

**GM COMPONENTS HOLDINGS, LLC
200 UPPER MOUNTAIN ROAD
LOCKPORT, NEW YORK
BUILDING 8 SITE #932140
REMEDIAL INVESTIGATION WORK
PLAN**

PREPARED FOR:

New York State Department of Environmental Conservation

PREPARED BY:

GZA GeoEnvironmental of New York
Buffalo, New York

June 2010

File No. 21.0056546.00

**GM COMPONENTS HOLDINGS, LLC
LOCKPORT, NEW YORK
BUILDING 8 SITE ID #C932139
BROWNFIELD CLEANUP PROGRAM
REMEDIAL INVESTIGATION WORK PLAN
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1.0 INTRODUCTION

1.1 PURPOSE

The purpose of this Remedial Investigation Work Plan (RIWP) is to describe activities planned for the implementation of the Remedial Investigation (RI) associated with Building 8 (Site ID # C932139) at the GM Components Holdings, LLC (GMCH) Lockport Facility, located at 200 Upper Mountain Road, in the City of Lockport, New York (see Figure 1).

The work described in this RIWP is being done under a New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program (BCP) Agreement. GZA GeoEnvironmental of New York (GZA) will be responsible for completing the RI for Building 8.

It should be noted that there are three separate BCP Sites associated with the GMCH Lockport Facility, as follows.

- GM Components Holdings, LLC Building 7, site ID #C932138 (Building 7)
- GM Components Holdings, LLC Building 8, site ID #C932139 (Building 8)
- GM Components Holdings, LLC Building 10, site ID #C932140 (Building 10)

This RIWP has been developed for the work associated with Building 8. Separate RIWPs have been developed for the work associated with Building 7 and Building 10.

1.2 PROPERTY DESCRIPTION

The GMCH facility is located at 200 Upper Mountain Road in both the City and Town of Lockport, which is located in Niagara County, New York. The portion of the facility which includes Building 10 is located within the City of Lockport.

The GMCH facility is approximately 342 acres in size and located in an area of mixed residential, agricultural, commercial, and industrial settings along Upper Mountain Road. Building 8 constitutes approximately 13 of the 342 acres and is located in the northern central portion of the GMCH facility. Across Upper Mountain Road, the Niagara Escarpment is located approximately one-half mile to the northeast. A stone quarry and former steel facility are located approximately 1 mile south of GMCH. Residential properties are generally present along the east and north sides of Upper Mountain Road and to the west.

Within the facility, Building 7, Building 8, and Building 9 are dedicated to manufacturing and engineering. Building 10 has been converted to house new manufacturing operations staffed by non-GMCH personnel in the northern portion with the southern portion being used by GMCH as a warehouse. Building 6 has been leased to Delphi Properties Management, LLC for vehicle component engineering and testing (see Figure 2).

1.3 BACKGROUND

GMCH currently owns and operates an automotive component manufacturing facility along Upper Mountain Road in the City and Town of Lockport, New York. The facility was initially developed in 1937 on vacant agricultural land and orchards. The Site was developed as part of the radiator manufacturing operation, formerly located in downtown Lockport. Manufacturing operations began at the facility along Upper Mountain Road in 1939.

General Motors Corporation owned and operated the facility until it was conveyed to Delphi Automotive Systems, LLC (Delphi) in December 1998. In June 2009, General Motors Corporation filed for Chapter 11 bankruptcy protection and it is now known as Motors Liquidation Company (MLC).

A new company was created to purchase certain assets of MLC and the current name of that entity is General Motors LLC (GM). A GM subsidiary, known as GMCH, took title from Delphi the portion of the facility that includes Building 8 in October 2009.

Building 8 was constructed in phases between 1960 and 1966 and was utilized for manufacturing since its construction. The northern portion of the building is being used for storage of product and unused equipment and manufacturing is still on-going in the southern portion.

In 2006, a voluntary facility-wide investigation of soil and groundwater conditions at the facility was conducted. The first phase of that work was the development of a Current Conditions Summary (CCS) which was completed by Environmental Resource Management (ERM). The CCS work generally followed the requirements for a CCS in the RCRA Corrective Action Program and we believe it was comprehensive, comparable to an initial BCP or State Superfund investigation.

After completion of the CCS, a field investigation, also completed by ERM, was initiated to assess soil and groundwater conditions at the 50 areas of interest (AOI), identified by the CCS. A total of 144 soil borings were completed, nine sediment and four surface soil samples were collected. Six monitoring wells were installed, but only five were sampled as one of the wells was dry. Over 400 soil and groundwater samples were collected from the 144 soil borings and analyzed for an extensive list of parameters, which included volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals and polychlorinated biphenyls (PCBs). The field investigation activities and results were described in the Field Investigation Report (FIR) that was submitted to the NYSDEC Region 9 office in January 2007, followed by the CCS submission in May 2007.

Three (3) AOIs located within the footprint of the Building 8 BCP site were investigated as part of the field investigation. Thirty-two (32) soil probes were completed to assess the AOIs (see Figure 3). At each AOI, samples were analyzed for VOCs, SVOCs, PCBs, and metals. These AOIs are shown on Figure 3 and are as follows.

- AOI-18 was a former chromium sump area in the central portion of the building.
- AOI-22 was six (6) former degreasing locations located throughout the building.
- AOI-23 was a historic press operations area in the northeastern portion of the building.

The investigation identified elevated levels of chlorinated solvents in soils beneath one former degreaser area (AOI-22) in the southeastern interior of Building 8, as well as chlorinated solvents in groundwater south of the building. Arsenic and benzo(a)pyrene were also detected at elevated levels at AOI-18 and AOI-23, respectively.

Boring 8-001-G was one of nine borings completed within AOI-18. Results of the soil samples from 8-001-G indicated that arsenic was detected at a concentration of 65.8 parts per million (ppm) in a sample collected from 2 to 4 feet below the building slab. This detection of arsenic is above its NYSDEC Part 375 Industrial Soil Cleanup Objective (ISCO) of 16 ppm. No other compounds were detected above their respective Industrial SCO in the samples collected to address AOI-18. This detection is not considered to be significant as arsenic is not mobile in soil, its detection was limited to one location at a depth of 2 to 4 feet, which is above the groundwater table in this area of the site.

