Responsiveness Summary

1001 East Delavan Street Site
(former American Axle/General Motors Saginaw Facility)
Site Number: C915196B

Remedial Investigation Work Plan
Submitted by
East Delavan Properties, LLC

March 2021

Prepared by
Division of Environmental Remediation

New York State Department of Environmental Conservation

RESPONSIVENESS SUMMARY

1001 East Delavan Street Site (former American Axle/General Motors Saginaw Facility)
Site No: C915196B

Buffalo, New York

Remedial Investigation Work Plan submitted by Riverview Innovation &Technology Campus, Inc.

A Remedial Investigation Work Plan (RIWP) for the 1001 East Delavan Street Site (Site Number C915196B) Brownfield Cleanup Program site was submitted to the New York State Department of Environmental Conservation (DEC) by East Delavan Properties, LLC. on June 22, 2020. After an initial review of the work plan by DEC, a revised RIWP was released for a 30-day public comment on June 25, 2020. The comment period was extended to end on August 24, 2020.

DEC received three comment letters that consisted of approximately 23 individual comments. One of the comment letters included comments compiled by a third-party consultant. Additionally, DEC received 17 individual emails. All comments were assessed by DEC for technical and regulatory applicability and, where appropriate, incorporated into the final RIWP.

The following is a summation of comments and questions received, and the DEC's response to those comments and questions.

Comment 1: For Section 3.3.3, the validity of not sampling the Scajaquada Interceptor and evaluation performed by Energy Solutions Consortium (ESC) were questioned and it was noted that a sewer exposure pathway should be evaluated.

Response 1: The ESC report was a condensed summary of previous investigations. No investigation work was performed by ESC. The revised work plan includes sampling of sediment inside the 5X9 sewer and a sewer exposure pathway evaluation will be completed as part of the Remedial Investigation (RI).

Comment 2: For Section 4.1.3, the Conceptual Site Model (CSM) as presented does not acknowledge dissolved metal contaminants in groundwater. The RI should consider all metal exceedances in groundwater.

Response 2: The revised RIWP includes analysis of metals and all exceedances will be considered in the data evaluation.

Comment 3: For Section 4.1.3, the RI should consider all pesticide exceedances in groundwater. The CSM as presented does not acknowledge dissolved pesticides discovered in onsite groundwater. The RIWP should consider all exceedances in groundwater and potential for offsite migration of contaminants. The DEC must ensure that there is offsite groundwater sampling in homes and yards of residents in adjacent neighborhoods,

Response 3: The revised RIWP includes analysis of pesticides and all exceedances will be considered in the data evaluation and site characterization. The BCP volunteer is not required to sample offsite areas. If the groundwater data for the site suggests that there is a potential for offsite migration, the DEC may implement offsite sampling of groundwater for contaminants of concern that may have emanated from the site.

Comment 4: For Section 4.1.4, the influence of groundwater collection at the 250 Colorado Street Site should be considered when evaluating groundwater flow at the BCP site.

Response 4: The revised RIWP includes analysis of the influence of groundwater flow patterns from the 250 Colorado Street Site groundwater collection system.

Comment 5: For Section 4.1.4, the existing conditions CSM does not consider or address the flow of groundwater to the 5x9 sewer, interceptor or drain. The RIWP should also consider all extraction points and groundwater extraction when discussing existing conditions and in the CSM.

Response 5: The RIWP includes a discussion of the influence on groundwater flow from the 5x9 sewer, interceptor and drain. The RIWP requires further evaluation of groundwater flow. This evaluation will include groundwater level data from the new monitoring well in the fill along the filled in former creek channel, additional new wells in several locations around the site and all of the existing wells that form the monitoring network.

Comment 6: The RIWP should include sampling of the 5x9 sewer and new modelling of contaminant migration from the 5x9 sewer to the Scajaquada Creek Drain.

Response 6: BCP and DEC guidance requires the volunteer to complete a qualitative off-site exposure assessment for human health and the environment. Sampling of sediments in the 5x9 sewer has been added to the RIWP and data collected will be used for this assessment. The qualitative exposure assessment may require contaminant transport modelling, if deemed necessary.

Comment 7: For Section 4.2, the RIWP does not address historic sources of Light Non-Aqueous Phase Liquids (LNAPL) and further LNAPL delineation is required.

Response 7: The RIWP will evaluate the presence of LNAPL sitewide and includes further delineation of LNAPL in previously identified areas.

Comment 8: For Section 4.2, the CSM in the RIWP assumes LNAPL data from historic bedrock wells to be accurate and generally unchanging. A discussion is presented on the inability of the current bedrock wells to monitor LNAPL in bedrock.

