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Re: Storm Sewer Sampling Report

BCP Sites # C932138, C932139, C932140

GM Components Holdings 200 Upper Mountain Road

Lockport, NY 14094

Dear Glenn:

On behalf of GM Components Holdings (GMCH), GZA GeoEnvironmental of New York (GZA) has prepared this report to provide an update on the storm sewer sampling activities completed to date at the GMCH Lockport facility located at 200 Upper Mountain Road, Lockport, New York (Site). The sampling was completed to assess if volatile organic compound (VOC) impacted groundwater may be infiltrating the storm sewer system at locations where the storm sewer piping is present at or below the groundwater table.

Storm water data provided for Outfalls D002 and D003 (see Figure 1) in the Brownfield Cleanup Program (BCP) Remedial Investigation Reports (RIR; Haley & Aldrich (H&A)/GZA, November 2011) for Buildings 7, 8 and 10 indicated that chlorinated VOCs are present in the storm water discharge from the GMCH Facility. The storm water data provided in the RIR was from high-flow conditions, meaning that storm water was being discharged through the outfalls to the swale present on-site. We note that under low-flow conditions, storm water is diverted to the Lockport POTW and does not discharge through the outfalls.

DRAFT Remedial Work Plans (RWPs; H&A/GZA, December 2011) submitted to the New York State Department of Environmental Conservation (NYSDEC) for BCP Sites Buildings 7, 8 and 10 proposed conducting an assessment of potential groundwater infiltration into the storm sewer system and to take corrective measures as necessary.

A Storm Sewer Sampling Work Plan (SSSWP) was developed to perform the storm sewer sampling proposed in the DRAFT RWPs. NYSDEC reviewed the SSSWP and provided comments in a letter dated August 2, 2012. A Revised SSSWP was prepared, submitted to NYSDEC for review and approved by NYSDEC in a letter dated August 23, 2012. NYSDEC, in a letter dated September 20, 2012, stated that a Decision Document related to the RWPs could not be issued at this time as it unknown if a remedy to address



groundwater infiltration will be necessary and any remedy would need to be included in the Decision Document.

This investigation of the storm sewer system was conducted to determine if chlorinated VOC-impacted groundwater present on-site is the source of the chlorinated VOCs identified in the storm sewer discharge and to identify potential location(s) of infiltration.

STORM SEWER SAMPLING ACTIVITIES

The investigation involved water sample collection from select storm sewer structures (i.e., catch basins, manholes (MHs) or piping) where sampling specific structure(s) may provide information to assess potential infiltration locations and/or exclude portions of the storm sewer system as an area of concern. Figure 1 shows the storm sewer system layout at the GMCH Lockport facility.

Prior to the first sampling event in August 2012, Lockport had experienced a relatively dry summer. According to the website wunderground¹, the weather station located at the Niagara Falls Airport in Niagara Falls, New York (KIAG) registered less than 3 inches of rain between June 21 (first day of summer) and August 30, 2012 (first day of sampling). According to the historic weather data from this weather station for this same date interval, the average rain fall for the past 10 years was about 7 inches.

Groundwater elevations were measured at select monitoring wells within the storm sewer sampling area after the first sampling event. The groundwater measurements are depicted as groundwater contours shown on Figure 2. A comparison was done of the groundwater contours and the elevations of the various storm sewer components. The storm sewer component elevations were determined from a drawing provided by GMCH or from measurements collected from select components in the field. These elevations are provided on Table 1. The portions of the storm sewer system highlighted in orange on Figure 3 represent portions of the system that are located at or below the groundwater elevation based on the comparison completed.

The storm sewer sampling discussed in this report occurred in three (3) events. A total of 26 different storm sewer structures were sampled as shown on Figure 3. The sampling events were not conducted after significant storm water runoff was generated or during snow melt. Water at Outfalls D002 and D003, at the time of the sampling events, was being diverted to the Lockport POTW under low-flow conditions.

¹ Wunderground website for summary for weather from June 21, 2012 through September 12, 2012. http://www.wunderground.com/history/airport/KIAG/2012/6/21/CustomHistory.html?dayend=31&monthend=8&yearend=2012&req_city=NA&req_state=NA&req_statename=NA



The following is a summary of the three (3) sampling events.

- August 30 & 31, 2012: 15 locations; MH-1 through MH-6 and MH-8 through MH-15. MH-7 could not be opened and was not sampled. A tap water sample was also collected from inside Building 7A.
- October 5, 2012: 9 locations; MH-6 was resampled, MH-16 through MH-21, Outfall D002 and Outfall D003.
- January 4, 2013: 4 locations; MH-22 through MH-25.

The following scenarios were encountered during the sampling.

• No flow was observed entering into the structure; the water sample was collected from the standing water within the bottom of the structure.

• Flow was observed from one specific pipe entering into the structure; the water sample was collected from that pipe.

• Flow was observed from multiple pipes entering into the structure; the water sample was collected from water accumulated with the bottom structure.

• MH could not be opened; the water sample was collected through opening in the cover from water within the bottom of the structure.

MH-6

• MH consisted of a pipe flowing through bottom; the water sample was collected from the flow through the structure.

• Flow was observed from one specific pipe entering into the structure but the pipe inverts were below the water level within the structure; the water sample was collected from water accumulating within the structure.



In addition to sample collection, observations of the structures sampled were made and recorded (e.g., sheen observed, organic vapor meter readings, flow within the structure, pipe orientation, etc.). These observations are documented on Table 1.

The storm water sampling was conducted by opening the selected structure and placing a pre-cleaned polyethylene dip cup into the structure to collect the sample for analysis. Samples were collected for VOCs via EPA Method 8260 Target Compound List (TCL) and Total Oil and Grease (O&G) via EPA Method 1664a.

Samples identified as Outfall D002 and D003 were collected from the discharge of the storm sewer pipes upstream of the actual outfall structure locations. These samples were collected while under low-flow conditions, meaning flow exiting the pipes upstream of the outfall structure was being diverted to the Lockport POTW and not discharging through the outfall.

Additionally, one water sample was collected from a bathroom sink faucet in Building 7A. The sample was analyzed for VOC via EPA Method 8260 TCL only. The purpose of this sample was to help determine if potable water makes up some or all of the flow present in the storm sewer system under dry weather or drought-like conditions. Untreated potable water is used in the fire suppression system throughout the facility. Leaks from the underground portions of the fire suppression system may be infiltrating into the storm sewer system.

SAMPLING RESULTS

The detected compound concentrations from the VOC and oil and grease samples are summarized on Figure 4 and discussed in the analytical quality assessment and validation reports in Appendix A [Note: Table 3 in the analytical quality assessment and validation reports provides the analytical data in a tabular format]. The analytical results are discussed below.

COMPOUNDS OF CONCERN

We note that compounds of concern (COCs), as identified in previous soil and groundwater investigations throughout the Site, are chlorinated solvent compounds, tetrachloroethene (PCE) and trichloroethene (TCE), and their associated breakdown products; cis-1,2-dichloroethene (cis-DCE), 1,1-dichloroethene (1,1-DCE), trans-1,2-dichloroethene (trans-DCE), and vinyl chloride (VC). The chlorinated solvents were used primarily in historical degreasing operations.

COCs were detected in 17 of the 26 storm sewer locations sampled as part of the storm sewer investigation. The analytical results are summarized on Figure 4. Figure 5 identifies the locations where COCs were detected in the storm sewer locations sampled.



The highest total COC concentrations, those greater than 500 ppb, were detected at four (4) sampling locations.

- MH-6 (581 ppb), MH-17 (1,689) and MH-21 (1,051) are associated with the storm sewer servicing Building 10 and the area between Buildings 7 and 10. Elevated concentrations of COCs have been detected in the monitoring well inside Building 10 (MW-10-1) and five (5) wells located between Building 7 and 10 (MW-7-A-6, MW-7-7 MW-7-8, MW-10-2 and MW-10-3). There is a potential that the elevated COCs detected at MH-6, MH-17 and MH-21 is due to groundwater infiltration and should be further evaluated. We note that there was no flow into MH-17 at the time of the sampling. The detections of the COCs in MH-17 may be due to impacted sediment in the bottom of the structure or infiltration into the manhole itself.
- MH-10 (1,033 ppb) is located along the main west-east orientated storm sewer line running through the GMCH facility located near the southeast corner of Building 8. Storm water from Building 10, northern portion of Building 7, southern portion of Building 8 and exterior storm water runoff from between the main buildings flow through MH-10.

COC concentrations at the other 13 sampling locations ranged from 4.2 ppb (MH-4) to 265 ppb (MH-16). These locations are primarily located east of Buildings 9 and 10. A few locations of note are as follows.

- COC concentrations detected at MH-4, MH-5, MH-14 (associated with Building 8 storm sewer system) have a similar COC concentration profile as the nearby monitoring wells associated with Building 8 (MH-4 vs MW-8-1, MH-5 vs MW-8-3, and MH-14 vs MW-8-4).
- COC concentrations detected in MH-1 (222 ppb), MH-2 (25 ppb) and MH-9 (6 ppb) (associated with Building 7) decrease from west to east, similar to groundwater COC concentrations from previous investigations. We note that there was no flow into MH-1 and MH-9 at the time of the sampling. The detections of the COCs may be due to impacted sediment in the bottom of the structure or infiltration into the manhole itself.
- COC concentrations increase along the main west-east orientated storm sewer line running through the GMCH facility from MH-19 (non-detect) to MH-8 (242 ppb) to MH-10 (1,034 ppb), but decreases at MH-13 (158 ppb) and Outfall D002 (257 ppb). This decrease may be attributed to dilution from other storm sewer lines from Building 6 and northern portion of Building 8.

No COCs were detected above method detection limits at nine (9) manhole locations (MH-3, -12, -15, -19, -20, -22, -23, -24, and -25).



OTHER VOCS DETECTED

1,1,2-trichloro-1,2,2-trifluoroethane (Freon 113) was used in a limited number of degreasers inside Building 8 for a short period of time (1986 to 1994). It was detected at five (5) sampling locations. These five (5) locations are either directly associated with the Building 8 storm sewer system (MH-5 and MH-14) or are downgradient receivers of Building 8 storm water (MH-10, MH-13, and Outfall D002).

Acetone was detected at low concentrations at two locations (MH-19 (3 ppb) and MH-23 (6.6 ppb) and it was the only compound detected above method detection limits at these locations. Acetone is not a concern, due to its low level detections, limited number of detections and its common appearance as a laboratory contaminant.

Tap Water Sample results indicated the presence of bromodichloromethane, bromomform, dibromochloromethane and chloroform. These four (4) compounds were detected in the sample collected from MH-12 and chloroform was detected in MH-1 and MH-16. This may indicate that tap water is infiltrating the storm sewer system (i.e., leaking fire suppression system or leaking water line).