Boring 8-006-F was one of seven borings completed to address AOI-23. Benzo(a)pyrene was detected at a concentration of 1.4 ppm in a sample collected from 8-006-F; 0 to 1.5 feet below the building slab. This detection of benzo(a)pyrene is above its NYSDEC Part 375 ISCO of 1.1 ppm. This detection is not considered to be significant as SVOCs are not mobile in soil, its detection was limited to one location at a depth of 0 to 1.5 feet, which is above the groundwater table in this area of the site. No other compounds were detected above their respective Industrial SCO in the samples collected to address AOI-23.

Boring 8-005-3C was one of 16 borings completed to address AOI-22, the six (6) former degreaser locations. Trichloroethene (TCE) was detected at a concentration of 1,000 ppm in a sample collected from 8-005-3C; 8 to 10 feet below the building slab. This detection of TCE is above its NYSDEC Part 375 Industrial Soil Cleanup Objective of 400 ppm. No other compounds were detected above their respective Industrial SCO in the samples collected to address AOI-22. VOCs will be the focus of additional investigations discussed later in this RIWP.

1.4 INVESTIGATION OBJECTIVES

The objectives of this RI is to obtain Site specific data on the nature and extent of potential soil and groundwater contamination and the degree to which the potential contamination poses a threat to human health and the environment. On March 18, 2010 GMCH met with NYSDEC to discuss the three BCP sites; NYSDEC acknowledged that VOCs would be the focus of the investigation based on the previous investigation conducted in Building 8.

Proposed soil borings, soil probes, indoor air and subslab sample locations, and bedrock monitoring wells related to the Building 8 RI are shown on Figure 4. As there are also RIs occurring related to the Buildings 7 and 10 BCP Sites, the number of explorations associated with Building 8 is limited to the Building 8 BCP Site footprint and

downgradient (east) between Building 8 and Building 6 (see Figure 4). It should be noted that the RIs for the three BCP Sites at the Lockport facility will be conducted concurrently. Consequently, although the focus of the BCP Agreement for Bldg 8 is on an evaluation of environmental conditions at the site known as Bldg 8 (with an approximate acreage of 13.1 acres - see paragraph II of the BCP Agreement), the data generated from the neighboring BCP sites and from other facility-wide investigations that are being conducted (for example, 18 existing monitoring wells will be sampled in 2010 as part of other on-going monitoring and/or investigations (see Figure 4)) will be considered as part of that investigation.

This RI will involve test borings, monitoring well installation, soil probes, vapor intrusion assessment and analytical sample collection.

The specific objectives of the RI are as follows:

- Further assess Site geology;
- Further assess hydrogeology;
- Evaluate extent of contamination;
- Evaluate transport mechanisms;
- Assess the potential source(s) of contamination and assess impact to soil and groundwater; and
- Identify potential pathways for human exposure as part of a qualitative risk assessment.

2.0 DESCRIPTION OF FIELD ACTIVITIES

The field activities described below are intended to accomplish the objectives of the RI.

2.1 GENERAL FIELD ACTIVITIES

General field activities include site meetings, mobilization, implementing the health and safety plan, test borings, sampling and analytical testing, decontamination and handling of investigation wastes, and surveying. Subcontractors will be used for drilling, analytical testing and surveying.

2.1.1 Site Meeting

A Site “kick-off” meeting will be held with GMCH, GZA and the drilling subcontractor(s) prior to initiating field work activities. The purpose of the meeting will be to orient field team members, GMCH staff and subcontractors with the Site, project personnel, Site background, scope of work, potential dangers, health and safety requirements, GMCH site-specific security and safety protocols, emergency contingencies and other field procedures. NYSDEC staff are welcome to attend and will be notified at least seven (7) days in advance of the meeting.

2.1.2 Mobilization

Following approval of the RI Work Plan by NYSDEC, the Underground Facilities Protection Organization (UFPO) will be contacted at 1-800-962-7962 to clear exploration locations. Utility clearance will require three working days by UFPO. Additionally, an Excavation Permit (Environmental Management System Work Instruction 014) will need to be obtained from GMCH Plant Engineering. This will require that exploration locations be approved by GMCH Plant Engineering prior to starting the investigation. GZA and its subcontractors then will mobilize necessary materials and equipment to the Site.

2.1.3 Health and Safety

It is anticipated that the work to be completed at the Site will be done at level D personal protection. Should health and safety monitoring during field activities indicate a threat to field personnel or warrant an upgrade to level C protection, work will stop, Site conditions will be re-evaluated prior to further investigation activities. See Section 5.0 for additional information on Health and Safety.

2.1.4 Decontamination and Handling of Investigation Derived Waste

Decontamination procedures for the field activities are described in the Equipment Decontamination Field Method Guideline (FMG) included in Appendix A. Personal protective equipment (i.e., latex gloves) and disposable sampling equipment (i.e., polyethylene tubing) will be placed in plastic garbage bags for disposal as a solid waste at the Site.

Excess soil cuttings from test borings and/or soil probes will be drummed and stored on-Site for future disposal. Soil will be characterized for proper disposal at a landfill facility permitted to accept the soil cuttings based on the waste characterization results (i.e., non-hazardous or hazardous). Waste characterization sample analysis will be based on the sampling requirements of the disposal facility selected.

Purge water and well development water will be containerized in 55-gallon drums and stored until analytical results are received. If analytical results are within permissible acceptable limits for discharge to the City of Lockport wastewater treatment facility and authorization is received to do so, drummed water will be discharged to the sanitary sewer. If analytical results do not permit discharge to the sanitary sewer, drummed water will be sampled and characterized for proper disposal. Waste characterization sample analysis will be based on the sampling requirements of the disposal facility selected.

The quantities and volumes of investigation derived waste (IDW) to be generated are unknown and will be managed in accordance with the Waste Characterization Field Method Guide (FMG) in Appendix A.

