manner inconsistent with engineering controls which are intended to ensure the long term effectiveness of a site remedial program or eliminate potential exposure pathways to hazardous waste or petroleum; and

WHEREAS, Grantor, is the owner of real property located at the address of 200 Upper Mountain Road in the City and Town of Lockport, Niagara County, New York 14094, known and designated on the tax map of the County of Niagara Section 108.13, Block 1, Lot 1, being the same as that property conveyed to Grantor by deed dated October 6, 2009 and recorded in the Office of the Niagara County Clerk as Instrument # 2009-19256, within which there is a parcel comprised of approximately 22.683± acres, and hereinafter more fully described in the attached Schedule "A" and on the Survey Map attached as Schedule "B" that was made by McIntosh & McIntosh, P.C. dated May 8, 2008, revised on June 23, 2008, July 3, 2008, November 20, 2008, December 9, 2009, April 7, 2010, March 17, 2011 and March 31, 2011 (the "Controlled Property"), both attached hereto and made a part hereof and

WHEREAS, the Commissioner does hereby acknowledge that the Department accepts this Environmental Easement in order to ensure the protection of human health and the environment and to achieve the requirements for remediation established at this Controlled Property until such time as

this Environmental Easement is extinguished pursuant to ECL Article 71, Title 36; and

NOW THEREFORE, in consideration of the covenants and mutual promises contained herein and the terms and conditions of Order On Consent Index Number B9-0553-99-06, Grantor grants, conveys and releases to Grantee a permanent Environmental Easement pursuant to Article 71, Title 36 of the ECL in, on, over, under, and upon the Controlled Property as more fully described herein ("Environmental Easement").

1. Purposes. Grantor and Grantee acknowledge that the purposes of this Environmental Easement are: to convey to Grantee real property rights and interests that will run with the land in perpetuity in order to provide an effective and enforceable means of encouraging the reuse and redevelopment of this Controlled Property at a level that has been determined to be safe for a specific use while ensuring the performance of operation, maintenance, and/or monitoring requirements; and to ensure the potential restriction of future uses of the land that are inconsistent with the above-stated purpose.

2. Institutional and Engineering Controls. The following controls apply to the use of the Controlled Property, run with the land are binding on the Grantor and the Grantor's successors and assigns, and are enforceable in law or equity against any owner of the Controlled Property, any lessees, and any person using the Controlled Property:

A. The Controlled Property may be used for commercial or industrial use as long as the following engineering controls are employed and the land use restrictions specified below are adhered to :

1. Implement and comply with all elements of the Department-approved Site Management Plan prepared by GZA GeoEnvironmental of New York dated April 2011 and as that plan may be modified by written approval of the Department ("SMP");

2. Restrict use of groundwater at the Controlled Property as a source of potable or process water without necessary water quality treatment as determined by the Niagara County Department of Health; and

3. Evaluate the potential for vapor intrusion for any buildings developed on the Controlled Property. Provision for mitigation (if determined to be needed by Grantee), such as installation of a vapor barrier and sub-slab vapor system or other engineering controls shall be implemented on all structures on the Controlled Property prior to occupancy; and

B. Grantor shall provide all persons who acquire any interest in the Controlled Property a true and complete copy of the SMP.

The SMP describes obligations that the Grantor assumes on behalf of Grantor, its successors and assigns. The Grantor's assumption of the obligations contained in the SMP which

may include sampling, monitoring, and/or operating a treatment system on the Controlled Property, and providing certified reports to the NYSDEC, is and remains a fundamental element of the Department's determination that the Controlled Property is safe for a specific use, but not all uses. Upon notice of not less than thirty (30) days, the Department in exercise of its discretion and consistent with applicable law may revise the SMP. The notice shall be a final agency determination. The Grantor and all successors and assigns, assume the burden of complying with the SMP and obtaining an up-to-date version of the SMP from:

Regional Remediation Engineer:
Region 9
NYS DEC
270 Michigan Avenue
Buffalo, NY 14203-2999

or

Site Control Section
Division of Environmental Remediation
NYS DEC
625 Broadway
Albany, NY 12233

C. The Controlled Property may not be used for a higher level of use such as unrestricted or restricted residential use and the above-stated controls may not be discontinued without an amendment or extinguishment of this Environmental Easement.