OIL & GREASE

Oil & Grease was detected at eight (8) sample locations (MH-1, -2, -3, -4, -6, -10, -11, and -16) with detected concentrations ranging from 2 ppb to 5.4 ppb at an average of 3 ppb. Three (3) of the locations are associated with the Building 7 storm sewer system (MH-1, MH-2, and MH-11). One (1) location (MH-4) is upgradient of Building 8 and downgradient of Building 9. Three (3) locations are associated with Building 10 (MH-3, MH-6 and MH-16). One (1) location is associated with the main west-east orientated storm sewer line running through the facility (MH-10).

Storm Sewer Video Review

Although not part of the work plan, GMCH provided GZA with storm sewer videos for review. The videos were from storm sewer inspections completed between May 1994 and May 2002 by various contractors. Figure 5 identifies the approximate location of the storm sewer lines that were video inspected (shown in green). GZA reviewed the videos to assess the conditions of the storm sewers at the time of the video and if groundwater infiltration is potentially occurring. The quality of the videos reviewed varied. Review of the videos identified the following.

- Grout at pipe connections was in poor condition or missing.
- Pipe joint separation.
- Infiltration from pipe bedding from pipe lateral crossing storm sewer.
- Infiltration at section of missing pipe wall.
- Sediment or standing water within pipes.
- Infiltration into manhole from pipe bedding beneath pipe.
- Longitudinal cracks in pipes.



CONCLUSIONS & RECOMMENDATIONS

Based on the storm sewer sampling results and the groundwater elevations in the vicinity of the structures sampled, groundwater infiltration is likely occurring at some locations. The areas of potential groundwater infiltration are shown on Figure 5. Existing storm sewer video review indicated infiltration is potentially occurring at pipe joints, missing pipe wall sections, or cracks in the pipes within the storm sewer system.

COCs were detected in some structures (MH-1, MH-9 and MH-17) where there was no flow at the time of the sampling and water was collected from the bottom of structures. These detections may be due to groundwater infiltration into the manhole structures. Alternatively, these detections may have resulted from the presence of COC-impacted sediments within some pipes and bottom of the structures from non-infiltration sources (i.e. COC releases to storm sewers which have impacted sediments present in low-lying or sump areas of the structures).

We recommend conducting additional investigations. These additional investigations will include:

- storm sewer sample collection during high-flow conditions; and
- detailed investigation of the storm sewer system associated with Building 10 and the area between Buildings 7 and 10.

High-flow Sampling

The storm sewer sample collection during high-flow conditions will involve sampling select locations when storm water is being discharged to the on-site drainage swales (greater than 200 gallons per minute). We suggest sampling MH-1, -4, -5, -6, -8, -10, -11, -16, -17, -21, Outfall D002 discharge and Outfall D003 discharge during a high-flow condition, in addition to collecting groundwater depth measurements from select monitoring wells during the sampling. This sampling will assist in evaluating the cause of the COCs detected during storm water discharge events currently occurring at the GMCH facility.

Storm Sewer System Associated with Building 10 and the Area Between Buildings 7 & 10

The storm sewer sampling results indicate that some of the highest COC concentrations were detected in the storm sewers associated with Building 10 and the area between Buildings 7 &10 (e.g., MH-6, -17 and -21). These storm sewer pipes and structures, particularly the exterior pipes between Building 7 and 10 from MH-6 to MH-16 have not been camera surveyed. Also, MH-17 represents sampling locations where COCs were detected in a structure where no flow was occurring at the time of the sampling event.

The detailed investigation would involve storm sewer pipe and structure clean out, camera survey, storm water resampling, and evaluation of storm sewer repair methods based on the camera survey and resample findings (if necessary). Conducting the detailed



investigation in this portion of the GMCH facility would cause minimal disturbance to the facility, as this location is mainly exterior and there are no major manufacturing operations occurring within the area.

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

Respectfully,

GZA GeoEnvironmental of New York

Christopher Boron Senior Project Manager Bart A. Klettke, P. E. Associate Principal

Attachments: Figure 1 – Site Plan

Figure 2 – Groundwater Contour Map

Figure 3 – Strom Sewer Sampling Locations & Sewer Locations At

or Below Groundwater

Figure 4 – Storm Sewer Sampling Results

Figure 5 – Locations of Detected COCs & Storm Sewer Videos

Table 1 – Storm Sewer Sampling Summary

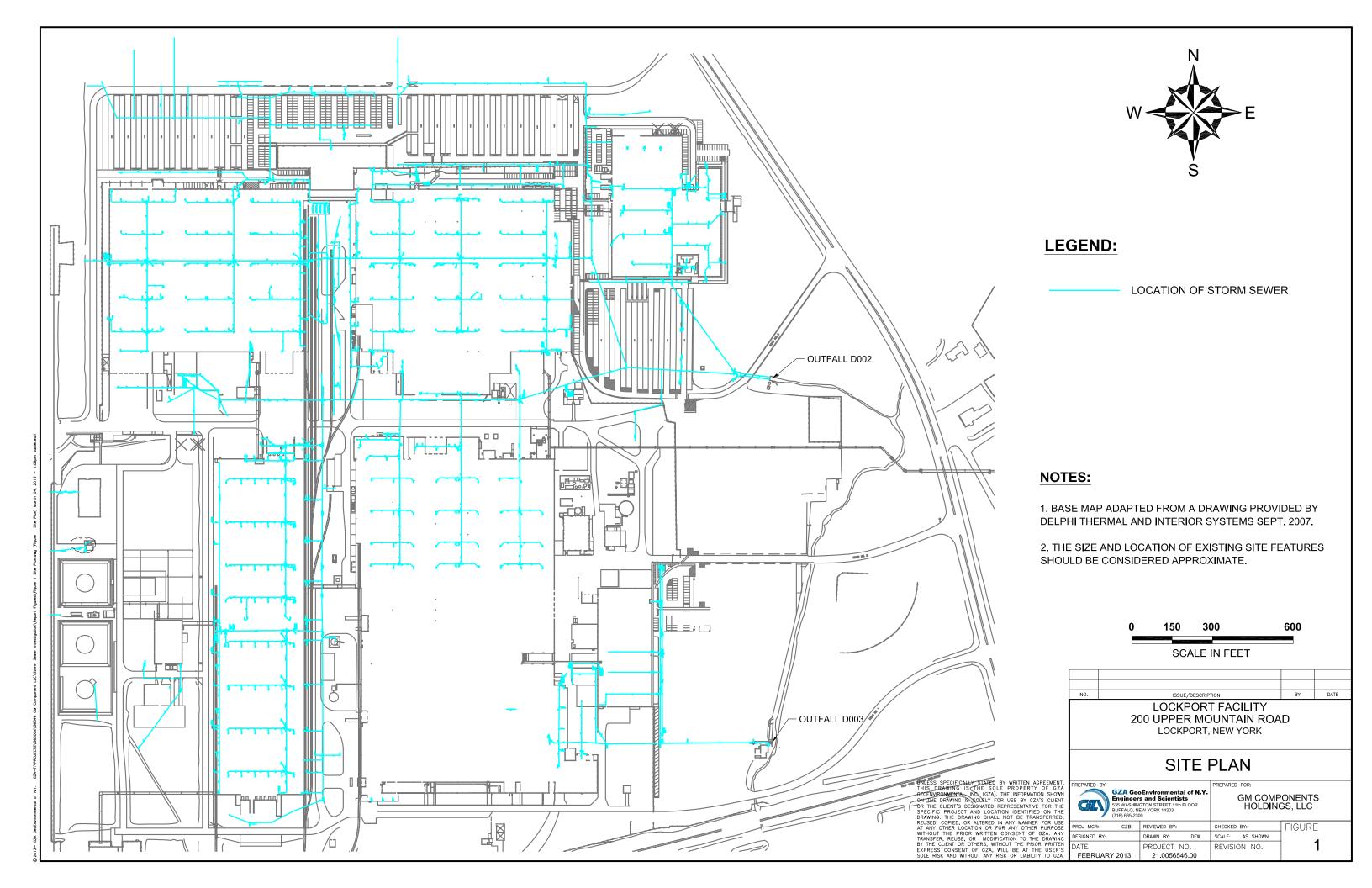
Appendix 1 - Analytical Quality Assessment and Validation Reports

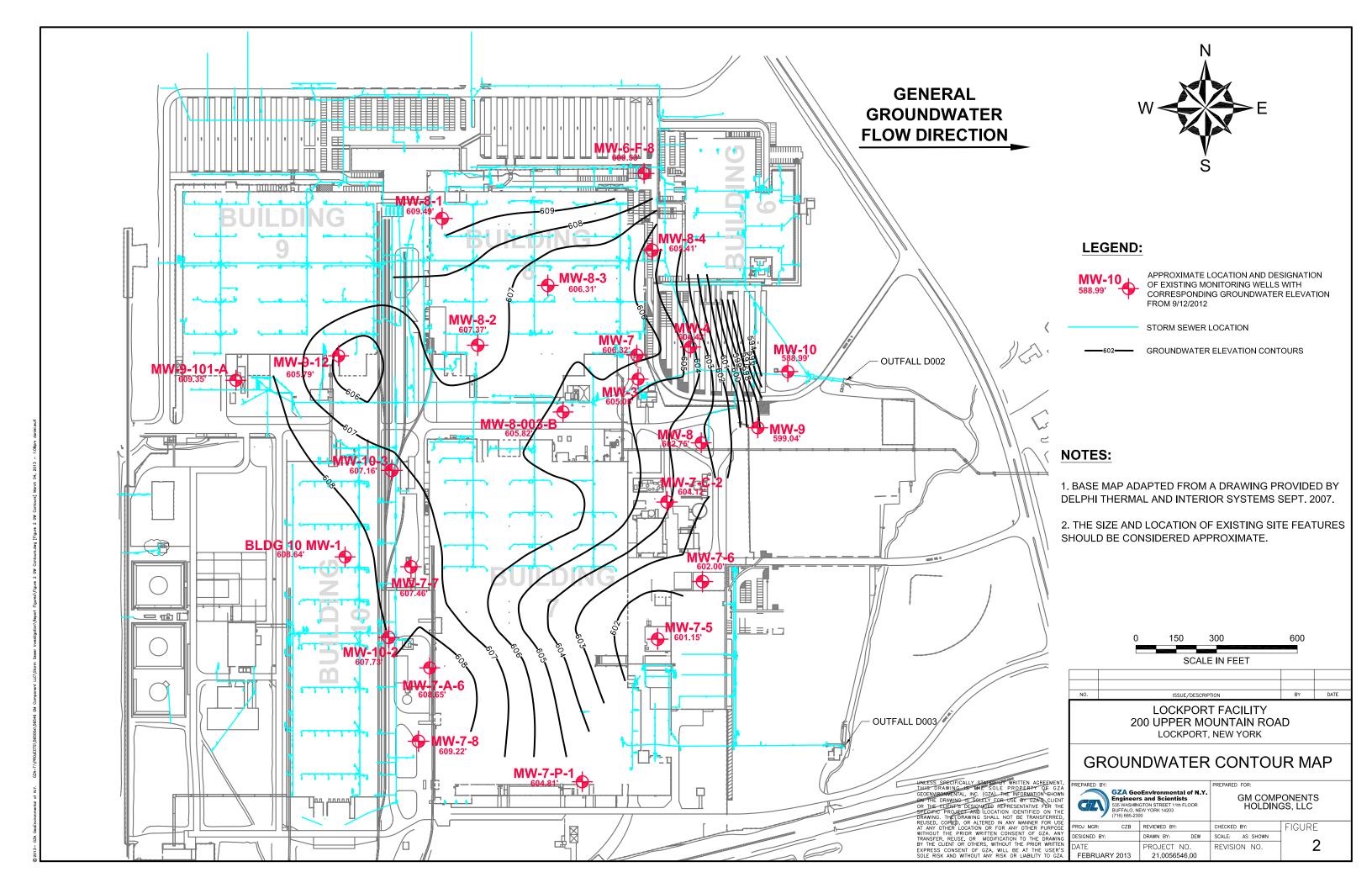
Cc: James Hartnett (GM, electronic copy)