2.1.5 Survey

Following completion of the RI investigation, a professional land surveying firm (McIntosh & McIntosh, P.C.) will be subcontracted to locate exploration locations and prepare a Site base map.

2.2 RI FIELD INVESTIGATIONS

RI field work will generally be done in compliance with NYSDEC's Draft DER-10 "Technical Guidance for Site Investigation and Remediation", dated June 2010. On March 18, 2010 GMCH met with NYSDEC to discuss the three BCP sites. NYSDEC acknowledged that VOCs would be the focus of the investigation based on the previous investigation conducted in Building 8.

2.2.1 Vapor Intrusion Assessment

A product inventory is typically required prior to conducting a vapor intrusion assessment. GMCH maintains a database of chemicals and chemical products stored and used within Building 8. A copy of the database will be provided for review prior to completing the air sampling. The purpose of the product inventory review will be to determine if compounds of concern (PCE, TCE, cis-DCE, trans DCE and VC) are present within products and chemicals currently used within Building 8 that have the potential to create interference or bias in the air sampling results. Prior to initiating the air sampling, GZA will review the product inventory list to determine if chemicals or products need to be removed from the sampling area at least 24 hours prior to the sampling event.

During the air sampling event, GZA will make observations of the chemicals and chemical products in the areas of the sampling to determine the completeness of the database provided by GMCH. Additionally, a photoionization detector (PID), which can screen levels down to the part per billion (ppb) range, will be used to screen individual containers observed and determine background levels within the sampling areas.

Three types of air samples (sub-slab, ambient indoor, and ambient outdoor) will be collected as part of the vapor intrusion assessment. The samples will be collected via methodologies identified in the New York State Department of Health, "Guidance for Evaluating Soil Vapor Intrusion in the State of New York", dated October 2006 (NYSDOH Document).

Five (5) indoor air sample locations are proposed within Building 8 (see Figure 5). The indoor air samples will be collected from the breathing zone or approximately 4 to 5 feet above the slab-on-grade floor.

Five (5) sub-slab air samples are proposed within Building 8. The sub-slab samples will be collected from under the slab-on-grade floor through an approximate 1/2-inch diameter hole drilled in a competent portion of the concrete floor away from cracks or drains. Clean, dedicated polyethylene tubing will be placed into the hole to a depth approximately 2-inches below the concrete slab and sealed at the floor surface with

modeling clay. The sub-slab air samples will be collected from within 10 feet of the indoor air sample locations (see Figure 5 for approximate locations).

One ambient outdoor air sample will be collected from an exterior upwind location of Building 8. The outdoor air sample will be collected from approximately 4 to 5 feet above the ground surface on the day of the indoor air sampling event.

The air sampling will be completed using dedicated, laboratory-supplied flow regulators and sample canisters for an eight-hour duration (e.g., standard shift duration in a commercial/industrial facility) in accordance with NYSDOH Document. Air samples will be collected using a one-liter sampling canisters and will be analyzed via USEPA Method TO-15 for the volatile organic compounds (VOCs).

2.2.2 Test Boring, Monitoring Well Installation and Sampling

Four (4) permanent monitoring wells will be installed as part of the Building 8 RI, three (3) inside of the building and one (1) downgradient of Building 8 (see Figure 5). Based on previous work done at the GMCH property in this area, bedrock is at a depth of approximately 7 feet below ground surface (bgs). Groundwater at the Site is typically present in the vicinity of the overburden soil and bedrock interface.

Test borings for monitoring well installation will be advanced in the overburden soils using a track or truck mounted rotary drill rig using 6 1/4 inch inside diameter hollow stem augers (HSA). Overburden soil samples will be obtained by driving a 1 3/8 inch inside diameter by 24 inch long split spoon sampler 24 inches ahead of the lead cutting shoe of the HAS. The test borings will be completed as outlined in the Soil Boring FMG in Appendix A.

Soil samples collected from the test borings will be classified in the field by visual examination in accordance with the Soil Classification FMG in Appendix A. Boring logs that identify appropriate stratification lines, blow counts (if applicable), sample identification, sample depth interval and recovery, and date will be generated for each test boring and included as an appendix to the RI report.

The HSAs will be advanced until refusal is encountered. Drilling fluids will not be used while advancing the HSA in the overburden, so groundwater can be identified, if encountered. Once bedrock is encountered, the upper 2 feet of bedrock will be drilled using a 5 7/8 inch roller bit to set a 4 inch diameter steel casing. The steel casing will be installed, grouted into place and allowed to set up for at least 12 hours before drilling activities continue at the respective location. Once the grout around the casing has set up, a 3 7/8 inch diameter rock core barrel will be used to complete the boring to the designated depth, assumed to be approximately 15 feet bgs.

The rock core samples will be logged including run number, sample interval, length of sample recovered, rock quality designation (RQD), depth where drill water was lost, and a description of the rock mass and individual discontinuities (bedding planes, joints, voids, etc.). This information will be included on the boring logs. Rock core samples will be

placed in wooden core boxes, photographed and labeled with the project name and number, boring number, run number, depth interval of the run and date. The rock core boxes shall be stored by GMCH for 1 year. The bedrock coring will be completed as outlined in the Bedrock Coring and Rock Classification FMGs in Appendix A.

After the designated depth has been reached, the completed test boring will be converted to a groundwater monitoring well. The well will be constructed of 2 inch inner diameter flush coupled PVC riser and screen. The screen will consist of an approximate 5 to 7 foot long section of machine slotted PVC. A sand filter will be placed in the boring around the annulus space of the well screen such that the sand extends a minimum of 1-foot above the top of the screen. An approximate 3-foot thick layer of bentonite will be placed above the sand filter to provide a seal from the overburden conditions above the screen. A mixture of cement/bentonite grout will extend from the bentonite seal to approximately 1-foot bgs. The monitoring well will be completed by placing a flush mounted road box over the riser. Concrete will be placed in the boring around the protective casing and sloped away from the casing. The monitoring wells will be installed as outlined in the Well Construction Materials and Deep Bedrock Wells FMG in Appendix A.

