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March 19, 2024 ***VIA EMAIL***

Mr. Ryan Richard, Assistant Geologist
NYSDEC Region 3 - Division of Environmental Remediation
21 South Putt Corners Road
New Paltz, NY 12561-1620

RE: Supplemental Remedial Investigation Work Plan (Soil Vapor Investigation Modification)
Former Mobile Media Inc. Site, NYSDEC Site No: C336093
Town of Crawford, Orange County
C.T. Male Project No: 19.9347

Dear Mr. Richard:

This letter work plan describes the scope of work proposed to complete the soil vapor intrusion (SVI) investigation portion of the Supplemental Remedial Investigation Work Plan (SRIWP) that will be submitted by C.T. Male in 2024 on behalf of the Participant, Mobile Media, Inc., for the NYSDEC Site No. C336093. This SVI portion of the SRIWP has been prepared in advance of the SRIWP to comply with the Department's request for completing an SVI investigation of three structures that are adjacent to the subject property (175 Kelly Avenue), during the current heating season that ends on or about March 31, 2024. The investigation will be performed in accordance with the New York State Department of Health's (NYSDOH) Final Soil Vapor Intrusion Guidance dated October 2006 (revised May 2017) and NYSDEC Division of Environmental Remediation (DER) Technical Guidance for Site Investigation and Remediation (DER-10, May 3, 2010). This scope of work will be implemented in accordance with the C.T. Male Draft SRIWP provided herein.

Background

The Site is located at 175 Kelly Avenue Pine Bush, Orange County New York 12566. The Site consists of one tax parcel which encompasses approximately 0.48 acres of land known on the Orange County Tax Map as S.B.L. 6-8-3. The coordinates for the approximate center of the Site are 41° 36' 23.9034" latitude and -74° 18' 3.33" longitude.

This Site features a single structure where Mobile Media Inc. previously operated a small commercial manufacturing facility, making specialty high density shelving for the

retail industry. Mobile Media Inc. has since relocated its operations to a facility in Ellenville, NY. The building is currently used as a tire storage warehouse and office space.

Southwest of and directly across Kelly Avenue from the Site, there is a small parking lot that is also owned by Mobile Media Inc. This parcel, which is not part of the BCP Site, is covered by parking lot and is sparsely wooded with trees and landscaping.

The Department has requested an SVI of three structures that are adjacent to the Site, as described below:

- A residence at 96 Borden Avenue (Tax ID: 6-8-2)
- The Mark Vail Auction Hall at 188 Kelly Avenue (Tax ID: 6-9-2)
- A residence at 192 Kelly Avenue (Tax ID: 6-9-7.122)

The approximate Site boundaries and adjacent parcels are depicted on Figure 1, Soil Vapor Sampling Locations. The results of this SVI investigation will be incorporated into the Draft Supplemental Remedial Investigation Report (SRIR).

Scope of Work

The scope of work proposed is to complete an SVI during the current 2023/2024 heating season. The results of this SVI will be used to inform and adapt the scope of the SRI of the subject property that is proposed for later this year as applicable. The following work will be implemented during this SVI initial phase of the Supplemental Remedial Investigation:

Residence at 96 Borden Avenue

- Install one (1) sub-slab vapor well in the basement of the existing structure and collect a sub-slab vapor sample (SS96-2024) adjacent to the foundation wall as close to the southwest corner as possible.
- Collect one (1) indoor ambient air sample (IA-BSMT96-2024) in the basement, co-located with the sub-slab vapor sample.
- Collect one (1) outdoor ambient air sample (OA96-2024) outside the building, within ten feet of the south or west building elevation.

The Mark Vail Auction Hall at 188 Kelly Avenue

- Install one (1) sub-slab vapor well in the basement of the existing structure and collected a sub-slab vapor sample (SS188-2024) adjacent to the foundation wall, as close to the northeast corner as possible.

- Collect one (1) indoor ambient air sample (IA-BSMT188-2024) in the basement, co-located with the sub-slab vapor sample.
- Collect one (1) outdoor ambient air sample (OA188-2024) outside the building, within ten feet of the north building elevation.