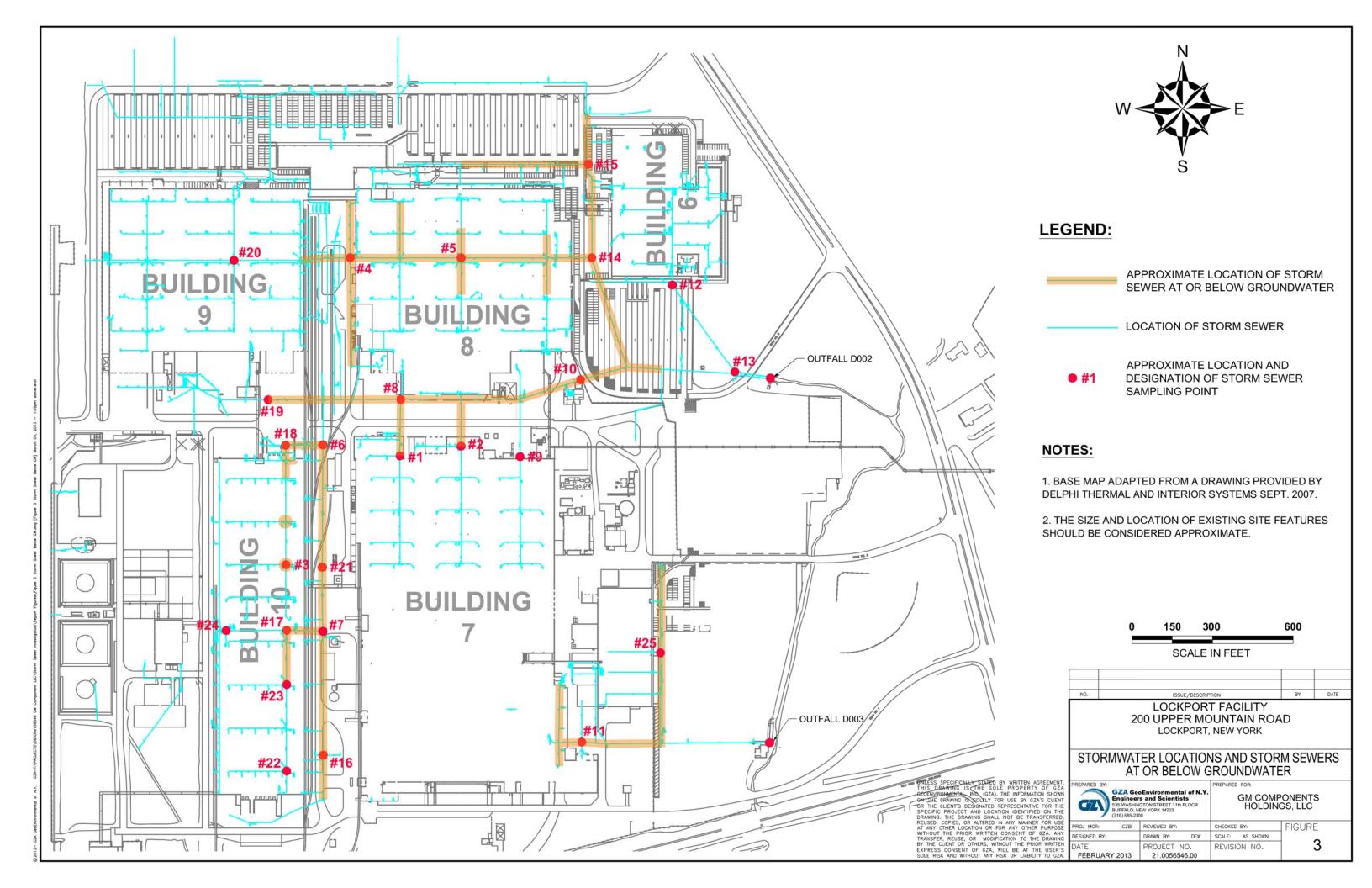
Roy Knapp (GMCH, electronic copy)

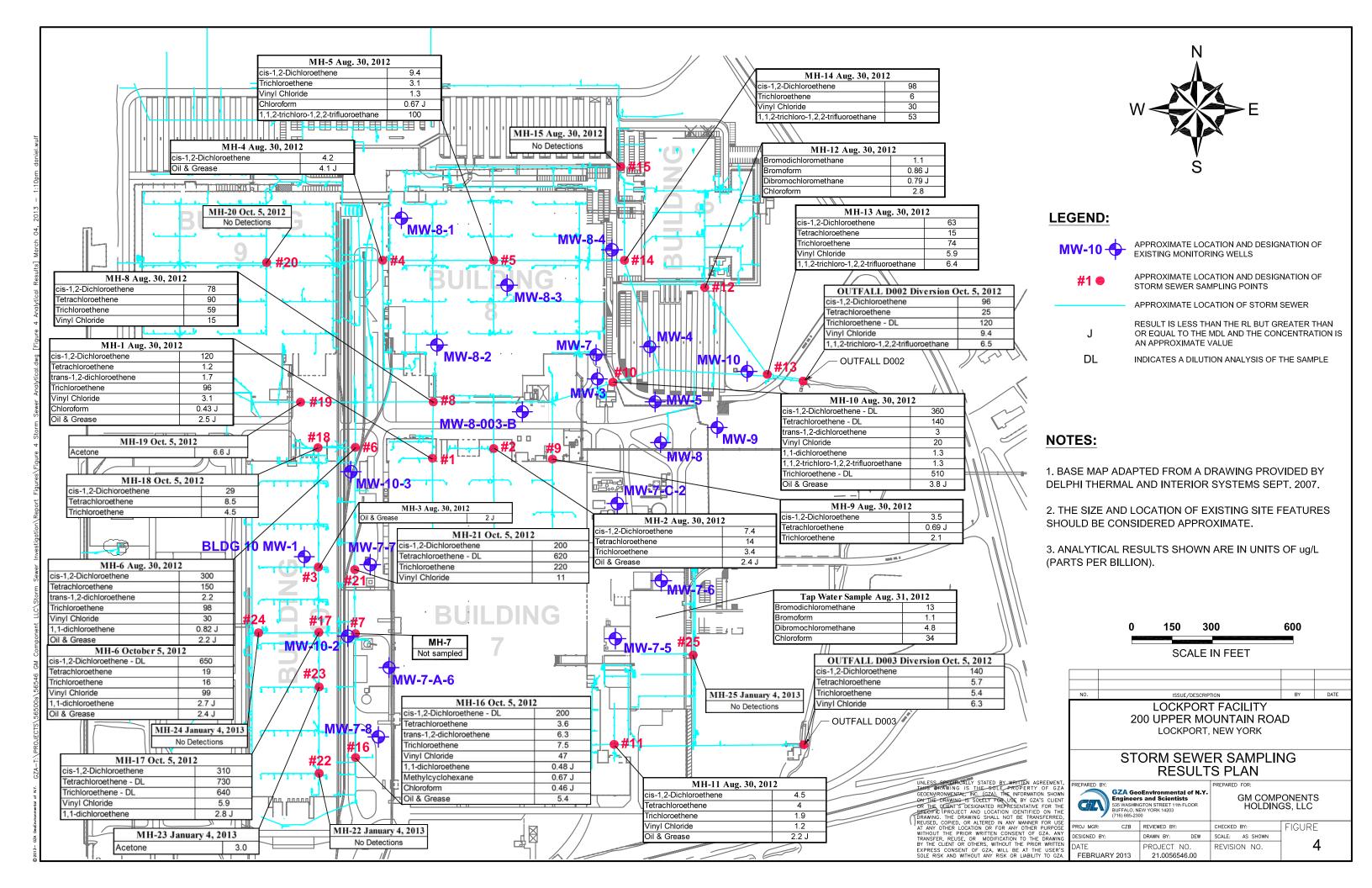
Hillie LaDue (GMCH, electronic copy)

Denis Conley (Haley & Aldrich, electronic copy)