The soil cuttings generated from the test boring will be placed in 55-gallon drums for disposal by GMCH. The drums will be labeled with date and location and staged in a secure area at the Site approved by GMCH. GZA assumes the soil spoils generated from the test borings will not be contaminated. Procedures discussed in Section 2.1.4 will be utilized to determine the handling of the soil cuttings.

The test borings will be observed by a field engineer/geologist and a field log for each boring/monitoring well will be created. Real time air monitoring will be conducted while test borings are being completed using an OVM. Soil samples will be collected at two-foot intervals to the bottom of the boring for classification, laboratory analysis and screening with the OVM. Soil samples collected for analytical testing will typically be collected from contaminated soils or material, based on visual, olfactory, field screening (OVM) and engineering judgment that warrant further assessment. One soil sample will be collected for VOC analysis from each test boring. The soil sampling will be conducted utilizing the Soil Sampling FMG in Appendix A.

The monitoring wells will be developed to remove the fines and develop the sand filter pack utilizing the Well Development FMG in Appendix A. Hydraulic conductivity testing will be performed to assess whether the monitoring well is functioning and provide hydrologic information in accordance with the In Situ Hydraulic Conductivity (Slug Test) Procedure FMG in Appendix A. Water level measurements will be collected to interpret groundwater flow direction as outline in the Water Level Measurements FMG in Appendix A.

Groundwater samples will be collected from the four (4) newly installed monitoring wells and four (4) existing wells (MW-6-F-8, MW-8-003-B, MW-6-1 and MW-6-2). Groundwater sampling will be conducted utilizing low-flow sampling techniques as outlined in the Groundwater Sampling FMG in Appendix A. A water quality

meter, disposable polyethylene tubing and a variable speed peristaltic pump will be utilized during the monitoring and sampling.

Water generated during development and purging prior to sampling will be containerized until the analytical results of the groundwater samples are received. IDW will be managed as described in Section 2.1.4.

2.2.3 Soil Probes

GZA is proposing to complete six (6) soil probes in the southeastern portion of the Building 8 (see Figure 5). These soil probes will be completed to delineate the extent of TCE contamination identified a soil boring 8-00503C. TCE was detected at 1,000 ppm in a soil sample from 8 to 10 feet bgs at this location. The six (6) soil probes will be complete approximately 15 feet away from this previous location (see Figure 3) to determine the potential extent of the TCE contamination present in the subsurface soil.

The soil probes will be advanced into overburden soils utilizing direct push technology via a hydraulic hammer mounted on a truck or track mounted rig equipped with a 2-inch outer diameter by 48-inch long macrocore sampler. Soil probes will be advanced to refusal, which is anticipated to be about 8 to 10 feet below the building slab based on previous investigations in the northeastern portion of the building.

A field engineer/geologist will observe the soil probes and create a field log for each probe. Real time air monitoring will be conducted while soil probes are being completed using an OVM. Soil samples will be collected from the soil probes for classification, laboratory analysis, and screening with the OVM. Soil samples will be collected at two foot intervals to the bottom of the probes. Samples collected for analytical testing will typically be collected from contaminated soils or material, based on visual, olfactory, field screening and engineering judgment that warrant further analysis. If total organic vapors are not detected above 1 part per million (ppm) during the field screening at a probe location, no soil sample will submitted for VOC analysis. The soil probe investigation will be completed in accordance with the Drilling Techniques and Soil Boring FMGs included in Appendix A.

2.2.4 Fish and Wildlife Resources Impact Analysis

A fish and wildlife impact analysis that characterizes resources used to identify potential or actual impacts will be performed for the Site (Part 1 assessment – see NYSDEC Draft DER-10). If no fish or wildlife resources or ecological exposure pathways are identified, then this component of the work will be considered complete. If there is a potential for fish and wildlife impacts, then a plan will be developed to implement a preliminary ecological impact assessment (Part 2).

2.3 ENVIRONMENTAL ANALYTICAL TESTING PROGRAM

The environmental testing program is summarized in Table 1. The location for sample collection will be determined based upon the results of the field screening and engineering

judgment. The samples collected as part of this RI will be subject to analytical testing methodologies that follow NYSDEC Analytical Service Protocol (ASP) Category B deliverables and data validation. Further information regarding sampling and testing methodologies can be found in the QAPP (see Section 4.0).

Samples submitted for analytical testing will be given a unique sample designation. The sample designation will be done in accordance with the Sample Handling and Shipping FMG included in Appendix A.

2.4 SURVEY

The survey will be done after completion of the fieldwork to locate soil probes and monitoring wells. This will allow measurement of the actual exploration locations and elevations.

A licensed land surveyor will be subcontracted to do the survey. Vertical measurements will include a ground surface elevation, plus top of casing and top of riser for monitoring wells. The top of riser will serve as the water level monitoring point. Vertical measurements will be made relative to the National Geodetic Vertical Datum (NGVD). Monitoring point measurements and top of protective casing measurements will be accurate to within 0.01 foot. Horizontal measurements and ground surface elevations will be accurate to within 0.1 foot.

The base map for the Site will include pertinent Site features and the investigation exploration locations.

3.0 ADDITIONAL FIELD EXPLORATIONS

If determined to be necessary, contingent field explorations may be conducted. This work may consist of additional soil probes and monitoring well installations for supplemental soil and groundwater data to complement or fill in data gaps from the initial RI, if deemed necessary. If needed, a scope of work will be developed for review by NYSDEC prior to starting additional investigation activities. The work activities will be completed according to the procedures described in this RIWP and any subsequently approved modifications.

4.0 QUALITY ASSURANCE/QUALITY CONTROL

The Quality Assurance and Quality Control (QA/QC) for the Building 8 RI are discussed in the “GM Components Holdings, LLC, Brownfield Cleanup Program, Quality Assurance and Quality Control Plan, Building 7 (Site ID #C932138), Building 8 (Site ID #932139) and Building 10 (Site ID #C932140), Lockport Facility, 200 Upper Mountain Road, Lockport, New York” dated June 2010. The QA/QC Plan presents the objectives and

specific QA/QC procedures associated with the RI activities planned for Building 8. Protocols for sample collection, sample handling and storage, Chain of Custody procedures, and laboratory and field analyses are described or specifically referenced to related investigation documents.