Residence at 192 Kelly Avenue

- Install one (1) sub-slab vapor well in the basement of the existing structure and collect a sub-slab vapor sample (SS192-2024) adjacent to the foundation wall as close to the northwest corner as possible. If the building owner does not permit drilling of the floor slab, a sub-slab vapor point will not be installed, and only indoor and outdoor ambient air samples will be collected.
- Collect one (1) indoor ambient air sample (IA-BSMT192-2024) in the basement, co-located with the sub-slab vapor sample.
- Collect one (1) outdoor ambient air sample (OA192-2024) outside the building, within ten feet of the west building elevation.

- Submit sub-slab vapor, indoor ambient air, outdoor ambient air, and a duplicate sample (a total of ten (10) samples) to a New York State Environmental Laboratory Accreditation Program (NYS ELAP) certified laboratory for volatile organic compound (VOC) analysis via EPA Method TO-15.

Sub-slab Vapor Point Installation and Vapor Sampling Methodology

Sub-slab soil vapor points will be installed, and samples will be collected in accordance with NYSDOH's SVI Guidance as described below. 24 hours prior to sampling, the heating systems in any vacant structures will be turned on and will operate to maintain normal indoor air temperatures (65°F to 75°F). The heating systems will remain operational until sub-slab soil vapor sampling is complete.

Temporary sub-slab soil vapor points will be installed using a hand-held hammer drill with a concrete drill bit. The drill bit will be extended a maximum two inches below the floor slab for sub-slab soil vapor samples. At the terminal depth of sub-slab soil vapor locations, the sample probe will be attached to ¼-inch diameter non-reactive tubing and extended to the surface. The borehole above the sampling probe to grade will be sealed using an inert sealant to prevent ambient air mixing with the soil vapor. Ambient air will be purged from the boring hole by attaching the surface end of the ¼-inch diameter non-reactive tube to an air valve and then to a vacuum pump. The vacuum pump will remove no more than one to three volumes of air (volume of the sample probe and

tube) prior to sample collection. The flow rate for both purging and sample collection will not exceed 0.2 liters per minute.

The sub-slab soil vapor samples will be first screened for VOCs using a photoionization detector (PID). A tracer gas (helium) will be used in accordance with the NYSDOH protocols to evaluate the integrity of the soil vapor probe seal. Helium will be used as the tracer gas and a bucket shroud will serve to keep it in contact with the probe during testing. A portable monitoring device will be used to analyze a sample of soil vapor from the tracer prior to sampling. Although there is an allowable amount of tracer gas that can be detected as per the NYSDOH SVI Guidance, if the tracer sample results show any presence of the tracer gas, the probe seals will be adjusted to prevent infiltration which would result in the generation of inaccurate (likely biased low) results.

A sample log sheet will be maintained summarizing sample identification, date and time of sample collection, sampling depth, identity of samplers, sampling methods and devices, soil vapor purge volumes, volume of the soil vapor extracted, vacuum of canisters before and after the samples are collected, apparent moisture content of the sampling zone and chain of custody. A building questionnaire and product inventory will be completed, if possible, in accordance with NYSDOH's SVI Guidance.

Sub-slab soil vapor samples will be collected in laboratory-supplied 6-liter Summa canisters using twenty-four-hour regulators. All samples will be sealed, labeled, and placed in a secure container for delivery to a NYSDOH ELAP-certified analytical laboratory. Sub-slab soil vapor samples will be analyzed for EPA Method TO-15 VOCs. Analytical methods will achieve a minimum reporting limit of 1.0 micrograms per cubic meter (ug/m3) for all sub-slab samples.

Indoor Air and Ambient Air Sampling Methodology

Indoor air and ambient air samples will be collected in accordance NYSDOH's SVI Guidance as described below. 24 hours prior to sampling, the heating systems in any vacant structures will be turned on and will operate to maintain normal indoor air temperatures (65°F to 75°F). The heating systems will remain operational until indoor air sampling is complete.