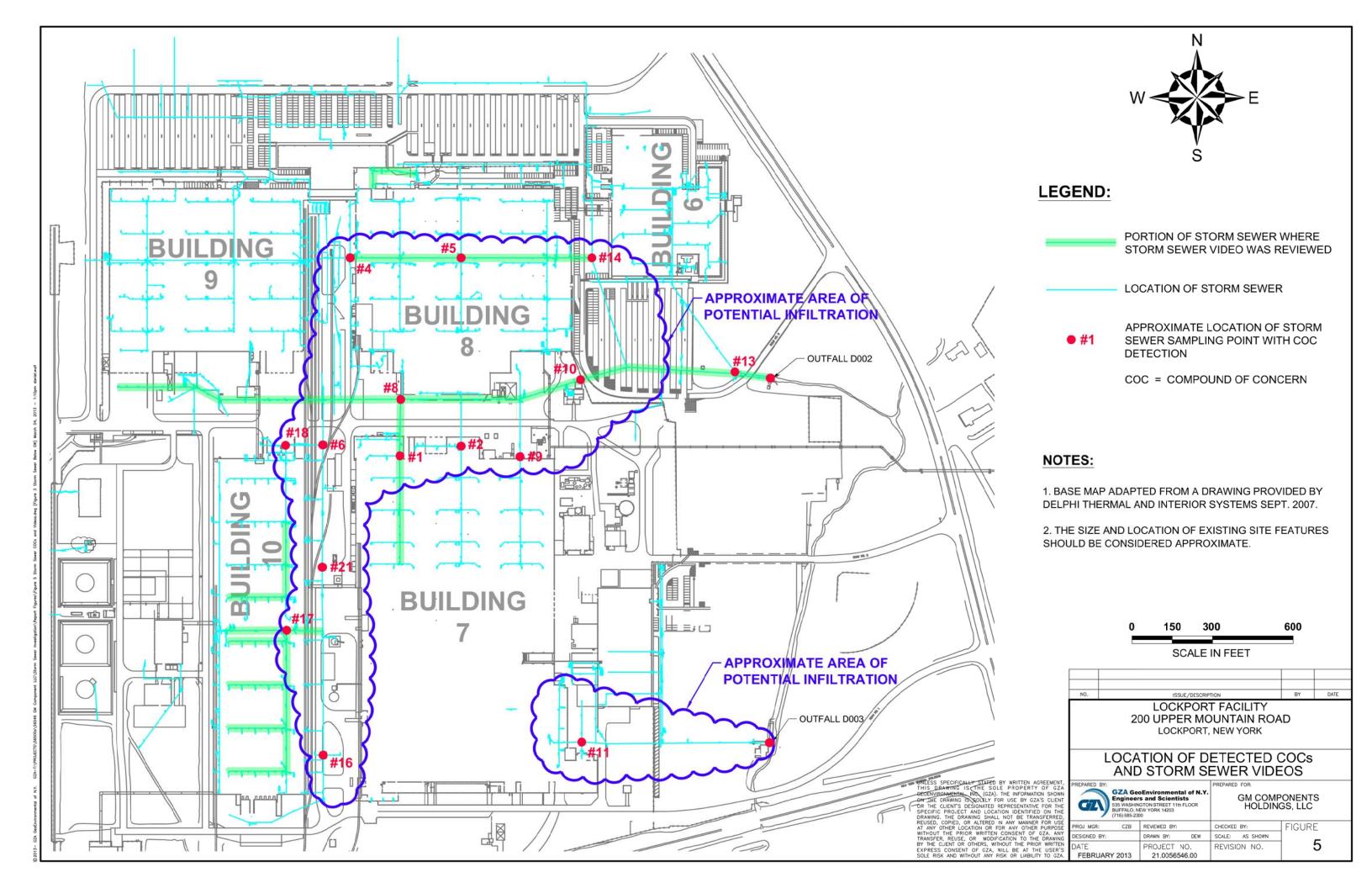


TABLE 1 Storm Sewer Sampling Summary GMCH Lockport

	Location	Flow	COC Detections	Sheen	OVM Readings	MH Construction	MH Bottom Elevation	Depth to Water	# of Pipes	Pipe Location	Pipe Invert Elevation	Nearby GW Elevation Range	Nearby Well Info Used	Groundwater Elevation Relative to Bottom of Manhole & Pipe Inverts	Notes/Comments																
							606.96	NM						At	Sample collected from water accumulated in bottom of MH. MH-1																
	Interior Bldg 7 Col			possible slight						South	609.95			Above	compounds of concern (COCs) concentrations (222 ppb) are greater than total COCs detected at MW-10-3 (35 ppb), which is upgradient																
MH-1	J63, NW corner	No	Yes	sheen	ND	Brick lined			3	West	609.96	606.99 to 607.38	MW-7-7, MW-10-3, MW-8-2	Above	of MH-1 by approximately 300 feet; and are well below COC concentrations detected at MW-7-A-6 and MW-7-7. North pipe																
										North	607.55			At	appears to be slip-lined.																
							606.96	609.96						At	Sample collected from discharge from southern pipe into MH. MH-2																
	Interior Bldg 7 Col	Slight flow from			0.2ppm above			South 609.95		MW-7-7, MW-10-3, MW-8-	Above	COC concentrations (25 ppb) are similar to those concentrations at MW-10-3 (35 ppb), which is upgradient of MH-2 by 550 feet, with similar compounds detected. MH-2 concentrations are well below																			
MH-2	V65, North central	south pipe	Yes	No	background (0.4 ppm)	Brick lined			3	West	607.46	605.73 to 607.38	2, MW-8-003B	At	concentrations detected at MW-7-A-6 and MW-7-7. PCE concentrations higher than those detected at MH-1, located west of																
										North	607.45	1		At	MH-2 about 220 feet upgradient by way of groundwater flow direction.																
							608.66	609.66						At																	
										South	611.35			Above																	
MH-3	Interior Bldg 10 Col WG43	No	No	No	ND	Brick lined			4	East	613.25	607.16 to 608.64	MW-10-1, MW-7-7, MW-10- 3	Above	Sample collected from water accumulated in bottom of MH. No																
	Col WG43									West	611.35		3	Above	COCs detected just oil & grease (2 ppm).																
										North	611.35	1		Above																	
		Yes, flow from					605.4	605.8						Below																	
		north upper								North Lower	606.6			Below	6 1 1 16 1 1 1 1 1 1																
MH-4	Exterior between	pipe, north lower pipe,	Yes	Yes	ND	Brick lined			6	North Upper South Lower	608.5 607.6	605.79 to 609.49	MW-8-1, MW-8-2,	Below Below	Sample collected from bottom of MH. Cis-DCE was the only COC detected, similar to groundwater results from MW-8-1, which is																
	Bldgs 8 & 9	south lower		163	NB	brick inicu	Brick lineu	Brick lineu	Brick iiileu	Brick iiiieu	Brick lilled	blick lilled	Brick inied	Brick inica	Brick iiileu	Brick linea	Blick lilled	blick lilled	Brick lifled		Brick iiricu	Brick inica				South Upper	609.8	- 003.73 to 003.13	MW-9-12	At	about 175 feet to the northeast from MH-4 and slightly upgradient.
		pipe and west						I		İ														West	605.4		Below				
		pipe.								East	605.4			Below																	
							603.36	603.66						Below																	
										West	604.46			Below	A water softener was discharging to the manhole via tubing through																
	Interior of Bldg 8									North	608.46			Below	a perforation in the top of the MH cover. Sample was collected from the water accumulating in the bottom of the MH. 1,1,2-																
MH-5	Col V101 (Cold	Yes	Yes	No	ND	Brick lined			6	South	606.46	606.31 to 609.49	MW-8-1, MW-8-2, MW- 8-3	Below	trichloro-1,2,2 trifluoroethane was detected at 100 ppb. Total COC																
	Storage)									Upper East	611.66			Above	concentrations at MH-5 are 14 ppb and the total COC concentration at MW-8-3 are 12 ppb, located about 100 feet to the southeast. No																
										Middle East	608.86			Above	vinyl chloride detected in MW-8-3.																
										Lower East	604.06			Below																	
							605.22	605.62						Below	MH cover (dome slotted steel) could not be removed. Sample was																
	Exterior near NW									South	605.8			Below	collected from water in bottom of the MH with a bailer. Total COC concentrations at MH-6 are 581 ppb and are greater than total COCs detected at MW-10-3 (35 ppb), which is located about 90 feet to the																
MH-6	corner of Bldg 10	No	Yes	No	ND	Brick lined			3	West	605.88	606.99 to 607.07	MW-7-7, MW-10-3	Below	south. MH-6 concentrations are well below concentrations detected at MW-10-1 and MW-7-7, but similar to MW-7-8 concentrations (417																
										North	605.77	=		Below	ppb), which is in the vicinity of the upgradient piping associated with MH-6.																
							5 feet bgs	4.9 feet bgs				No elevation data so		Below																	
	Futorior hatture	Flow from								South	5 feet bgs	GW assumed to be 2.3 to 3.9 feet bgs in	MANA/-10-2 MANA/ 7 0 MANA/ 7 A	Below	No complete district and a coldenia																
MH-7	Exterior between Bldg 7 & 10	south and west pipes in MH	NS	No	ND	ND Brick lined			3	West	5 ft bgs	on MW-7-A-6, MW-7-	MH-7 based MW-10-2, MW-7-8, MW-7.A-6, MW-7- A-6, MW-7- V-10-2 GW	Below	No sample collected, could not open or access MH. Observations and measurements made through MH cover.																
										North	4.4.7 ft bgs	8 and MW-10-2 GW measurements.		Below																	

Revised: 1/21/2013 Page 1 of 3

TABLE 1 Storm Sewer Sampling Summary GMCH Lockport

	Location	Flow	COC Detections	Sheen	OVM Readings	MH Construction	MH Bottom Elevation	Depth to Water	# of Pipes	Pipe Location	Pipe Invert Elevation	Nearby GW Elevation Range	Nearby Well Info Used	Pipe Relative to GW elevation and Bottom of Manhole	Notes/Comments	
							604.53	605.43						Below	Sample collected from water flowing though MH. Total COC	
MH-8	Exterior near SE	Flow from west to east through	Yes	No	ND	Brick lined			3	West	605.13	605.73 to 607.38	MW-8-2, MW-8-003B	Below	concentrations (242 ppb) are similar to MH-1 (222 ppb) which discharges to MH-8 from Bldg 7. Total COC concentrations in MW-8-	
	corner of Bldg 8	МН								South	605.13		,	Below	2 (approximately 210 feet north) is 10,604 ppb of which 10,000 ppb	
										East	605.13			Below	is the cis-DCE concentration. Pipe appears to be slip lined.	
	Exterior near NE				0.3 ppm above		607.94	608.84						Above	Sample collected from water accumulated in bottom of MH. Total COC concentrations decrease compared to MH-1 and MH-2 (also associated with Bldg 7), which are upgradient by way of groundwater	
MH-9	corner of Bldg 7	No	Yes	No	background (0 ppm)	Brick lined			2	South	609.95	602.11 to 605.73	MW-8-003B MW-8	Above	flow direction. Total COC concentration at MH-9 (6 ppb)is below the	
					(North	608.6			Above	total COCs detected at nearby wells MW-8-003-B (2,900 ppb) and MW-7-C-2 (392 ppb).	
							595.19	595.2	3				Below			
	Exterior near NE corner of Cooling	Flow from west	W		AUD.	0.11				West	595.19	505 05 1 505 00		Below	Sample collected from water flowing through MH. 1,1,2-trichloro- 1,2,2trifluoroethane was detected at 1.3 ppb. Total COC	
MH-10	Tower east of Bldg 8	to east through MH	Yes	Yes	ND	Brick lined				East	595.19	605.05 to 606.32	605.05 to 606.32 MW-3S, MW-7		concentration is 1,034 ppb, which is below the total COC concentrations at nearby wells MW-8-003-B (2,900 ppb) and MW-7	
										North/South	597.49	-		Below	(773,000 ppb). Solid ~1 ft diameter steel pipe through MH.	
							10.3 ft bgs	10.3 ft bgs				No elevation data so		Below		
										North	5.7 ft bgs	GW assumed to be 7	Above		 Sample collected from bottom of MH. Not able to fill 1L amber to very low flow. MH-11 Total COC concentrations (12 ppb) a 	
MH-11	Exterior near SE corner of Bldg 7	Very low flow	Yes	Slight sheen	n ND	Concrete lined			4	Southeast	4.5 ft bgs	to 10 feet bgs in vicinity of MH-11 based on MW-7-P-1 and MW-7-5 GW	MW-7-P-1, MW-7-5	Above	similar order of magnitude as the total COC concentration detects at MW-7-P-1 which was 19 ppb (vinyl chloride only, 2012 data) at 41 ppb (multiple COCs, 2011data). MW-7-P-1 is approximately 30	
COI	corner or Blug 7									East	10.3 ft bgs			Below		
										West	10.3 ft bgs	measurements.		Below	feet upgradient of MH-11.	
							5.6 ft bgs	4.6 ft bgs				No elevation data so GW assumed to be 6		Above		
MH-12	Exterior, south side of Bldg 6	Flow from north pipe	No	No	ND	Brick lined			2	North	4.7 ft bgs	to 12 feet bgs in vicinity of MH-12 based on MW-4 and	MW-4, MW-10	Above	Sample collected from flow from north pipe. No COCs detected outside Delphi Bldg 6.	
										Southeast	4.7 ft bgs	MW-10 GW measurements.		Above		
							9.0 feet bgs	8.3 feet bgs						Above		
							J	Ü		Northwest	7 ft bgs	No elevation data so GW assumed to be 12		Above	Sample collected from water accumulated in bottom of MH. 1,1,2- trichloro-1,2,2trifluoroethane was detected at 6.4 ppb. Total COC	
MH-13	Exterior near MW- 10 and Road 3	Yes	Yes	Yes	ND	Concrete lined			4	East North	9 ft bgs	feet bgs in vicinity of	MW-10		concentration at MH-13 are 158 ppb, which is below total COC concentration detected at MW-10 (562 ppb), which is 70 feet	
	10 and Road 3									East South	9 ft bgs	MH-12 based on MW- 10 GW		Above	upgradient of MH-13. MH-13 is part of a much larger structure than shown on sewer drawings previously provided and also receives	
												measurements.		Above	storm water from the line coming east from MH-10.	
										West	NM			Above		
							11.5 ft bgs	10.6 ft bgs				No elevation data so		Below	Sample collected from water accumulated in bottom of MH. 1,1,2- trichloro-1,2,2trifluoroethane was detected at 53 ppb. This is the	
MH-14	Exterior, near SW	Yes	Yes	Yes	ND	Brick lined			3	North	10.9	GW assumed to be 8 feet bgs in vicinity of	MW-8-4	Below	fourth detection of this compound and all four appear to be associated with lines under and around Bldg 8. Total COCs at MH-14	
(VIII-14	corner of Bldg 6	162	162	162	IND	DITCK IIIIEU			3	West	10.5	MH-14 based on MW- 8-4 GW	19199-0-4	Below	are 134 ppb and the total COC concentrations at MW-8-4, located approximately 50 feet to the northeast, are 88 ppb. The individual compounds detected at both MH-14 and MW-8-4 are the same, with	
										Southeast	10.7	measurements.		Below	similar concentration ratios detected.	
							606	606.4				Below				
МН 15	Exterior, near NW corner of Bldg 6, near former USTs	Yes	No	Vos	ND	Concrete lined			3	North	606.37	609.53	MW-6-F-8	Below	Sample collected from water accumulated in bottom of MH. No detections.	
WILL-TO		162	No	Yes	ND	Concrete lined			3	South	606.32	009.33	IVIVV-0-F-0	Below		
										West	607.32			Below		