5.0 HEALTH AND SAFETY PROTOCOLS

The health and safety protocols for the Building 8 RI are discussed in the “Site Health and Safety Plan, GM Components Holdings, LLC, Brownfield Cleanup Program, Building 7 (Site ID #C932138), Building 8 (Site ID #932139) and Building 10 (Site ID #C932140), Lockport Facility, 200 Upper Mountain Road, Lockport, New York” dated April 20, 2010. The Health and Safety Plan presents the specific health and safety protocols associated with the RI activities planned for Building 8.

6.0 SCHEDULE

The following schedule is associated with the Building 8 field activities and RI report preparation.

Submit Building 8 RI Work Plans:	June 18, 2010
Perform Building 8 RI: (Timing depends on coordinating subsurface investigations with manufacturing activities)	July through August 2010
Submittal of RI Report:	February 2011
Submittal of Alternative Analysis Report:	June 2011

7.0 CITIZEN PARTICIPATION

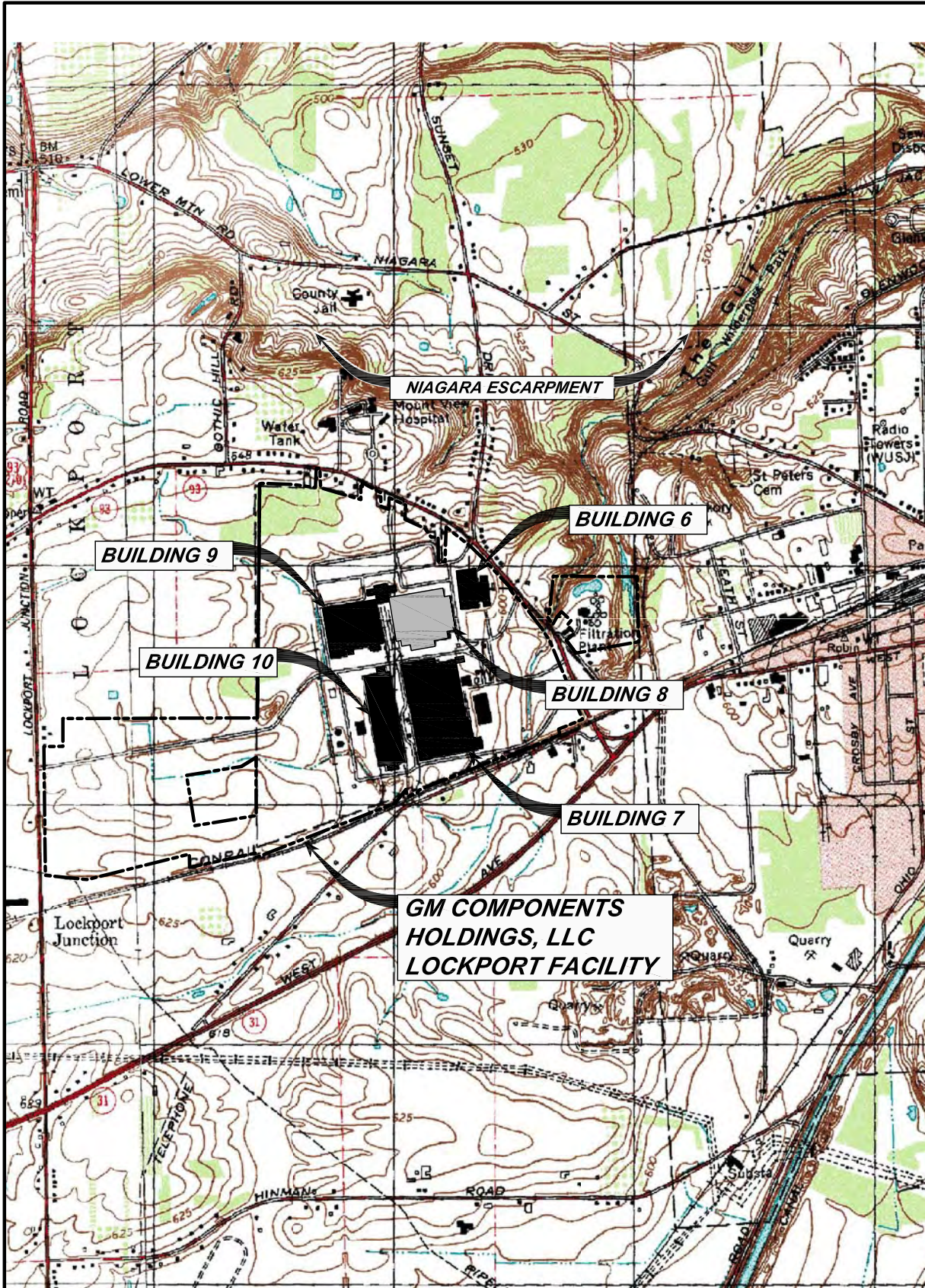
The Citizen Participation (CP) proponent for the Building 8 RI are discussed in the “Brownfield Cleanup Program, Citizen Participation Plans, GM Components Holdings, LLC, Building 7 Site ID #C932138, Building 8 Site ID #932139 and Building 10 Site ID #C932140, 200 Upper Mountain Road, City of Lockport, New York” dated June 2010. That CP Plan outlines how members of the affected and interested public are provided with information about how NYSDEC will inform and involve them during the investigation and remediation of the Site. Information such as project contacts, document repositories, site contact lists and CP activities are provided in the CP Plan.