D. Grantor covenants and agrees that until such time as the Environmental Easement is extinguished in accordance with the requirements of Article 71, Title 36 of the ECL, the property deed and all subsequent instruments of conveyance relating to the Controlled Property shall state in at least fifteen-point bold-faced type:

This property is subject to an environmental easement held by the New York State Department of Environmental Conservation pursuant of Title 36 to Article 71 of the Environmental Conservation Law.

E. Grantor covenants and agrees that this Environmental Easement shall be incorporated in full or by reference in any leases, licenses, or other instruments granting a right to use the Controlled Property.

F. Grantor covenants and agrees that it shall annually, or such time as NYSDEC may allow, submit to NYSDEC a written statement by an expert the NYSDEC may find acceptable certifying under penalty of perjury that the controls employed at the Controlled Property are unchanged from the previous certification or that any changes to the controls employed at the Controlled Property were approved by the NYSDEC, and that nothing has occurred that would impair the ability of such control to protect the public health and environment or constitute a violation or failure to comply with the NYSDEC-approved Site Management Plan for such controls and giving access to such Controlled Property to evaluate continued maintenance of such controls.

3. Right to Enter and Inspect. Grantee, its agents, employees, or other representatives of the State may enter and inspect the Controlled Property in a reasonable manner and at reasonable times to assure compliance with the above-stated controls and restrictions.

4. Reserved Grantor's Rights. Grantor reserves for itself, its assigns, representatives, and successors in interest with respect to the Controlled Property, all rights as fee owner of the Controlled Property, including:

A. Use of the Controlled Property for all purposes not inconsistent with, or limited by, the terms of this Environmental Easement; and

B. The right to give, sell, assign, or otherwise transfer the underlying fee interest to the Controlled Property by operation of law, by deed, or by indenture, subject and subordinate to this Environmental Easement.

5. Enforcement

A. This Environmental Easement is enforceable in law or equity in perpetuity by Grantor, Grantee, or any affected local government, as defined in ECL Section 71-3603, against the owner of the Controlled Property, any lessees, and any person using the land. Enforcement shall not be defeated because of any subsequent adverse possession, laches, estoppel, or waiver. It is not a defense in any action to enforce this Environmental Easement that it is not appurtenant to an interest in real property; it is not of a character that has been recognized traditionally at common law; it imposes a negative burden; it imposes affirmative obligations upon the owner of any interest in the burdened property; the benefit does not touch or concern real property; there is no privity of estate or of contract; or it imposes an unreasonable restraint on alienation.

B. If any person intentionally violates this Environmental Easement, the Grantee may revoke the Certificate of Completion provided under ECL Article 27, Title 13 and 6 NYCRR Part 375 with respect to the Controlled Property.

C. Grantee shall notify Grantor of a breach or suspected breach of any of the terms of this Environmental Easement. Such notice shall set forth how Grantor can cure such breach or suspected breach and give Grantor a reasonable amount of time from the date of receipt of notice in which to cure. At the expiration of such period of time to cure, or any extensions granted by Grantee, the Grantee shall notify Grantor of any failure to adequately cure the breach or suspected breach. Grantor shall then have a reasonable amount of time from receipt of such notice to cure. At the expiration of said second period, Grantee may commence any proceedings and take any other appropriate action reasonably necessary to remedy any breach of this Environmental Easement in accordance with applicable law to require compliance with the terms of this Environmental Easement.

D. The failure of Grantee to enforce any of the terms contained herein shall not be deemed a waiver of any such term nor bar its enforcement rights in the event of a subsequent breach of or noncompliance with any of the terms of this Environmental Easement.

6. Notice. Whenever notice to the State (other than the annual certification) or approval from the State is required, the Party providing such notice or seeking such approval shall identify the Controlled Property by referencing the following information:

County, NYSDEC Site Number, NYSDEC Contract or Order Number, and the County tax map number or the Liber and Page or computerized system identification number.