Response 8: The presumption that LNAPL conditions remain unchanging is based upon the cessation of manufacturing at the site and that the likely sources which contributed to the LNAPL currently at the site have been removed. Understanding the full vertical and horizontal extent of contamination at the site is a fundamental requirement of the BCP. The RIWP requires an evaluation of monitoring wells installed at various depths throughout the site, including bedrock wells in areas where LNAPL was observed in overburden wells. The proposed monitoring well network will be utilized to determine the nature and extent of LNAPL sitewide, including in bedrock. With respect to the ability of bedrock wells to assess the presence of LNAPL, if the phreatic groundwater surface/LNAPL interface in a bedrock monitoring well intersects the bedrock well screen, LNAPL should accumulate in the well and can be monitored in that well. If the phreatic groundwater surface/LNAPL interface in a bedrock monitoring well does not intersect the bedrock well screen, LNAPL is not likely within the fractured bedrock zone, but may exist in the soil formation above. If the phreatic groundwater/LNAPL interface exists in the screened portion of an overburden well, LNAPL would be detected in the overburden well.

Comment 9: For Section 4.2, the CSM presented in the RIWP indicates that there are no complete pathways at the site. This statement should be deleted and refer to specific comments to the RIWP Scope of Work.

Response 9: DEC agrees with deleting this statement in the CSM and that it cannot be substantiated with existing data. The statement has been removed from the RIWP. The expanded scope of the RI will further determine conditions and pathways at the site and validity of this statement.

Comment 10: For Section 5.3, the placement of boring SB-BCP15 was deemed questionable and that the boring should be located near or in the fill of the former Scajaquada Creek open channel.

Response 10: The location of the boring was revised and a new monitoring well will be installed in the approximate location of the former creek channel so that the nature and character of the fill, and influence on groundwater quality and flow can be assessed.

Comment 11: For Section 5.4, the groundwater assessment claims that the existing groundwater monitoring network has provided horizontal and vertical impacts at the site. This may be an overstatement and should be toned down.

Response 11: DEC agrees that the existing site groundwater data only partially characterizes the site. The groundwater investigation component of the RIWP expands

groundwater characterization to address potential data gaps in groundwater at the BCP site.

Comment 12: For Section 5.4.1, an interim step of assessing the presence of LNAPL during the installation of new bedrock wells was suggested, including monitoring soil cuttings for free oil, temporarily halting the boring at the top of bedrock and leaving the boring open for a period of 24 hours to allow the accumulation of LNAPL before proceeding. Additionally, any LNAPL found in existing bedrock wells should be evacuated and monitored for any additional accumulation. If LNAPL reappears, the mechanism for its reappearance should be evaluated.

Response 12: The BCP Volunteer has added an interim step to assess the presence of LNAPL in new bedrock monitoring wells. Borings will be advanced to the clay/bedrock interface. Soils will be recovered for lithological characterization, field screening for vapors and to observe the materials for the presence of LNAPL. All observations and measurements will be logged in the field notebook. If staining or LNAPL is observed, a portion of the soil sample with visual evidence of LNAPL will be placed in a jar with water to allow observation of separate phase liquids. A companion fill or clay well will be installed if any LNAPL was identified in the soil column screened during installation of the bedrock replacement wells. If necessary, these wells will be offset from the companion bedrock replacement well by a minimum of 5-feet and installed in accordance with the fill/clay well procedures.

Comment 13: For Section 5.4.2, an interim step of assessing the presence of LNAPL during the installation of new overburden wells was suggested including monitoring soil cuttings for free oil, stopping the boring at the top of bedrock and leaving the boring open for a period of 24 hours to allow the accumulation of LNAPL. If LNAPL appears, the boring should be advanced into bedrock to construct a new bedrock well to monitor groundwater and LNAPL accumulation in bedrock. A companion overburden well should be installed to monitor groundwater LNAPL accumulation in the overburden.

Response 13: The BCP Volunteer will add the interim step described in Response 12 to assess the presence of LNAPL in new overburden monitoring wells. The need for installation of a companion bedrock well will be evaluated at that time.

Comment 14: For Section 5.4.3, full analysis of groundwater is requested for specific existing wells.

Response 14: Any existing wells not previously sampled during the preliminary scoping evaluation will be sampled and the analysis will be for the full suite of parameters. Also, any new wells will be sampled and the analysis will be for the full suite of parameters. Wells sampled as part of the preliminary scoping evaluation do not require resampling and analysis at this time.

Comment 15: For Section 7 concerning the Scope of the Remedial Investigation, the RIWP does not recognize or plan to confirm the status of the active Scajaquada Drain

pathway to Hoyt Lake and requests low and high flow event sampling in the 5x9 sewer, at close by locations in the Scajaquada Interceptor Sewer and upstream and downstream locations in the Interceptor Sewer.