Table 1
Proposed Analytical Testing Program Summary
Building 8 Remedial Investigation Work Plan
GM Components Holdings
Lockport, New York

Location	Matrix	TCL VOCs	TCL SVOCs	TAL Metals	TCL PCBs	TO-15 VOCs
Subsurface Soil Samples						
Various ¹	Soil	10	0	0	0	0
Duplicate	Soil	1	0	0	0	0
MS/MSD	Soil	2	0	0	0	0
Rinsate	Water	1	-	-	-	-
Total		14	0	0	0	0
Monitoring Well Groundwater Samples						
Monitoring Wells	Groundwater	8	0	0	0	0
Duplicate	Groundwater	1	0	0	0	0
MS/MSD	Groundwater	2	0	0	0	0
Rinsate	Water	1	0	0	0	0
Trip Blank	Water	1	-	-	-	-
Total		13	0	0	0	0
Air Samples						
Indoor Air	Air	0	0	0	0	5
Sub-slab Air	Air	0	0	0	0	5
Outdoor Air	Air	0	0	0	0	1
Duplicate	Air	0	0	0	0	1
MS/MSD	Air	0	0	0	0	2
Total		0	0	0	0	14
TOTAL		27	0	0	0	14

Notes:

- 1) Actual sample location to be selected based on field observation.
MS/MSD - Matrix Spike/Matrix Spike Duplicate.
TCL VOCs - Target Compound List Volatile Organic Compounds.
TCL SVOCs - Target Compound List Semi-volatile Organic Compounds.
TAL Metals - Target Analyte List Metals.
TCL PCBs - Target Compound List Polychlorinated Biphenyls.

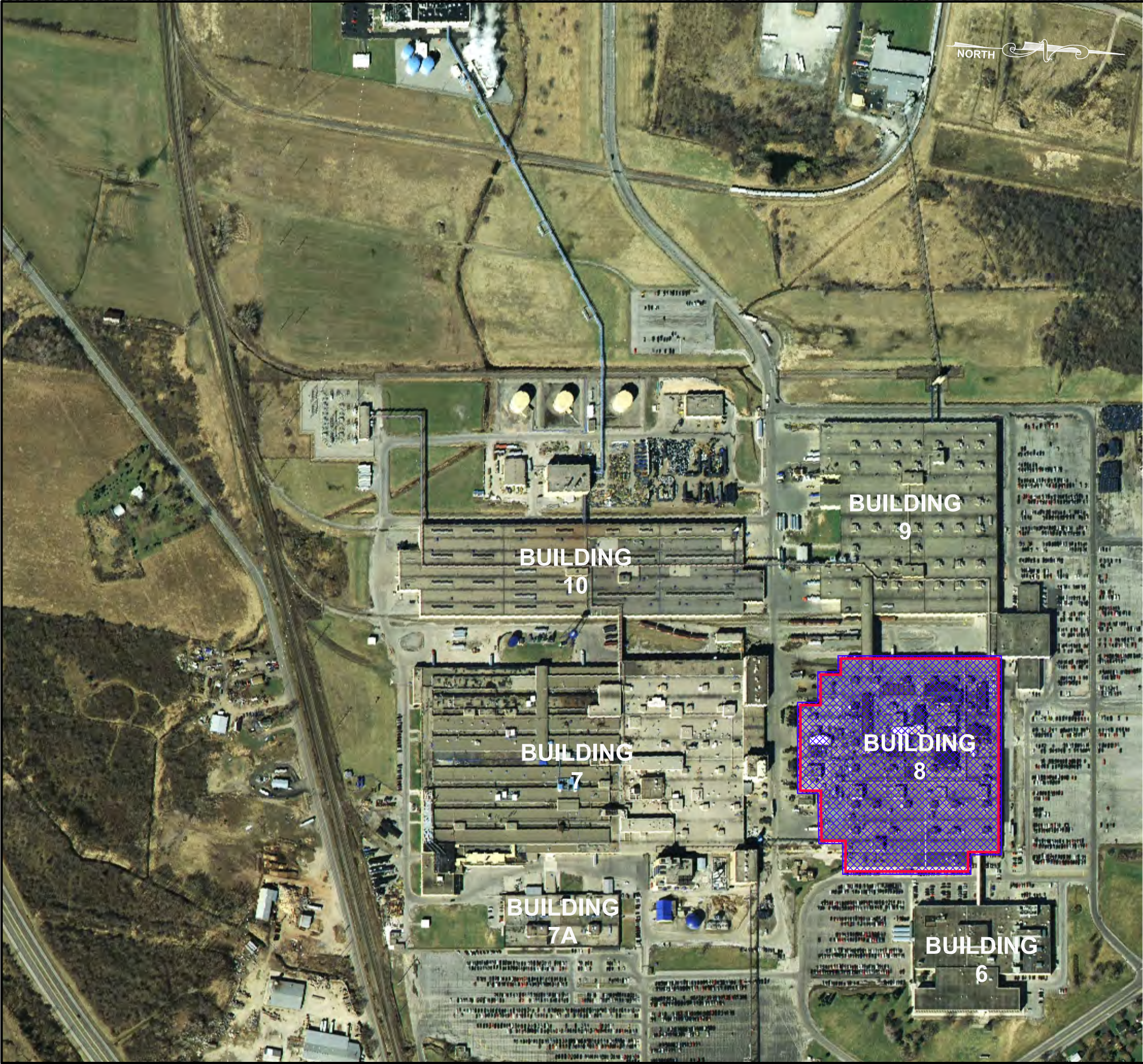


DRAWN BY: DEW DATE: JUNE 2010	
SCALE IN FEET 0 1000 2000 4000	
GM COMPONENTS HOLDINGS, LLC LOCKPORT FACILITY 200 UPPER MOUNTAIN ROAD LOCKPORT, NEW YORK BROWNFIELD CLEANUP PROGRAM WORK PLAN BUILDING 8 SITE ID# 932139 LOCUS PLAN	
PROJECT No. 21.0056546.00	
FIGURE No. 1	

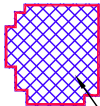
GZA GeoEnvironmental of New York

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





LEGEND:



