

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Environmental Remediation, Region 9  
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[www.dec.ny.gov](http://www.dec.ny.gov)

March 13, 2025

John Stevens  
Tonawanda Storage Properties LLC  
18 North Main Street  
Pittsford, New York 14534

Dear John Stevens,

**Bisonite Paint Co. Site, No.: C915010  
Tonawanda, NY – Erie County  
2025 SVI Sampling Work Plan**

The New York State of Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) have reviewed the 2025 Soil Vapor Intrusion Sampling Work Plan (SVIWP) for the above referenced site. Based on our review, the work plan is conditionally accepted with the following minor revisions:

- Page 2 states that the investigation “will include a product inventory by tenant to determine if there are potential sources of indoor air volatile organic compounds (VOCs)”. The inventory should be completed by the consultant in consultation with the owner/tenant. Ensure that the product inventory be performed consistent with the March 2024 investigation.
- Page 2 states “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.” Ensure that the building’s heating systems be in operation during this 24-hour period prior to, and throughout the duration of sampling.

Prior to the start of any field work, please provide the Department with at least 7 days of advance notice. If you have any questions, feel free to contact me at [michael.keller@dec.ny.gov](mailto:michael.keller@dec.ny.gov) or (716) 851-7218.

Sincerely,



Michael Keller, E.I.T.  
Project Manager



Department of  
Environmental  
Conservation

John Stevens  
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MK: ef

ec: Andrea Caprio, P.E., Regional Remediation Engineer, NYSDEC Region 9  
Benjamin McPherson, P.E., Professional Engineer 1, NYSDEC Region 9  
Joshua Vaccaro, Assistant Engineer, NYSDEC Region 9  
Gregory Scholand, Esq., Project Attorney, NYSDEC Region 9  
Sara Bogardus, P.E., Assistant Bureau Director, NYSDOH Albany  
Shaun Surani, Public Health Specialist, NYSDOH Albany  
Timothy P. Sheehan, ACM Northfield CR#3, LLC  
Michael Rumrill, Leader Professional Services, Inc.  
Bruce Ahrens, Leader Professional Services, Inc.  
Steven Turybury, P.E., Marsh Engineering D.P.C.  
Alan J. Knauf, Esq., Knauf Shaw, LLP

February 26, 2025

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

Re: 2025 Soil Vapor Intrusion Sampling Work Plan  
Bisonite Paint Company Site  
NYSDEC Site No. C915010

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Dear Mr. Keller:

This letter work plan is notification of Leader Professional Services, Inc.'s ("Leader's")/Marsh Engineering DPC ("Marsh's") intent to conduct soil vapor intrusion ("SVI") sampling during the 2024/2025 heating season at the former Bisonite Paint Company facility, 2266 Military Road, Tonawanda, New York on behalf of the property owner, Tonawanda Storage Properties LLC.

The sampling procedures, protocols, and sampling locations will be consistent with the New York State Department of Environmental Conservation- (NYSDEC-) approved Work Plan for Soil Vapor Intrusion Sampling ("SVI Work Plan") dated March 4, 2024.

Consistent with the previous 2023 and 2024 sampling events, the primary objectives of this sampling event are to:

- Confirm previously collected indoor air quality data.
- Collect current air quality data during the 2025 heating season.
- Collect additional indoor air quality data to satisfy the requirements of the Draft Site Management Plan (currently under review).
- Evaluate the potential for exposure via soil vapor intrusion to current and future building occupants.

SVI sampling locations were selected from representative portions of the entire building. Similar to the previous SVI sampling events, the following building characteristics and logistical considerations were evaluated when selecting the locations of the samples:

- Locations with the closest proximity to the remaining 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.

The approximate locations of the samples will be consistent with Figure 1 that was included in the March 4, 2024 SVI Work Plan. A copy of that figure is attached.

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 by tenant 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 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**

The SVI sampling will be conducted by the end of the heating season, generally considered to be March 31<sup>st</sup>.

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](mailto: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