Response 15: The Scajaquada Interceptor Sewer does not have any connections near the BCP site that may result in overflows to Hoyt Lake. The 5x9 sewer has an overflow that is connected to the Scajaquada Drain which eventually flows to Hoyt Lake. The revised RIWP includes sampling of sediments in the 5x9 sewer.

Comment 16: For Section 7 concerning the RI report, the data from the sewer sampling should be used in a sewer model to assess PCB contaminant migration through the Scajaquada Drain to Hoyt Lake.

Response 16: BCP guidance requires a qualitative exposure assessment for human health and the environment. Sampling of sediments in the 5x9 sewer has been added to the RIWP and data collected will be used for this assessment. The exposure assessment may involve a qualitative contaminant transport evaluation, if deemed necessary.

Comment 17: For Section 7, the groundwater elevation data from the 250 Colorado Street site should be considered in assessing groundwater flow on the BCP site considering the influence to groundwater flow that the groundwater collection system may have in the surrounding area.

Response 17: Groundwater elevation data from the 250 Colorado Street site will be collected and considered when assessing BCP site hydrogeology.

Comment 18: For Section 7, Green Remediation should be applied in developing remedial alternatives. If an alternative that involves allowing location stable LNAPL to remain on-site, an alternative that can degrade the LNAPL in-place to a non-toxic condition should be considered.

Response 18: Green Remediation principles are to be considered in the development of remedial alternatives for all BCP sites. Generally, the preferred remedial alternative for LNAPL would be the removal and off-site disposal of free LNAPL to the extent feasible. Alternatives to address LNAPL residual bound to soil particles will be evaluated as deemed feasible and appropriate for the site based on the results of the remedial investigation.

Comment 19: It is uncertain if implementation of the RIWP will result in remediation necessary to protect human health and the environment. There is a concern that other portions of the former General Motors/American Axle complex that were previously carved out are not being addressed as part of global effort for the former complex.

Response 19: The footprint of the former General Motors/American Axle facility is covered under one of three remediation sites including the GM Saginaw superfund site

(Site No. 915152), the American Axle superfund site (915196) and the 1001 East Delevan BCP site (C915196B).

Prior to ownership by East Delavan Properties, the Saginaw site was remediated to be protective of human health and the environment in accordance with an approved RAWP and is currently in Site Management. The remedy in place at the Saginaw site has been deemed protective of human health and the environment and no further action is necessary beyond site maintenance and monitoring activities. Documents related to the investigation, remediation and management of the Saginaw site (915152) are available on DEC's public access document portal (DECinfo Locator).

https://www.dec.ny.gov/data/DecDocs/915152/.

A groundwater pump and treat system has been installed at the American Axle superfund site to remove free LNAPL from the ground and prevent PCB contaminated LNAPL and groundwater from entering the 5x9 sewer that traverses the site. There are currently no remaining migration or exposure pathways on the American Axle superfund site, therefore the interim pump and treat system is protective of human health and the environment. Documents related to the investigation, remediation and management of the American Axle superfund site (915196) are available on DEC's public access document portal (DECinfo Locator).

https://www.dec.ny.gov/data/DecDocs/915196/.

The 1001 East Delevan Street BCP site encompasses the remainder of the former GM/American Axle complex. The results of the pending comprehensive investigation will determine impacts and includes an environmental assessment. A remedial investigation report and alternatives analysis report (RI/AAR) will be developed and released for public comment prior to approving a final and implementing a final remedy that will be fully protective of public health and the environment. Documents related to the investigation, remediation and management of the 1001 East Delevan Street BCP site (915196B) are available on DEC's public access document portal (DECinfo Locator).

https://www.dec.ny.gov/data/DecDocs/C915196B/.

Comment 20: Involvement of a Community Advisory Board composed of local residents and community stakeholders was requested to guide and offer support in the development of a comprehensive site remediation plan.

Response 20: DEC has a long history of working closely with the Delavan-Grider community and has participated in multiple community information sessions at the Delevan-Grider Community Center as part of our enhanced public outreach at this site. DEC will continue engaging the Delavan-Grider community and will continue to enhance its citizen participation efforts through robust and direct engagement in order to remain

responsive to community interests and concerns. The extended 60-day public comment period on the RIWP and issuance of this responsive summary is part of the enhanced public participation process. Also, once the site investigation is completed, DEC will host a public meeting, either in-person or remotely, for the Delavan-Grider community to discuss details of the site investigation and proposed final site remedy – a meeting that is not required under the State's Brownfield Cleanup Program, but which we know is important to keep our lines of communication open.