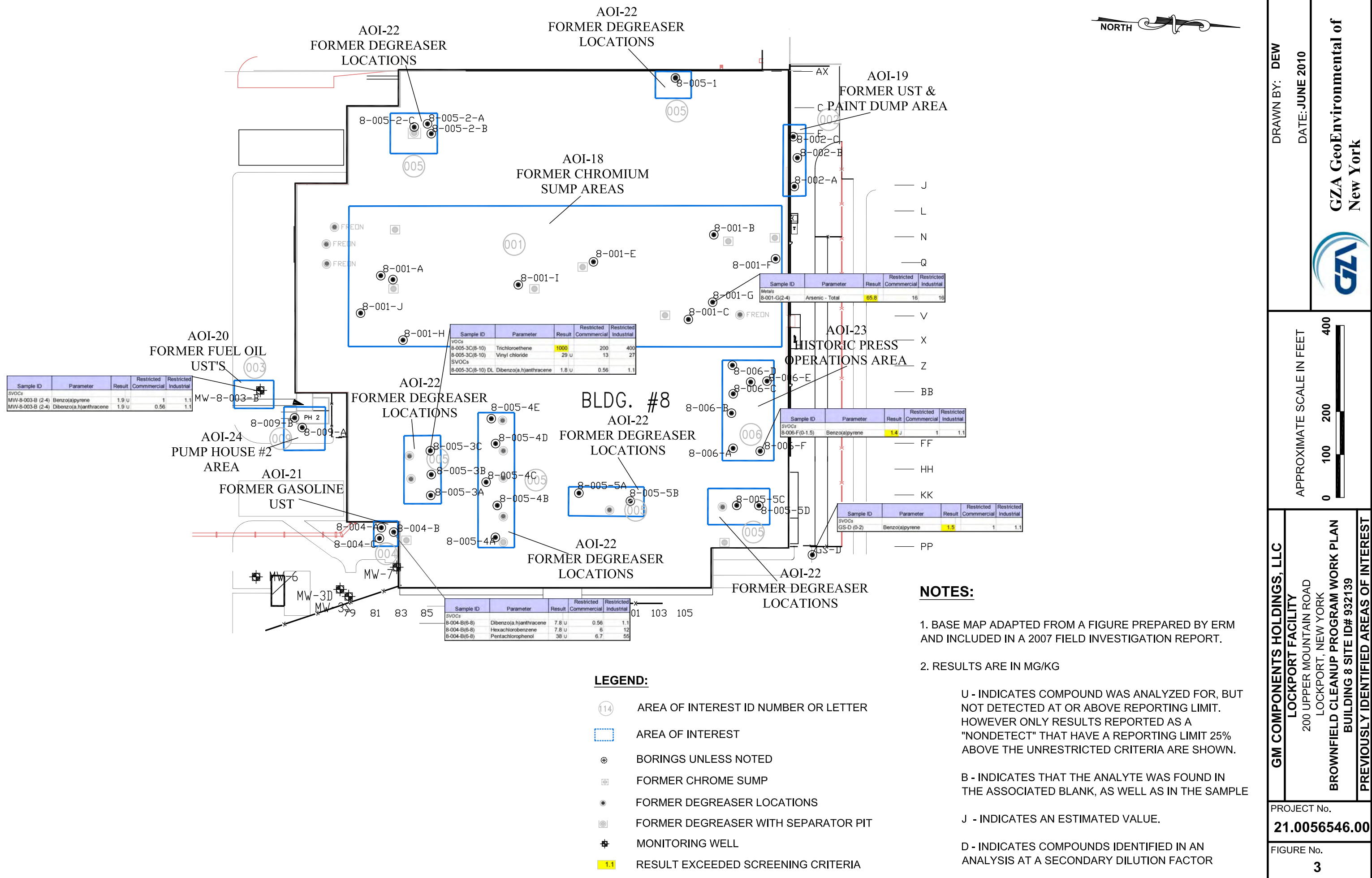
INDICATES BUILDING 8 FOOTPRINT

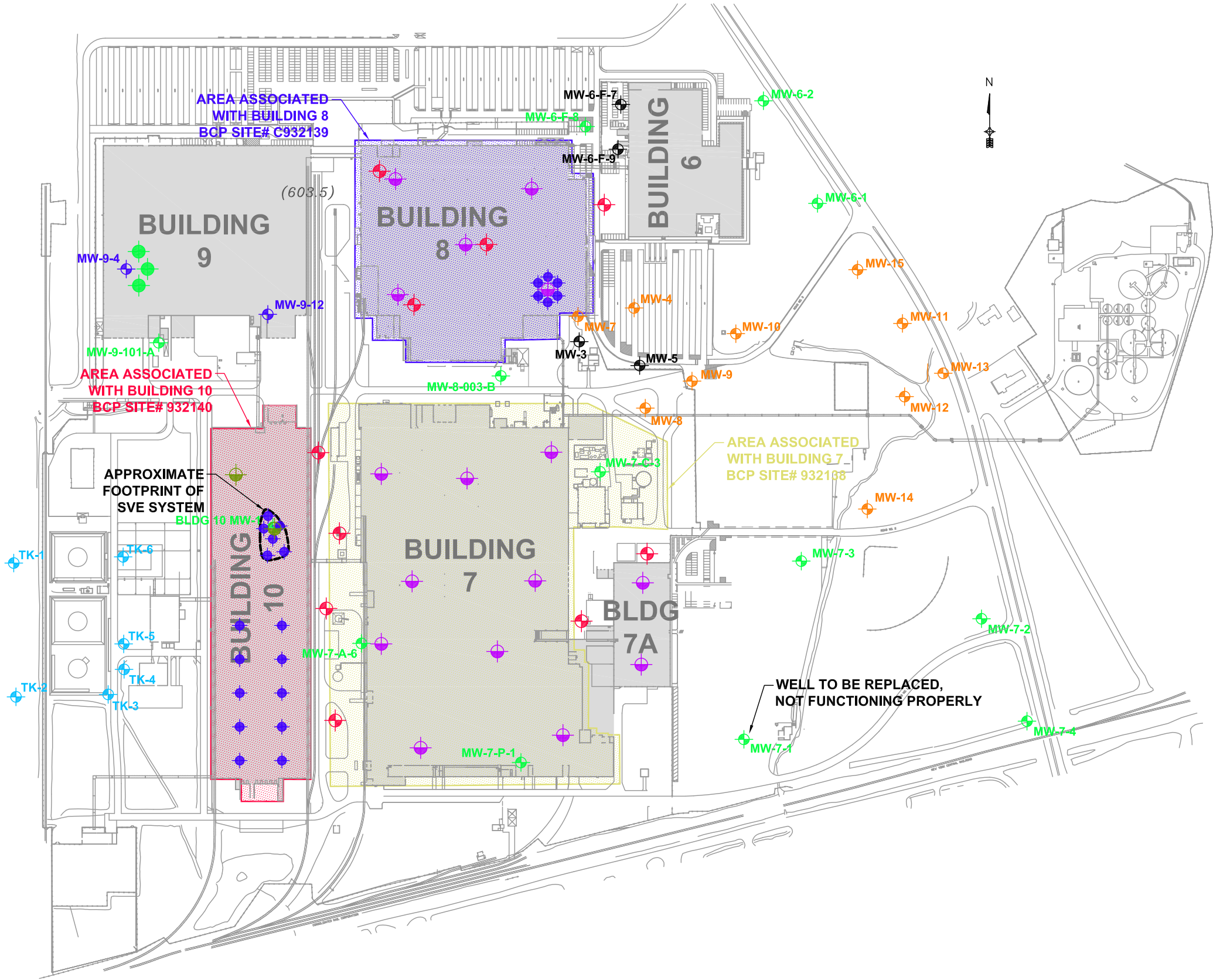
SHADING INDICATES AREA ASSOCIATED WITH BUILDING 8 BCP SITE