Parties shall address correspondence to: Site No. 9-32-113
Office of General Counsel
NYSDEC
625 Broadway
Albany New York 12233-5500

Such correspondence shall be delivered by hand, or by registered mail or by certified mail and return receipt requested. The Parties may provide for other means of receiving and communicating notices and responses to requests for approval.

7. Recordation. Grantor shall record this instrument, within thirty (30) days of execution of this instrument by the Commissioner or her/his authorized representative in the office of the recording officer for the county or counties where the Controlled Property is situated in the manner prescribed by Article 9 of the Real Property Law.

8. Amendment. This Environmental Easement may be amended only by an amendment executed by the Commissioner of the New York State Department of Environmental Conservation and filed with the office of the recording officer for the county or counties where the Controlled Property is situated in the manner prescribed by Article 9 of the Real Property Law.

9. Extinguishment. This Environmental Easement may be extinguished only by a release by the Commissioner of the New York State Department of Environmental Conservation and filed with the office of the recording officer for the county or counties where the Controlled Property is situated in the manner prescribed by Article 9 of the Real Property Law.

10. Joint Obligation. If there are two or more parties identified as Grantor herein, the obligations imposed by this instrument upon them shall be joint and several.

IN WITNESS WHEREOF, Grantor has caused this instrument to be signed in its name.

GM Components Holdings, LLC

By: William McFarland
William McFarland

Title: Director, Remediation Services
General Motors LLC

Date: 9-1-11

Grantor's Acknowledgment

STATE OF Michigan)
) ss:
COUNTY OF Macomb)

On the 1st day of September, in the year 2011, before me, the undersigned, personally appeared William McFarland, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

Allicia Najor
Notary Public

ALLICIA NAJOR
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF MACOMB
My Commission expires April 3, 2015
Acting in the County of Macomb

THIS ENVIRONMENTAL EASEMENT IS HEREBY ACCEPTED BY THE PEOPLE OF THE STATE OF NEW YORK, Acting By and Through the Department of Environmental Conservation as Designee of the Commissioner

by: _____
Dale A. Desnoyers, Director
Division of Environmental Remediation

Grantee's Acknowledgment

STATE OF NEW YORK)
) ss:
COUNTY OF Albany)

On the 28th day of September, in the year 2011, before me, the undersigned, personally appeared Dale Desnoyers, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/ executed the same in his/her/ capacity as Designee of the Commissioner of the State of New York Department of Environmental Conservation, and that by his/her/ signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

_____
Notary Public - State of New York

David J. Chiusano
Notary Public, State of New York
No. 01CH5032146
Qualified in Schenectady County
Commission Expires August 22, 2014

RECORD AND RETURN TO:
Barry R. Kogut, Esq.
Bond, Schoeneck & King, PLLC
One Lincoln Center
Syracuse, New York 13202-1355

Address: 200 Upper Mountain Road, City of Lockport, Niagara County, New York.
Tax Map No: 108.13 – 1 – 1
Acreage: 22.683 ± acres.