An indoor air sample will be co-located with a sub-slab soil vapor sample within the lowest level of each building. Both indoor and outdoor ambient air samples will be collected from breathing height (three to five feet above the floor). A secure, upwind location will be selected for the collection of the exterior (outdoor) ambient sample. The

sampling flow rate will not exceed 0.2 liters per minute (L/min). Sampling will occur for a duration of twenty-four hours. A sample log sheet will be maintained summarizing sample identification, date and time of sample collection, sampling depth, identity of samplers, sampling methods and devices, soil vapor purge volumes, volume of the soil vapor extracted, vacuum of canisters before and after the samples are collected, apparent moisture content of the sampling zone, and chain of custody protocols. A building questionnaire and product inventory will be completed, if possible, in accordance with NYSDOH's SVI Guidance.

Samples will be collected in laboratory-supplied 6-liter Summa canisters using twenty-four- hour regulators and will be sealed, labeled, and placed in a secure container for delivery to a NYSDOH ELAP-certified analytical laboratory. All samples will be analyzed for EPA Method TO-15 VOCs. For indoor air samples, analytical methods will achieve a minimum reporting limit of 1.0 micrograms per cubic meter (ug/m3) for methylene chloride, tetrachloroethene and 1,1,1- trichloroethane; additionally, methods will achieve a minimum reporting limit of 0.2 ug/m3 for carbon tetrachloride, 1,1-dichloroethene, cis-1,2-dichloroethene, trichloroethene and vinyl chloride.

Quality Assurance/Quality Control

Sub-slab soil vapor, indoor air and ambient air samples will be collected in accordance with the Quality Assurance Project Plan (QAPP) included as Appendix B of the NYSDEC approved RIWP. The laboratory will report sample results on a standard turn-around time. An independent sub-consultant will validate sample results and a Data Usability Summary Report (DUSR) will be prepared.

Health and Safety

All work at the Site will be completed in accordance with the Health and Safety Plan (HASP) prepared specifically for this project. The HASP will be amended to address collecting samples in private residences.

Reporting

The findings of the soil vapor investigation will be incorporated into a draft SRIWP and submitted to NYSDEC and NYSDOH for review. We will review the results with you, especially if the findings may alter future remedial investigations.

Interim Remedial Measure

A Sub-Slab Depressurization System (SSDS) will be installed within the Site building at 175 Kelly Avenue as an Interim Remedial Measure. Installation of this system is required by the NYSDOH Decision Matrix based on the 2021 sub-slab vapor / indoor air results. Permanent soil vapor pins will also be installed within the basement floor slab during the IRM to facilitate future sub-slab sampling and monitoring of the SSDS vacuum pressure field(s). Indoor air sampling will not be performed during the 2023/2024 heating season since air sampling within this building will be performed immediately following installation and activation of the SSDS system.

Proposed Schedule

The proposed schedule for IRM and other site investigation activities for this project is as follow:

Proposed Schedule Remedial Action / Remedial Investigation Deliverables and Field Activities	
Submittal / Activity	**Proposed Date (on or about)**
IRM Activities	
Draft Interim Remedial Measure Work Plan – SSDS at 175 Kelly Avenue	April 30, 2024
Respond to DEC/DOH Comments on Draft IRM SSDS WP, Submit Final	May 30, 2024
Installation of SSDS and Completion of Indoor Air Sampling at 175 Kelly Avenue	June 30, 2024
Supplemental Remedial Investigation Activities	
Sub-Slab Vapor & Ambient Air Sampling of Properties Adjacent to Site	March 26 and 27, 2024
Draft Supplemental Remedial Investigation Work Plan	May 1, 2024
Respond to DEC/DOH Comments on Draft SRI WP, Submit Final	June 30, 2024
SRI Field Activities	July 15, 2024
Draft SRI Report	September 15, 2024

Please contact me with any questions or if further information is needed. You can reach me at: (845) 454-4400 or e.white@ctmale.com.