NOTES:

- 1. BASE MAP ADAPTED FROM A 2005 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: JUNE 2010		GZA GeoEnvironmental of New York	
APPROXIMATE SCALE IN FEET 0 200 400 800		GZA	
GM COMPONENTS HOLDINGS, LLC LOCKPORT FACILITY 200 UPPER MOUNTAIN ROAD LOCKPORT, NEW YORK		BROWNFIELD CLEANUP PROGRAM WORK PLAN BUILDING 8 SITE ID# 932139	
PROJECT No. 21.0056546.00		SITE PLAN	
FIGURE No. 2			






LEGEND:

- APPROXIMATE LOCATION OF PROPOSED BEDROCK MONITORING WELLS TO BE INSTALLED AND SAMPLED AS PART OF THE BCP INVESTIGATION (12 LOCATIONS)
- APPROXIMATE LOCATION OF PROPOSED SOIL PROBES TO BE COMPLETED AS PART OF THE BCP INVESTIGATION (22 LOCATIONS)
- APPROXIMATE LOCATION OF PROPOSED BEDROCK BOREHOLES TO BE COMPLETED AND ASSESSED AS PART OF THE BUILDING 9 SPILL ASSESSMENT (3 LOCATIONS)
- APPROXIMATE LOCATION OF PROPOSED INTERIOR AIR AND SUB-SLAB SAMPLES (16 LOCATIONS)
- APPROXIMATE LOCATION OF PROPOSED INTERIOR AIR SAMPLES ONLY (2 LOCATIONS)
- APPROXIMATE LOCATION AND DESIGNATION OF EXISTING MONITORING WELLS
- APPROXIMATE LOCATION AND DESIGNATION OF EXISTING MONITORING WELLS TO BE SAMPLED AS PART OF THE ANNUAL MNA MONITORING IN APRIL 2010
- APPROXIMATE LOCATION AND DESIGNATION OF EXISTING MONITORING WELLS TO BE SAMPLED AS PART OF THE BCP INVESTIGATION
- APPROXIMATE LOCATION AND DESIGNATION OF EXISTING MONITORING WELLS TO BE SAMPLED AS PART OF THE MOSF MONITORING REQUIREMENTS IN MAY 2010
- APPROXIMATE LOCATION AND DESIGNATION OF EXISTING MONITORING WELLS TO BE ASSESSED AS PART OF THE BUILDING 9 SPILL ASSESSMENT

NOTES:

- BASE MAP ADAPTED FROM A DRAWING PROVIDED BY DELPHI THERMAL AND INTERIOR SYSTEMS SEPT. 2007.
- THE SIZE AND LOCATION OF EXISTING SITE FEATURES SHOULD BE CONSIDERED APPROXIMATE.

<div>DRAWN BY: DEW</div> <div>DATE: JUNE 2010</div>		<div></div> <div>GZA GeoEnvironmental of New York</div>	
<div>APPROXIMATE SCALE IN FEET</div> <div><div>0200400800</div><div><div></div></div></div>			
<div>GM COMPONENTS HOLDINGS, LLC</div> <div>LOCKPORT FACILITY</div> <div>200 UPPER MOUNTAIN ROAD</div> <div>LOCKPORT, NEW YORK</div>			
<div>BROWNFIELD CLEANUP PROGRAM WORK PLAN</div> <div>BUILDING 8 SITE ID# 932139</div>			
<div>BCP SITES & SITE-WIDE INVESTIGATION PLAN</div>			
<div>PROJECT No.</div> <div>21.0056546.00</div>			
<div>FIGURE No.</div> <div>4</div>			



DATE: JUNE 2010



**GZA GeoEnvironmental of
New York**

APPROXIMATE SCALE IN FEET

LOCKPORT FACILITY
200 UPPER MOUNTAIN ROAD
LOCKPORT, NEW YORK

BROWNFIELD CLEANUP PROGRAM WORK PLAN
BUILDING 8 SITE ID# 932139

PROPOSED EXPLORATION PLAN

PROJECT No.

21.0056546.00

FIGURE No.

5

APPROXIMATE LOCATION OF PROPOSED BEDROCK
MONITORING WELLS TO BE INSTALLED AND SAMPLED
AS PART OF THE BCP INVESTIGATION



APPROXIMATE LOCATION OF PROPOSED SOIL PROBES
TO BE COMPLETED AS PART OF THE BCP
INVESTIGATION (6 LOCATIONS)



APPROXIMATE LOCATION OF PROPOSED INTERIOR
AIR AND SUB-SLAB SAMPLES



APPROXIMATE LOCATION AND DESIGNATION OF
EXISTING MONITORING WELLS TO BE SAMPLED AS PART
OF THE BCP INVESTIGATION

1. BASE MAP ADAPTED FROM A DRAWING PROVIDED BY
DELPHI THERMAL AND INTERIOR SYSTEMS SEPT. 2007.

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