SCHEDULE "A"
ENVIRONMENTAL EASEMENT AREA DESCRIPTION

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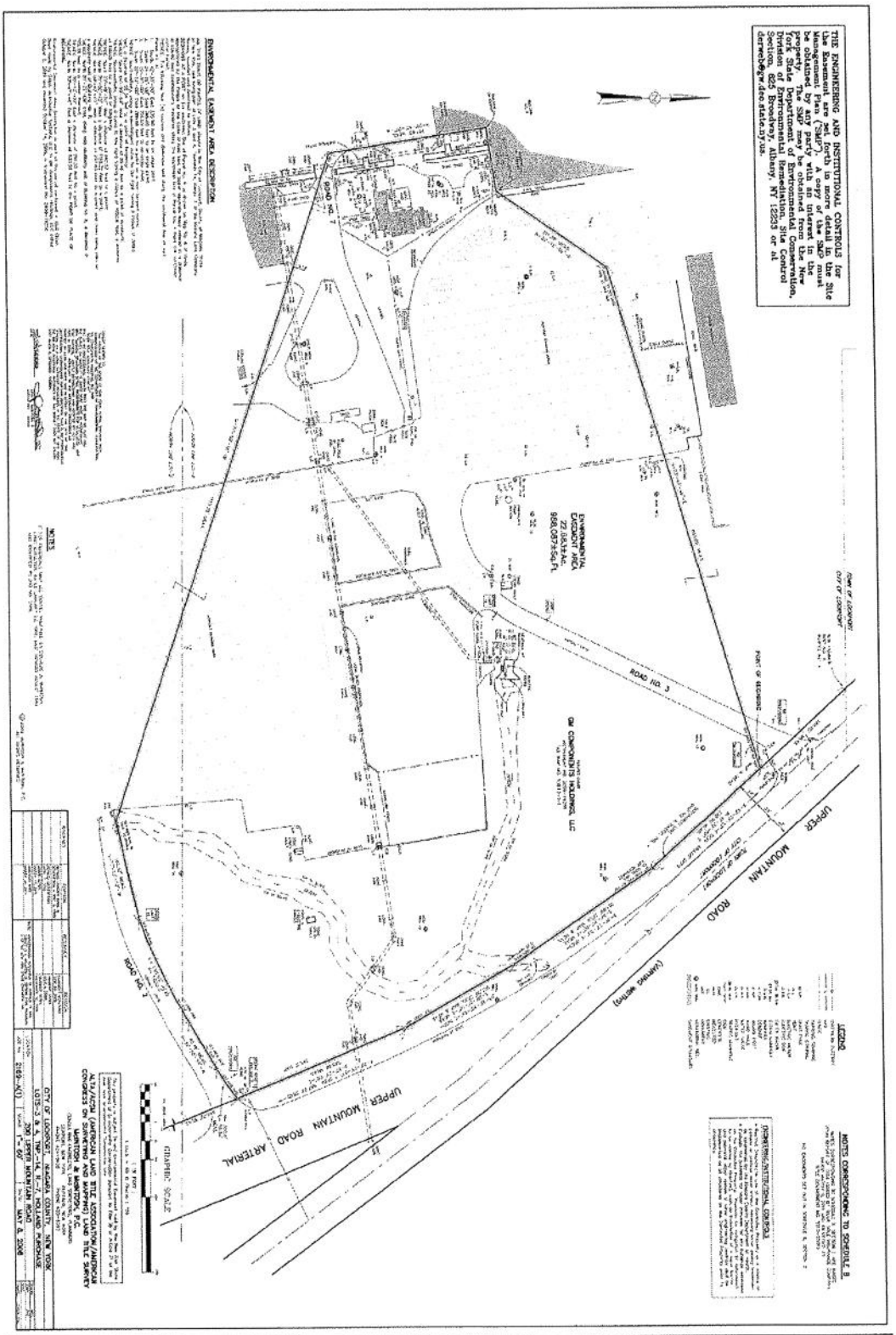
THENCE: North 73° - 47'– 46" East a distance of 833.02 feet to the POINT OR PLACE OF BEGINNING.

SURVEY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ROAD NO. 3
ROAD NO. 1
UPPER MOUNTAIN ROAD
(CAMBRIA MOTEL)
UPPER MOUNTAIN ROAD ARTERIAL
GRAPHIC SCALE
LEGEND
NOTES CORRESPONDING TO SCHEDULE B
ENVIRONMENTAL EASEMENT AREA
ALTA/ACSM (AMERICAN LAND TITLE ASSOCIATION/AMERICAN CONGRESS ON SURVEYING & MAPPING) LAND TITLE SURVEY
HARRISON & HARRISON, P.C.
CITY OF LOCKPORT, NIAGARA COUNTY, NEW YORK
LOTS 3 & 4, UPPER MOUNTAIN ROAD INDUSTRIAL PARK
MAY 8, 2006