Revised: 1/21/2013 Page 2 of 3

TABLE 1 **Storm Sewer Sampling Summary GMCH Lockport**

	Location	Flow	COC Detections	Sheen	OVM Readings	MH Construction	MH Bottom Elevation	Depth to Water	# of Pipes	Pipe Location	Pipe Invert Elevation	Nearby GW Elevation Range	Nearby Well Info Used	Pipe Relative to GW elevation and Bottom of Manhole	Notes/Comments		
	Futuria hatuur						NM	NM						Below	MH could not be opened. Sample was collected with bailer through		
NAU 46	Exterior between Bldgs 7 & 10 near	Yes, slight flow	V	NI-	ND	Daiol. line and				North	607.24	500.22	MM 7.0	Below	top of grate. Total COC at MH-16 is 258 ppb and the total COC		
MH-16	SE corner of Building 10	from south to north	Yes	No	ND	Brick lined			4	South	NM	609.22	MW-7-8	Below	concentrations at MW-7-8, located approximately 120 feet to the northeast, is 417 ppb. Cis-DCE was the main COC detected at both		
	Building 10									East	NM			unknown	MH-16 and MW-7-8, with similar concentrations detected.		
										West	NM			unknown			
							605.66	607.47						Below			
	Interior east									South	609.28			Above	Sample collected from water accumulated in bottom of MH. Total		
MH-17	central portion of	No	Yes	No	ND	Concrete lined			4	Upper West	NM	607.73	MW-10-2	Above	COC concentration at MH-17 is 1,689 ppb, which is below total COC concentration detected at MW-10-2 (3,326 ppb), located 100 feet		
	Bldg 10									Lower West	612.58	1		Above	east and downgradient of MH-17.		
										East	609.28			Above			
							5.71	5.58						Below	Sample collected from water accumulated in bottom of MH. Total		
	Located in the									South	606.35			Below	COC concentration at MH-18 is 42 ppb which is slightly above the		
MH-18	northern loading dock of Bldg 10	No	Yes	No	ND	Brick lined			3	East	606.35	607.16	MW-10-3	Below	total COC concentration detected at MW-10-3 (35 ppb), located 150 feet southeast and downgradient of MH-18. The same 3 COCs TCE,		
										West	608.45	1		Above	PCE and cis-DCE were detected at both locations.		
	Exterior location between Bulds 9 &						4.13	3.73						Below			
MH-19	10 along main storm sewer line	Yes, slight flow west to east	No	No	ND	Concrete lined			2	West	606.33	607.16	MW-10-3	Below	Sample collected from slight flow from west to east. No VOCs detected.		
	running west to east through Site									East	606.33			Below			
							607.24	608.03						Below			
MH-20	Interior central	Yes, slight flow from west to	No	No	No	No	ND	Brick lined			4	North South	609.59 609.46	~609	MW-9-101A and MW-8-1	At At	Sample collected from slight flow from west to east. Acetone was
14111 20	portion of Bldg 9	east	110	110	ND	Brick iiiled			,	East	608.64	003	WWW 5 TOTA UND WWW 6 T	At	the only VOC detected.		
										West	608.14			At			
	Exterior between	Yes, slight flow					NM	NM						Below	Bottom of MH consisted of the pipes entering and exiting the structure. Bottom of MH and water level were the same. Total COC		
MH-21	Bldgs 7 & 10, near MW-7-7	from south to north	Yes	No	ND	Brick lined			2	North	606.18	607.46	MW-7-7	Below	concentration at MH-21 is 1,051 ppb which is 3 orders of magnitude lower than the total COC concentration detected at MW-7-7		
										South	606.31			Below	(129,000 ppb), which is 60 feet east and downgradient of MH-21.		
							608.82	610.87			000.02			Below			
		Yes, slight flow frm South, SE								North	612.38			Above			
MH-22	Interior of Bldg 10 near Col WG5	and West and	No	No	ND	Brick lined			5	South West	613.33 612.63	Aprroximately 609	Contour Map Estimation	Above Above	Sample collected from water accumulated in bottom of MH. VOCs and O&G results were non-detect.		
	licar cor wes	flowing to the north								SE	613.31	- 003		Above	und odd results were non detect.		
		1101111								NW	NM			Above			
							607.51	608.58						Below			
		Yes, flow from								North	610.28	1		Above			
MH-23	Interior of Bldg 10	south and slight flow from west	No	No	ND	Brick lined			5	South West	610.53 612.63	Aprroximately	Coutour Map Estimation	Above Above	Sample collected from water accumulated in bottom of MH. COCs		
14111-23	near Col WG21	and exit to the	140	110	140	Driek iiileu				East	613.3	609	Coulous map Estimation	Above	and O&G results were non-detect. Acetone was detected at 3 ppb.		
		north								SE	NM	1		Above			
										NW	NM			Above			
	Interior of Bldg 10	Yes, slight flow					609.7	611.99		West	613.96	Annrovimately		Below	Sample collected from water accumulated in bottom of MH. VOCs		
MH-24	near Col WV31	in to MH from	No	No	ND	Brick lined			3	West South	613.96	Approximately 610	Contour Map Estimation	Above Above	and O&G results were non-detect.		
		south to east					6.0	6.24		East	613.7			Above			
NAU 25	Exterior, South of	Yes, slight flow	N/	N.	NS	Deiel Park	6.9	6.21	_	North	598.55	2000	Contain May 5 11 11	Below Below	Sample collected from water accumulated in bottom of MH. VOCs		
MH-25	Bldg 7A	from west to south	No	No	ND	Brick lined			3	South	599.55	~600	Contour Map Estimation	Below	and O&G results were non-detect.		
	1									West	600.77			At			

GZA interperted elevation or depth based on field measurements. bgs = below ground surface.

ND = non detect

NM = not measured

Revised: 1/21/2013 Page 3 of 3



2055 Niagara Falls Blvd., Suite #3 Niagara Falls, New York 14304

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MEMORANDUM

To:

Denis Conley

REF. NO.:

058507-256013

FROM:

Kathleen Willy/adh/54 \www.

DATE:

September 24, 2012

C.C.:

Claire Mondello, Chris Boron

E-Mail and Hard Copy If Requested

RE:

Data Quality Assessment and Verification

Storm Sewer Investigation General Motors Corporation

Lockport, New York

August 2012

The following details a quality assessment and validation of the analytical data resulting from the August 2012 collection of 15 samples from the General Motors Site in Lockport, New York. The sample summary detailing sample identification, sample location, quality control samples, and analytical parameters is presented in Table 1. Sample analysis was completed at TestAmerica Laboratories, Inc. (TestAmerica) in Amherst, New York in accordance with the methodologies presented in Table 2. Table 3 presents the validated analytical data.

The quality control criteria used to assess the data were established by the methods. Application of quality assurance criteria was consistent with the following guidance documents:

- i) "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review," EPA-540/R-99/008, October 1999
- ii) "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review," EPA-540/R-94/013, February 1994

These guidelines are collectively referred to as "NFGs" in this Memorandum.

The final sample results and supporting quality assurance/quality control (QA/QC) results were reported by the laboratory in a reduced deliverable format.

Data assessment was based on information obtained from blank data, surrogate recoveries, blank and matrix spike recoveries, and final data sheets.

Sample Quantitation

The laboratory reported detected concentrations of volatile organic compounds (VOCs) and oil and grease below the laboratory's practical quantitation limit (PQL) but above the laboratory's method detection limit



CRA MEMORANDUM

(MDL). The laboratory flagged these sample concentrations with a "J." These concentrations should be considered as estimated (J) values unless qualified otherwise in this memorandum.

Sample Preservation and Holding Times

Sample holding time periods and preservation requirements are summarized in the analytical methods. All sample extractions and/or analyses were performed within the specified holding times.

All samples were properly received and stored after collection.

Method Blank Samples

Method blank samples are prepared from a purified sample matrix and are processed concurrently with investigative samples to assess the presence and the magnitude of sample contamination introduced during sample analysis. Method blank samples are analyzed at a minimum frequency of one per analytical batch and target analytes should be non-detect.

