

March 3, 2024

Mr. Michael J. Keller, E.I.T.
Project Manager
New York State Department of Environmental Conservation
700 Delaware Avenue
Buffalo, NY 14209

Re: Work Plan for Soil Vapor Intrusion Sampling
Bisonite Paint Company Site
NYSDEC Site No. C915010

Dear Mr. Keller:

Leader Professional Services, Inc. ("Leader") has prepared the enclosed Work Plan for Soil Vapor Intrusion Sampling ("SVI Work Plan") for the former Bisonite Paint Company facility, 2266 Military Road, Tonawanda, New York on behalf of the property owner, Tonawanda Storage Properties LLC. The SVI Work Plan has been developed to be consistent with the Additional SVI Work Plan dated June 22, 2023 that was subsequently approved by the New York State Department of Environment Conservation (NYSDEC) on July 6, 2023 (field work was completed on August 28, 2023).

The primary objectives of this proposed sampling event are to:

- Confirm previously collected indoor air quality data.
- Collect current air quality data during the 2024 heating season.
- Collect additional indoor air quality data to support the development of a Site Management Plan.
- Evaluate the potential for exposure via soil vapor intrusion to current and future building occupants.

A discussion of the proposed scope of work is provided below.

1.0 SCOPE OF WORK

Portions of the former Bisonite Paint Company building are located both within the boundary of the Brownfield Cleanup Program ("BCP") ("on-Site") and outside of the BCP ("off-Site"); therefore, SVI sampling will be completed from representative portions of the entire building. Similar to the most recent SVI sampling, the following building characteristics and logistical considerations were evaluated when selecting the locations of the samples:

- Locations with the closest proximity to the potential source of impacts were prioritized.
- Locations where tenant employees physically occupy a rental space on a regular or full-time basis were prioritized.
- The physical and logistical ability to access a storage area to core the concrete floor was considered.

- The building's construction was considered. Note that the elevation of the concrete floor is approximately 4-feet above grade at the front (i.e., east side) of the building, and at grade on the back side (i.e., west side) of the building.

Based on the above criteria, four (4) locations for indoor air sampling and four (4) locations for sub-slab were selected for collection and laboratory analysis during the 2024 heating season. In addition, one (1) outdoor/ambient, upwind sample will also be collected for analysis. The indoor air and sub-slab sample locations will be co-located to the extent practicable. The sampling locations may be modified based on inspection of the interior of the building and logistical issues. Any significant re-location of sampling points will be discussed with the NYSDEC prior to sampling. The "pairs" of sub-slab and indoor air samples will be collected concurrently. The approximate locations of the samples are shown on **Figure 1**.

Prior to collection of indoor air samples, the Structure Sampling Questionnaire and Building Inventory forms provided in the New York State Department of Health (NYSDOH) Guidance for Evaluating Soil Vapor Intrusion in the State of New York (October 2006), with updates (SVI Guidance Document) will be completed prior to sampling, which will include a product inventory to determine if there are potential sources of indoor air volatile organic compounds ("VOCs").

The sub-slab soil vapor samples will be collected from temporary sampling points consistent with the procedures described in Section 2.7.2 of the SVI Guidance Document. At each sub-slab sampling location, a small diameter penetration will be made through the concrete slab floor using a hammer drill, or similar. The soil vapor probes will be sealed above the sampling zone to prevent outdoor air infiltration. The tubing used to collect sub-slab soil vapor samples will not extend further than 2-inches into the sub-slab material. Indoor air sampling will be completed consistent with Section 2.7.3 of the SVI Guidance Document, and the outdoor ambient air sampling will be completed consistent with Section 2.7.4 of the SVI Guidance Document. For each sampling point, one to three implant volumes (i.e., the volume of the sample probe and tube) will be purged prior to collecting the samples. Flow rates for both purging and collecting samples will not exceed 0.2 liters per minute.

Twenty-four (24) hours prior to conducting the sampling, unnecessary opening of the exterior doors and windows or venting of the office and warehouse area will be discouraged. Helium will be used to confirm the seal integrity during collection of sub-slab vapor samples. If helium is detected above the 10% criteria, as required by the NYSDOH SVI Guidance Document the seal will be enhanced, and tracer testing will be repeated prior to sample collection until criteria is met.

Each sample will be collected over an 8-hour period using SUMMA canisters and sent to a NYSDOH-certified laboratory for analysis of VOCs using USEPA method TO-15. The contract laboratory will provide ASP Category B data packages.

During the sampling event, each sample location will be photographed. Field notes will include sample identification, air temperature, apparent moisture content (dry, moist, saturated, etc.) of the sampling zone, wind direction (ambient air sample), photoionization detector ("PID") measurements from the sampling point tubing, and chain of custody information. In addition, sample collection start and finish times and SUMMA canister pressure/vacuum readings will be recorded for each sample. Each sample point will be located on a figure by triangulating/measuring from a minimum of three fixed points.

2.0 HEALTH AND SAFETY

All project personnel will acknowledge and follow the existing Site Health and Safety Plan (“HASP”) during Site activities. A copy of the HASP will be maintained on Site at all times during work activities.

3.0 QUALITY ASSURANCE/QUALITY CONTROL

The existing Quality Assurance Project Plan (“QAPP”) will be followed during sample collection, handling, and shipping activities. Laboratory data packages will be reviewed by a qualified individual and a Data Usability Summary Report (“DUSR”) prepared.

4.0 REPORTING

Upon completion of data review, a sampling report will be prepared and submitted to the NYSDEC and New York State Department of Health (“NYSDOH”) for review. The report will include appropriate tables and figures necessary to understand and interpret the data along with photographic documentation of the sample locations.

5.0 SCHEDULE

Leader would like to complete the indoor air and sub-slab sampling as soon as possible. Leader appreciates the NYSDEC’s and NYSDOH’s efforts to provide timely reviews so that the proposed sampling can be conducted during the 2024 heating season.

Tonawanda Storage Properties, LLC’s objective is to complete the site remediation during early March 2024. Upon completion of remediation, a Final Engineering Report and a SMP will immediately be prepared and submitted for NYSDEC approval. The SMP will include requirements for SVI sampling during the heating season.

If any aspect of our Scope of Work requires clarification or discussion, please contact me (585) 248-2413, or email me at bahrens@leaderlink.com.

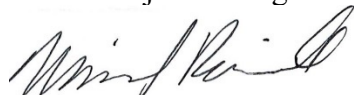
Regards,

LEADER PROFESSIONAL SERVICES, INC.

A handwritten signature in black ink, appearing to read "Bruce W. Ahrens".

Bruce W. Ahrens

Senior Project Manager

A handwritten signature in black ink, appearing to read "Michael P. Rumrill".

Michael P. Rumrill

President

Attachments:

Figure 1 – Sampling Locations