NIAGARA COUNTY - STATE OF NEW YORK
WAYNE F. JAGOW - NIAGARA COUNTY CLERK
P.O. BOX 461, LOCKPORT, NEW YORK 14095-0461

COUNTY CLERK'S RECORDING PAGE
THIS PAGE IS PART OF THE DOCUMENT - DO NOT DETACH

RECEIPT NO. : 201195127

Clerk: TH
Instr #: 2011-17072
Rec Date: 10/06/2011 11:05:14 AM
Doc Grp: DEED
Descrip: MISCELLANEOUS
Num Pgs: 10

Party1: GM COMPONENTS HOLDINGS LLC
Party2: PEOPLE OF THE STATE OF NEW YORK COMMISSIONER OF DEPT OF ENVIRONMENTAL CONSERVATION
Town: TOWN OF LOCKPORT

Recording:

Cover Page	8.00
Recording Fee	32.00
Cultural Ed	14.25
Records Management - Coun	1.00
Records Management - Stat	4.75
TP584	5.00
Sub Total:	65.00
Transfer Tax	
Transfer Tax	0.00
Sub Total:	0.00
Total:	65.00

**** NOTICE: THIS IS NOT A BILL ****

***** Transfer Tax *****

Transfer Tax# : 969

Consideration: 1.00
Transfer Tax: 0.00

Record and Return To:

BARRY R KOGUT ESQ
BOND SCHOENECK & KING PLLC
ONE LINCOLN CENTER
SYRACUSE NY 13202-1355

NIAGARA COUNTY CLERK
WAYNE F. JAGOW

RECEIPT

Create Time: 10/6/2011 11:05:14 AM
RECEIPT # 201195127

Recording Clerk: TH
Account: cash2
Rec'd Frm: JUSTINE - CHICAGO
By Mail/In Person (M/P): P

Instr#: 2011-17072
DOC: MISCELLANEOUS
OR Party: GM COMPONENTS HOLDINGS LLC
EE Party: PEOPLE OF THE STATE OF NEW

DEEDMISC

Cover Page 1		$8.00
Recording Fee 9		$32.00
Cultural Ed 1		$14.25
Records Management - County	1	$1.00
Records Management - State	1	$4.75
TP584 1		$5.00

Receipt Summary

TOTAL RECEIPT: ---->	$65.00
TOTAL RECEIVED: ---->	$65.00
Cash Back	$0.00

PAYMENTS

Check # 161780 ->	$65.00

BOND SCHOENECK & KING PLLC

APPENDIX D

THE ENVIRONMENTAL QUALITY COMPANY®

Generator Approval Notification

March 30, 2011

Customer: U S INDUSTRIAL TECHNOLOGIES INC
Fax: (734) 462-4114

ENVIRONMENTAL MANAGER
GM COMPONENTS HOLDINGS LLC
200 UPPER MOUNTAIN ROAD
LOCKPORT, NY 14094

This Generator Approval Notification acknowledges the acceptability of waste material(s) into the EQ environmental protection facility identified below and ensures that this facility has the appropriate permit(s) issued by federal and state regulatory agencies to properly transport, treat, and/or dispose of the waste material(s).

EQ FACILITY: EQ Detroit, Inc. (MID980991566)
1923 Frederick, Detroit, MI 48211

Approval Number: C117378DET

Generator EPA ID: NYR000169342 **Expires On:** 03/24/2012
Waste Common Name: INVESTIGATION WATER
Comments:

Primary Waste Code: F002
Secondary Waste Codes: D040

The Approval(s) listed above are based upon characterization information supplied to EQ by the Customer and the generator (if other than the Customer). The Customer is ultimately responsible for the accuracy and completeness of all such information, whether provided by the Customer or the generator. The Customer must notify the EQ Resource Team immediately upon knowledge of any changes to this information. This Approval and all wastes which are transported, delivered, or tendered to EQ under this Approval shall be subject to the attached Standard Terms and Conditions.

The Approval(s) will expire on the date(s) noted. Any new Approvals obtained from EQ on future business will be valid for a period of one (1) year from the date of issuance. Within 60 days of the Approval Expiration Date, you will be notified of the requirements for recertification.