The method blank samples were reported to be free from detectable levels of target analytes with the exception of a low level detection of bromomethane. All associated sample results were non-detect and no qualification of the data was necessary.

Surrogate Compounds - Organic Analyses

Individual sample performance for organic analyses was monitored by assessing the results of surrogate compound percent recoveries. Surrogate percent recoveries are reviewed against the laboratory developed control limits provided in the analytical report.

The surrogate recovery acceptance criteria were met for all samples indicating acceptable laboratory performance.

Matrix Spike/Matrix Spike Duplicate Analyses

To assess the long-term accuracy and precision of the analytical methods on various matrices, matrix spike/matrix spike duplicate (MS/MSD) percent recoveries and the relative percent difference (RPD) of the concentrations were determined. The organic MS/MSD percent recovery and RPD control limits are established by the laboratory.

MS/MSD analyses were analyzed at the proper frequency, and all recoveries were within laboratory specified control limits indicating good analytical accuracy and precision.

<u>Laboratory Control Sample (LCS)</u>

The LCS analysis serves as a monitor of the overall performance in all steps of the sample analysis and is analyzed with each sample batch. The LCS percent recoveries were evaluated against method and laboratory established control limits.

The LCS percent recoveries were all within the laboratory control limits indicating acceptable analytical accuracy.

CRA MEMORANDUM

Field QA/QC

Site-specific field QA/QC was not collected for this sampling event.

Overall Assessment

The data were found to exhibit acceptable levels of accuracy and precision based on the provided information and may be used without qualification.

TABLE 1

SAMPLE COLLECTION AND ANALYSIS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

				Analysis/P	arameters	
Sample ID	Location ID	Collection Date (mm/dd/yy)	Collection Time (hr:min)	TCL VOCs	Oil and Grease	Comments
MH-1-083012-0910	MH-1	8/30/2012	9:10	Χ	Χ	
MH-12-083012-1550	MH-12	8/30/2012	15:50	X	X	
MH-13-083012-1620	MH-13	8/30/2012	16:20	X	X	
MH-14-083012-1650	MH-14	8/30/2012	16:50	X	X	
MH-15-083012-1720	MH-15	8/30/2012	17:20	X	X	
MH-2-083012-1015	MH-2	8/30/2012	10:15	X	X	
MH-3-083012-1050	MH-3	8/30/2012	10:50	X	X	
MH-4-083012-1210	MH-4	8/30/2012	13:10	X	X	
MH-5-083012-1250	MH-5	8/30/2012	13:50	X	X	
MH-8-083012-1400	MH-8	8/30/2012	14:00	X	X	
MH-9-083012-1422	MH-9	8/30/2012	14:22	X	X	
MH-10-083012-1445	MH-10	8/30/2012	14:45	X	X	
MH-11-083012-1515	MH-11	8/30/2012	15:15	X	X	
TAP7A-083112-1345	Bathroom Tap 7A	8/31/2012	13:45	X		
MH-6-083112-1400	MH-6	8/31/2012	14:00	X	X	

Notes:

TCL Target Compound List.

VOCs Volatile Organic Compounds.

TABLE 2

SAMPLE HOLDING TIME CRITERIA AND ANALYTICAL METHODS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

Analytical Parameter Method

Volatile Organic Compounds SW 846 8260 $^{(1)}$ Oil and Grease $1664A^{(2)}$

Notes:

- Referenced from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," SW-846, Third Edition, 1986, with subsequent revisions.
- ² EPA-821-98-002

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

Sample Location: Sample ID: Sample Date:		Bathroom Tap 7A TAP7A-083112-1345 8/31/2012	MH-1 MH-1-083012-0910 8/30/2012	MH-2 MH-2-083012-1015 8/30/2012	MH-3 MH-3-083012-1050 8/30/2012	MH-4 MH-4-083012-1210 8/30/2012
Parameters	Units					
Volatile Organic Compounds						
1,1,1-Trichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromoethane (Ethylene dibromide)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Butanone (Methyl ethyl ketone) (MEK)	μg/L	10 U	10 U	10 U	10 U	10 U
2-Hexanone	μg/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	μg/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
Acetone	μg/L	10 U	10 U	10 U	10 U	10 U
Benzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromodichloromethane	μg/L	13	1.0 U	1.0 U	1.0 U	1.0 U
Bromoform	μg/L	1.1	1.0 U	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl bromide)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon disulfide	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon tetrachloride	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	μg/L	34	0.43 J	1.0 U	1.0 U	1.0 U
Chloromethane (Methyl chloride)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	μg/L	1.0 U	120	7.4	1.0 U	4.2
cis-1,3-Dichloropropene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Cyclohexane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Dibromochloromethane	μg/L	4.8	1.0 U	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Isopropyl benzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

Sample Location: Sample ID: Sample Date:		Bathroom Tap 7A TAP7A-083112-1345 8/31/2012	MH-1 MH-1-083012-0910 8/30/2012	MH-2 MH-2-083012-1015 8/30/2012	MH-3 MH-3-083012-1050 8/30/2012	MH-4 MH-4-083012-1210 8/30/2012
Parameters	Units					
Volatile Organic Compounds - Continued						
Methyl acetate	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl cyclohexane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Methylene chloride	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Styrene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Tetrachloroethene	μg/L	1.0 U	1.2	14	1.0 U	1.0 U
Toluene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,2-Dichloroethene	μg/L	1.0 U	1.7	1.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Trichloroethene	μg/L	1.0 U	96	3.4	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Trifluorotrichloroethane (Freon 113)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Vinyl chloride	μg/L	1.0 U	3.1	1.0 U	1.0 U	1.0 U
Xylenes (total)	μg/L	2.0 U	2.0 U	2.0 U	2.0 U	2.0 U
General Chemistry						
Oil and grease	mg/L	-	2.5 J	2.4 J	2.0 J	4.1 J

Notes:

J - Estimated concentration.

U - Not present at or above the associated value.

-- Not analyzed.

TABLE 3 Page 3 of 6

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

Sample Location: Sample ID:		<i>MH-5</i> <i>MH-5-083012-1250</i>	MH-6 MH-6-083112-1400	MH-8 MH-8-083012-1400	MH-9 MH-9-083012-1422	MH-10 MH-10-083012-1445
Sample Date:		8/30/2012	8/31/2012	8/30/2012	8/30/2012	8/30/2012
·	17 . 17					
Parameters	Units					
Volatile Organic Compounds						
1,1,1-Trichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	μg/L	1.0 U	0.82 J	1.0 U	1.0 U	1.3
1,2,4-Trichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromoethane (Ethylene dibromide)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
2-Butanone (Methyl ethyl ketone) (MEK)	μg/L	10 U	10 U	10 U	10 U	10 U
2-Hexanone	μg/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	μg/L	5.0 U	5.0 U	5.0 U	5.0 U	5.0 U
Acetone	μg/L	10 U	10 U	10 U	10 U	10 U
Benzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromodichloromethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromoform	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl bromide)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon disulfide	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Carbon tetrachloride	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	μg/L	0.67 J	1.0 U	1.0 U	1.0 U	1.0 U
Chloromethane (Methyl chloride)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	μg/L	9.4	300	78	3.5	360
cis-1,3-Dichloropropene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Cyclohexane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Dibromochloromethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
Isopropyl benzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U	1.0 U
	r6/ L	2.0 0	1.0 0	1.0 0	1.0 0	1.0 0

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

Sample Location: Sample ID: Sample Date:		MH-5 MH-5-083012-1250 8/30/2012	MH-6 MH-6-083112-1400 8/31/2012	MH-8 MH-8-083012-1400 8/30/2012	MH-9 MH-9-083012-1422 8/30/2012	MH-10 MH-10-083012-1445 8/30/2012
Parameters	Units					
Volatile Organic Compounds - Continued						
Methyl acetate	μg/L	1.0 U				
Methyl cyclohexane	μg/L	1.0 U				
Methyl tert butyl ether (MTBE)	μg/L	1.0 U				
Methylene chloride	μg/L	1.0 U				
Styrene	μg/L	1.0 U				
Tetrachloroethene	μg/L	1.0 U	150	90	0.69 J	140
Toluene	μg/L	1.0 U				
trans-1,2-Dichloroethene	μg/L	1.0 U	2.2	1.0 U	1.0 U	3.0
trans-1,3-Dichloropropene	μg/L	1.0 U				
Trichloroethene	μg/L	3.1	98	59	2.1	510
Trichlorofluoromethane (CFC-11)	μg/L	1.0 U				
Trifluorotrichloroethane (Freon 113)	μg/L	100	1.0 U	1.0 U	1.0 U	1.3
Vinyl chloride	μg/L	1.3	30	15	1.0 U	20
Xylenes (total)	μg/L	2.0 U				
General Chemistry						
Oil and grease	mg/L	5.6 U	2.2 J	4.9 U	5.3 U	3.8 J

Notes:

J - Estimated concentration.

U - Not present at or above the associated value.

- - Not analyzed.

TABLE 3 Page 5 of 6

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

Sample Location:		MH-11	MH-12	MH-13	MH-14	MH-15
Sample ID:		MH-11-083012-1515	MH-12-083012-1550	MH-13-083012-1620	MH-14-083012-1650	MH-15-083012-1720
Sample Date:		8/30/2012	8/30/2012	8/30/2012	8/30/2012	8/30/2012
Parameters	Units					
Volatile Organic Compounds						
1,1,1-Trichloroethane	μg/L	1.0 U				
1,1,2,2-Tetrachloroethane	μg/L	1.0 U				
1,1,2-Trichloroethane	μg/L	1.0 U				
1,1-Dichloroethane	μg/L	1.0 U				
1,1-Dichloroethene	μg/L	1.0 U				
1,2,4-Trichlorobenzene	μg/L	1.0 U				
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	1.0 U				
1,2-Dibromoethane (Ethylene dibromide)	μg/L	1.0 U				
1,2-Dichlorobenzene	μg/L	1.0 U				
1,2-Dichloroethane	μg/L	1.0 U				
1,2-Dichloropropane	μg/L	1.0 U				
1,3-Dichlorobenzene	μg/L	1.0 U				
1,4-Dichlorobenzene	μg/L	1.0 U				
2-Butanone (Methyl ethyl ketone) (MEK)	μg/L	10 U				
2-Hexanone	μg/L	5.0 U				
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBK)	μg/L	5.0 U				
Acetone	μg/L	10 U				
Benzene	μg/L	1.0 U				
Bromodichloromethane	μg/L	1.0 U	1.1	1.0 U	1.0 U	1.0 U
Bromoform	μg/L	1.0 U	0.86 J	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl bromide)	μg/L	1.0 U				
Carbon disulfide	μg/L	1.0 U				
Carbon tetrachloride	μg/L	1.0 U				
Chlorobenzene	μg/L	1.0 U				
Chloroethane	μg/L	1.0 U				
Chloroform (Trichloromethane)	μg/L	1.0 U	2.8	1.0 U	1.0 U	1.0 U
Chloromethane (Methyl chloride)	μg/L	1.0 U				
cis-1,2-Dichloroethene	μg/L	4.5	1.0 U	63	98	1.0 U
cis-1,3-Dichloropropene	μg/L	1.0 U				
Cyclohexane	μg/L	1.0 U				
Dibromochloromethane	μg/L	1.0 U	0.79 J	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	μg/L	1.0 U				
Ethylbenzene	μg/L	1.0 U				
Isopropyl benzene	μg/L	1.0 U				