Sincerely,

C.T. MALE ASSOCIATES

Eric White

Eric White
Environmental Scientist IV

Attachments: Figure 1: Soil Vapor Sample Locations

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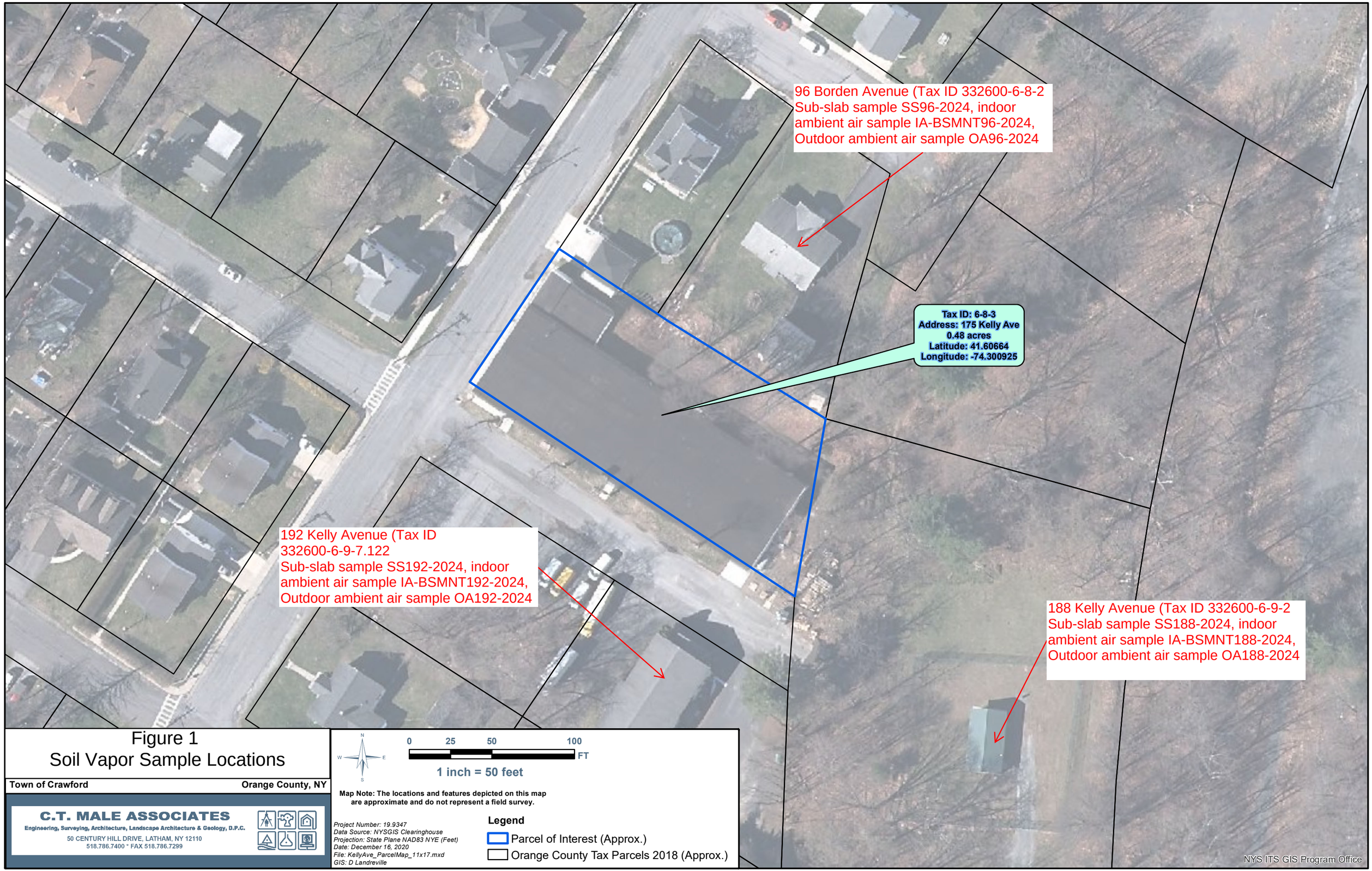

Figure 1
Soil Vapor Sample Locations

Town of Crawford — **Orange County, NY**

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N / W / E / S

0 25 50 100 FT

1 inch = 50 feet

Map Note: The locations and features depicted on this map are approximate and do not represent a field survey.

Project Number: 19.9347
Data Source: NYSGIS Clearinghouse
Projection: State Plane NAD83 NYE (Feet)
Date: December 16, 2020
File: KellyAve_ParcelMap_11x17.mxd
GIS: D Landreville

Legend

- Parcel of Interest (Approx.)
- Orange County Tax Parcels 2018 (Approx.)