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK AUGUST 2012

Sample Location: Sample ID: Sample Date:		MH-11 MH-11-083012-1515 8/30/2012	MH-12 MH-12-083012-1550 8/30/2012	MH-13 MH-13-083012-1620 8/30/2012	MH-14 MH-14-083012-1650 8/30/2012	MH-15 MH-15-083012-1720 8/30/2012
Parameters	Units					
Volatile Organic Compounds - Continued						
Methyl acetate	μg/L	1.0 U				
Methyl cyclohexane	μg/L	1.0 U				
Methyl tert butyl ether (MTBE)	μg/L	1.0 U				
Methylene chloride	μg/L	1.0 U				
Styrene	μg/L	1.0 U				
Tetrachloroethene	μg/L	4.0	1.0 U	15	1.0 U	1.0 U
Toluene	μg/L	1.0 U				
trans-1,2-Dichloroethene	μg/L	1.0 U				
trans-1,3-Dichloropropene	μg/L	1.0 U				
Trichloroethene	μg/L	1.9	1.0 U	74	6.0	1.0 U
Trichlorofluoromethane (CFC-11)	μg/L	1.0 U				
Trifluorotrichloroethane (Freon 113)	μg/L	1.0 U	1.0 U	6.4	53	1.0 U
Vinyl chloride	μg/L	1.2	1.0 U	5.9	30	1.0 U
Xylenes (total)	μg/L	2.0 U				
General Chemistry						
Oil and grease	mg/L	2.2 J	5.0 U	5.3 U	5.0 U	4.9 U

Notes:

J - Estimated concentration.

U - Not present at or above the associated value.

- - Not analyzed.



2055 Niagara Falls Blvd., Suite #3 Niagara Falls, New York 14304

Telephone: (716) 297-6150 Fax: (716) 297-2265

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MEMORANDUM

To:

Denis Conley

Ref. No.:

58507-256014

FROM:

Kathleen Willy/bjw/55 100

DATE:

October 29, 2012

CC:

Claire Mondello, Chris Boron

E-Mail and Hard Copy If Requested

RE:

Data Quality Assessment and Verification

Storm Sewer Investigation General Motors Corporation

Lockport, New York

October 2012

INTRODUCTION

The following details a quality assessment and validation of the analytical data resulting from the October 2012 collection of nine (9) samples and one (1) trip blank from the General Motors Site in Lockport, New York. The sample summary detailing sample identification, sample location, quality control samples, and analytical parameters is presented in Table 1. Sample analysis was completed at TestAmerica Laboratories, Inc. (TestAmerica) in Amherst, New York in accordance with the methodologies presented in Table 2. Table 3 presents the validated analytical data.

The quality control criteria used to assess the data were established by the methods. Application of quality assurance criteria was consistent with following guidance documents:

- "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review", EPA-540/R-99/008, October 1999;
- ii) "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review", EPA-540/R-94/013, February 1994.

These guidelines are collectively referred to as "NFGs" in this Memorandum.

The final sample results and supporting quality assurance/quality control (QA/QC) results were reported by the laboratory in a reduced deliverable format.

Data assessment was based on information obtained from blank data, surrogate recoveries, blank and matrix spike recoveries, and final data sheets.



CRA MEMORANDUM

SAMPLE QUANTITATION

The laboratory reported detected concentrations of volatile organic compounds (VOC) and oil and grease below the laboratory's practical quantitation limit (PQL) but above the laboratory's method detection limit (MDL). The laboratory flagged these sample concentrations with a "J". These concentrations should be considered as estimated (J) values unless qualified otherwise in this memorandum

SAMPLE PRESERVATION AND HOLDING TIMES

Sample holding time periods and preservation requirements are summarized in the analytical methods. All sample extractions and/or analyses were performed within the specified holding times.

All samples were properly received and stored after collection.

METHOD BLANK SAMPLES

Method blank samples are prepared from a purified sample matrix and are processed concurrently with investigative samples to assess the presence and the magnitude of sample contamination introduced during sample analysis. Method blank samples are analyzed at a minimum frequency of one per analytical batch and target analytes should be non-detect.

Method blanks were analyzed at the recommended frequency, and the results were non-detect for all analytes of interest.

SURROGATE COMPOUNDS - ORGANIC ANALYSES

Individual sample performance for organic analyses was monitored by assessing the results of surrogate compound percent recoveries. Surrogate percent recoveries are reviewed against the laboratory developed control limits provided in the analytical report.

The surrogate recovery acceptance criteria were met for all samples indicating acceptable laboratory performance.

MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD) ANALYSES

To assess the long term accuracy and precision of the analytical methods on various matrices, matrix spike/matrix spike duplicate (MS/MSD) percent recoveries and the relative percent difference (RPD) of the concentrations were determined. The organic MS/MSD percent recovery and RPD control limits are established by the laboratory.

MS/MSD analyses were analyzed at the proper frequency and all recoveries were within laboratory specified control limits indicating good analytical accuracy and precision.

CRA MEMORANDUM

LABORATORY CONTROL SAMPLE (LCS) ANALYSES

The LCS analysis serves as a monitor of the overall performance in all steps of the sample analysis and are analyzed with each sample batch. The LCS percent recoveries were evaluated against method and laboratory established control limits.

The LCS percent recoveries were all within the laboratory control limits indicating acceptable analytical accuracy.

FIELD QUALITY ASSURANCE/QUALITY CONTROL

Trip Blanks

Trip blanks are transported, stored, and analyzed with the investigative samples to identify potential cross-contamination of VOCs.

Trip blanks were collected and analyzed at the proper frequency and all results were non-detect for the compounds of interest.

OVERALL ASSESSMENT

The data were found to exhibit acceptable levels of accuracy and precision based on the provided information and may be used without qualification.

TABLE 1

SAMPLE COLLECTION AND ANALYSIS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

Analysis/Parameters

Sample ID	Location ID	Collection Date (mm/dd/yy)	Collection Time (hr:min)	TCL VOCs	Oil and Grease
MH-16-100512-1000	MH-16	10/05/12	10:00	X	Χ
MH-17-100512-1030	MH-17	10/05/12	10:30	X	Χ
MH-18-100512-1100	MH-18	10/05/12	11:00	X	Χ
MH-19-100512-1130	MH-19	10/05/12	11:30	X	X
MH-20-100512-1230	MH-20	10/05/12	12:30	X	X
MH-21-100512-1330	MH-21	10/05/12	13:30	X	X
MH-6-100512-1300	MH-6	10/05/12	13:00	X	Χ
OUTFALL002-100512-1400		10/05/12	14:00	X	X
OUTFALL003-100512-1430		10/05/12	14:30	X	X
TRIP BLANK	-	10/05/12	-	X	

Notes:

VOCs Volatile Organic Compounds

TABLE 2

SUMMARY OF ANALYTICAL METHODS STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

	Analytical
Parameter	Method
VOCs	SW 846 8260 ⁽¹⁾
Oil and Grease	$1664A^{(2)}$

Notes:

- Referenced from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, Third Edition, 1986, with subsequent revisions.
- ² EPA-821-98-002

VOCs Volatile Organic Compounds.

TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

	Sample Location: Sample ID: Sample Date:	MH-6 MH-6-100512-1300 10/5/2012	MH-16 MH-16-100512-1000 10/5/2012	MH-17 MH-17-100512-1030 10/5/2012	MH-18 MH-18-100512-1100 10/5/2012	MH-19 MH-19-100512-1130 10/5/2012
Parameters	Units					
Volatile Organic Compounds						
1,1,1-Trichloroethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,1-Dichloroethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,1-Dichloroethene	μg/L	2.7 J	0.48 J	2.8 J	1.0 U	1.0 U
1,2,4-Trichlorobenzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,2-Dibromoethane (Ethylene dibromide)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,2-Dichloroethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,2-Dichloropropane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
2-Butanone (Methyl ethyl ketone) (MEK)	μg/L	50 U	10 U	50 U	10 U	10 U
2-Hexanone	μg/L	25 U	5.0 U	25 U	5.0 U	5.0 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIE	BK) μg/L	25 U	5.0 U	25 U	5.0 U	5.0 U
Acetone	μg/L	50 U	10 U	50 U	10 U	6.6 J
Benzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Bromodichloromethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Bromoform	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Bromomethane (Methyl bromide)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Carbon disulfide	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Carbon tetrachloride	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Chlorobenzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U

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TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

	Sample Location: Sample ID: Sample Date:	MH-6 MH-6-100512-1300 10/5/2012	MH-16 MH-16-100512-1000 10/5/2012	MH-17 MH-17-100512-1030 10/5/2012	MH-18 MH-18-100512-1100 10/5/2012	MH-19 MH-19-100512-1130 10/5/2012
Parameters	Units					
Volatile Organic Compounds (Cont'd.)						
Chloroethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	μg/L	5.0 U	0.46 J	5.0 U	1.0 U	1.0 U
Chloromethane (Methyl chloride)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	μg/L	650	200	310	29	1.0 U
cis-1,3-Dichloropropene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Cyclohexane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Dibromochloromethane	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Ethylbenzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Isopropyl benzene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Methyl acetate	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Methyl cyclohexane	μg/L	5.0 U	0.67 J	5.0 U	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Methylene chloride	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Styrene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Tetrachloroethene	μg/L	19	3.6	730	8.5	1.0 U
Toluene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
trans-1,2-Dichloroethene	μg/L	5.0 U	6.3	5.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Trichloroethene	μg/L	16	7.5	640	4.5	1.0 U
Trichlorofluoromethane (CFC-11)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Trifluorotrichloroethane (Freon 113)	μg/L	5.0 U	1.0 U	5.0 U	1.0 U	1.0 U
Vinyl chloride	μg/L	99	47	5.9	1.0 U	1.0 U
Xylenes (total)	μg/L	10 U	2.0 U	10 U	2.0 U	2.0 U

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TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

		Sample Location:	MH-6	MH-16	MH-17	MH-18	MH-19
		Sample ID:	MH-6-100512-1300	MH-16-100512-1000	MH-17-100512-1030	MH-18-100512-1100	MH-19-100512-1130
		Sample Date:	10/5/2012	10/5/2012	10/5/2012	10/5/2012	10/5/2012
	Parameters	Units					
General Chemistry							
Oil and grease		mg/L	2.4 J	5.4	5.0 U	5.0 U	5.0 U

TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

8	Sample Location: Sample ID: Sample Date:	MH-20 MH-20-100512-1230 10/5/2012	MH-21 MH-21-100512-1330 10/5/2012	Outfall 002 OUTFALL002-100512-1400 10/5/2012	Outfall 003 OUTFALL003-100512-1430 10/5/2012
Parameters	Units				
Volatile Organic Compounds					
1,1,1-Trichloroethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,1,2,2-Tetrachloroethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,1,2-Trichloroethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,1-Dichloroethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,1-Dichloroethene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,2,4-Trichlorobenzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,2-Dibromoethane (Ethylene dibromide)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,2-Dichlorobenzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,2-Dichloroethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,2-Dichloropropane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,3-Dichlorobenzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
1,4-Dichlorobenzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
2-Butanone (Methyl ethyl ketone) (MEK)	μg/L	10 U	50 U	10 U	20 U
2-Hexanone	μg/L	5.0 U	25 U	5.0 U	10 U
4-Methyl-2-pentanone (Methyl isobutyl ketone) (MIBI	C) μg/L	5.0 U	25 U	5.0 U	10 U
Acetone	μg/L	10 U	50 U	10 U	20 U
Benzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Bromodichloromethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Bromoform	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Bromomethane (Methyl bromide)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Carbon disulfide	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Carbon tetrachloride	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Chlorobenzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U

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TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

	Sample Location: Sample ID: Sample Date:	MH-20 MH-20-100512-1230 10/5/2012	MH-21 MH-21-100512-1330 10/5/2012	Outfall 002 OUTFALL002-100512-1400 10/5/2012	Outfall 003 OUTFALL003-100512-1430 10/5/2012
Parameters	Units				
Volatile Organic Compounds (Cont'd.)					
Chloroethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Chloroform (Trichloromethane)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Chloromethane (Methyl chloride)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
cis-1,2-Dichloroethene	μg/L	1.0 U	200	96	140
cis-1,3-Dichloropropene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Cyclohexane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Dibromochloromethane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Dichlorodifluoromethane (CFC-12)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Ethylbenzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Isopropyl benzene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Methyl acetate	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Methyl cyclohexane	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Methyl tert butyl ether (MTBE)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Methylene chloride	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Styrene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Tetrachloroethene	μg/L	1.0 U	620	25	5.7
Toluene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
trans-1,2-Dichloroethene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
trans-1,3-Dichloropropene	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Trichloroethene	μg/L	1.0 U	220	120	5.4
Trichlorofluoromethane (CFC-11)	μg/L	1.0 U	5.0 U	1.0 U	2.0 U
Trifluorotrichloroethane (Freon 113)	μg/L	1.0 U	5.0 U	6.5	2.0 U
Vinyl chloride	μg/L	1.0 U	11	9.4	6.3
Xylenes (total)	μg/L	2.0 U	10 U	2.0 U	4.0 U

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TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK OCTOBER 2012

		Sample Location:	MH-20	MH-21	Outfall 002	Outfall 003
		Sample ID:	MH-20-100512-1230	MH-21-100512-1330	OUTFALL002-100512-1400	OUTFALL003-100512-1430
		Sample Date:	10/5/2012	10/5/2012	10/5/2012	10/5/2012
	Parameters	Units				
General Chemistry						
Oil and grease		mg/L	5.0 U	5.0 U	5.0 U	5.0 U

Notes:

- J Estimated concentration.
- U Not present at or above the associated value.



9033 Meridian Way, West Chester, Ohio 45069 Telephone: (513) 942-4750 Fax: (513) 942-8585

www.CRAworld.com

MEMORANDUM

To:

Denis Conley

REF. NO.:

58507-256014

FROM:

Kathleen Willy/eew/61

DATE:

January 23, 2013

CC:

Claire Mondello, Chris Boron

E-Mail and Hard Copy If Requested

RE:

Data Quality Assessment and Verification

Storm Sewer Investigation General Motors Corporation

Lockport, New York

January 2013

INTRODUCTION

The following details a quality assessment and validation of the analytical data resulting from the January 2013 collection of four (4) samples from the General Motors Site in Lockport, New York. The sample summary detailing sample identification, sample location, quality control samples, and analytical parameters is presented in Table 1. Sample analysis was completed at TestAmerica Laboratories, Inc. (TestAmerica) in Amherst, New York in accordance with the methodologies presented in Table 2. Table 3 presents the validated analytical data.

The quality control criteria used to assess the data were established by the methods. Application of quality assurance criteria was consistent with following guidance documents:

- (i) "USEPA Contract Laboratory Program National Functional Guidelines for Organic Data Review", EPA-540/R-99/008, October 1999
- (ii) "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review", EPA-540/R-94/013, February 1994.

These guidelines are collectively referred to as "NFGs" in this Memorandum.

The final sample results and supporting QA/QC results were reported by the laboratory in a reduced deliverable format.

Data assessment was based on information obtained from blank data, surrogate recoveries, blank and matrix spike recoveries, and final data sheets.



CRA MEMORANDUM

SAMPLE QUANTITATION

The laboratory reported detected concentrations of volatile organic compounds (VOC) and oil and grease below the laboratory's practical quantitation limit (PQL) but above the laboratory's method detection limit (MDL). The laboratory flagged these sample concentrations with a "J". These concentrations should be considered as estimated (J) values unless qualified otherwise in this memorandum

SAMPLE PRESERVATION AND HOLDING TIMES

Sample holding time periods and preservation requirements are summarized in the analytical methods. All sample extractions and/or analyses were performed within the specified holding times.

All samples were properly received and stored after collection.

METHOD BLANK SAMPLES

Method blank samples are prepared from a purified sample matrix and are processed concurrently with investigative samples to assess the presence and the magnitude of sample contamination introduced during sample analysis. Method blank samples are analyzed at a minimum frequency of one per analytical batch and target analytes should be non-detect.

Method blanks were analyzed at the recommended frequency, and the results were non-detect for all analytes of interest.

SURROGATE COMPOUNDS - ORGANIC ANALYSES

Individual sample performance for organic analyses was monitored by assessing the results of surrogate compound percent recoveries. Surrogate percent recoveries are reviewed against the laboratory developed control limits provided in the analytical report.

The surrogate recovery acceptance criteria were met for all samples indicating acceptable laboratory performance.

MATRIX SPIKE/MATRIX SPIKE DUPLICATE (MS/MSD) ANALYSES

To assess the long term accuracy and precision of the analytical methods on various matrices, matrix spike/matrix spike duplicate (MS/MSD) percent recoveries and the relative percent difference (RPD) of the concentrations were determined. The organic MS/MSD percent recovery and RPD control limits are established by the laboratory.

Site specific MS/MSD analyses were not performed.

CRA MEMORANDUM

LABORATORY CONTROL SAMPLE (LCS) ANALYSES

The LCS analysis serves as a monitor of the overall performance in all steps of the sample analysis and are analyzed with each sample batch. The LCS percent recoveries were evaluated against method and laboratory established control limits.

The LCS percent recoveries were all within the laboratory control limits indicating acceptable analytical accuracy.

FIELD QUALITY ASSURANCE/QUALITY CONTROL

Field QC was not collected for this sampling event.

OVERALL ASSESSMENT

The data were found to exhibit acceptable levels of accuracy and precision based on the provided information and may be used without qualification.

TABLE 1

SAMPLE COLLECTION AND ANALYSIS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK JANUARY 2013

Analysis/Parameters

Sample ID	Location ID	Collection Date (mm/dd/yy)	Collection Time (hr:min)	$TCL\ VOCs$	Oil and Grease	Comments
MH-24-010413-1110	MH-24	01/04/13	11:10	X	X	
MH-23-010413-1130	MH-23	01/04/13	11:30	X	X	
MH-22-010413-1145	MH-22	01/04/13	11:45	X	X	
MH-25-010413-1220	MH-25	01/04/13	12:20	X	X	

Notes:

VOCs Volatile Organic Compounds

TABLE 2

SUMMARY OF ANALYTICAL METHODS STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK JANUARY 2013

Oil and Grease

Parameter	Analytical Method		
VOCs	SW 846 8260 ⁽¹⁾		

 $1664A^{(2)}$

Notes:

- Referenced from "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, Third Edition, 1986, with subsequent revisions.
- ² EPA-821-98-002

VOCs Volatile Organic Compounds.

TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK JANUARY 2013

	Sample Location: Sample ID: Sample Date:	MH-22 MH-22-010413-1145 1/4/2013	MH-23 MH-23-010413-1130 1/4/2013	MH-24 MH-24-010413-1110 1/4/2013	MH-25 MH-25-010413-1220 1/4/2013
Parameters:	Units				
Volatile Organic Compounds					
1,1,1-Trichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2,2-Tetrachloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,1,2-Trichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,1-Dichloroethene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2,4-Trichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromo-3-chloropropane (DBCP)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dibromoethane (Ethylene dibromide)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,2-Dichloropropane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,3-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
1,4-Dichlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
2-Butanone (Methyl ethyl ketone) (MEK)	μg/L	10 U	10 U	10 U	10 U
2-Hexanone	μg/L	5.0 U	5.0 U	5.0 U	5.0 U
4-Methyl-2-pentanone (Methyl isobutyl keto	one) (MIBK) μg/L	5.0 U	5.0 U	5.0 U	5.0 U
Acetone	μg/L	10 U	3.0 J	10 U	10 U
Benzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Bromodichloromethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Bromoform	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Bromomethane (Methyl bromide)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Carbon disulfide	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Carbon tetrachloride	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Chlorobenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Chloroethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Chloroform (Trichloromethane)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U

TABLE 3

ANALYTICAL RESULTS SUMMARY STORM SEWER INVESTIGATION GENERAL MOTORS CORPORATION LOCKPORT, NEW YORK JANUARY 2013

	Sample Location:	MH-22	MH-23	MH-24	MH-25
	Sample ID:	MH-22-010413-1145	MH-23-010413-1130	MH-24-010413-1110	MH-25-010413-1220
	Sample Date:	1/4/2013	1/4/2013	1/4/2013	1/4/2013
Parameters:	Units				
Volatile Organic Compounds (continued)					
Chloromethane (Methyl chloride)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,2-Dichloroethene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
cis-1,3-Dichloropropene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Cyclohexane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Dibromochloromethane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Dichlorodifluoromethane (CFC-12)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Ethylbenzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Isopropyl benzene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Methyl acetate	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Methyl cyclohexane	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Methyl tert butyl ether (MTBE)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Methylene chloride	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Styrene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Tetrachloroethene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Toluene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,2-Dichloroethene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
trans-1,3-Dichloropropene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Trichloroethene	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Trichlorofluoromethane (CFC-11)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Trifluorotrichloroethane (Freon 113)	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Vinyl chloride	μg/L	1.0 U	1.0 U	1.0 U	1.0 U
Xylenes (total)	μg/L	2.0 U	2.0 U	2.0 U	2.0 U
General Chemistry					
Oil and grease	mg/L	5.0 U	5.0 U	5.0 U	5.0 U

Notes:

J - Estimated concentration.

U - Not present at or above the associated value.