BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

June 21, 2021

Mr. Andrew Zwack
Assistant Engineer
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2915

Re: Tecumseh Phase II Business Park, Lackawanna, NY
Site Nos. II-9 (C915198I) and II-10 (C915198J)
Work Plan for Pre-Occupancy Radon Testing

Dear Mr. Zwack:

On behalf of Time Release Properties, LLC (TRP), Benchmark Environmental Engineering & Science, PLLC (Benchmark) is herein providing our scope of work to complete pre-occupancy radon testing inside the newly constructed building on Brownfield Cleanup Program (BCP) Sites II-9 and II-10 (see Figure 1).

BACKGROUND

TRP owns and is redeveloping Tecumseh Phase II Business Park Site II-9 and a portion of Site II-10 for Time Release Sciences, Inc. (dba TRS Packaging, a subsidiary of TMP Technologies) dedicated to producing custom consumer components including the Mr. Clean Magic Eraser® product line for Procter & Gamble. Construction is substantially complete on an approximate 280,000-square foot (SF) manufacturing facility and an approximate 9,200-SF office building that will serve as the company's new headquarters.

During building site grading activities, the presence of subgrade debris from historic structures, including substantial quantities of brick, were identified. The NYSDEC requested and TRP agreed to install radon abatement piping beneath the structure to facilitate conversion to an active subslab depressurization system, if needed, based on post-construction radon testing. The site contractor installed 4" perforated pipe in an east-west direction throughout the building footprint in the subbase aggregate material beneath the building floor slab and vapor barrier. Record drawings presenting a plan view and details of the piping are presented as Figures 6 and 7 of the December 2020 Final Engineering Report (FER) and are attached hereto for reference (Attachment 1). Six independent 4" pipeline runs were installed; all six pipelines exit the interior footprint of the building through the west foundation wall.

2558 Hamburg Turnpike, Suite 300 | Buffalo, NY 14218
phone: (716) 856-0599 | fax: (716) 856-0583

As construction of the entire building has been completed and the building is fully enclosed with a functioning HVAC system, Benchmark is proposing a scope of work for the completion of interior, pre-occupancy radon testing.

SCOPE OF WORK

Benchmark is proposing that the interior radon testing will be completed with eight 4" charcoal canisters. Two of the canisters will be located within the office area and six will be spread out within the manufacturing area (see Figure 2 for approximate test locations). The radon testing work will be completed by Richard F. Pezzino (NYS License # 16000005200) of Accu-View Property Inspections, Inc. Mr. Pezzino is a certified Radon Measurement Specialist Certification # 1SS0032 (see Attachment 2). Benchmark will provide oversight of the testing.

All windows and doors will be closed throughout the sampling period. Once the testing is completed, which will require between 48-72 hours, the canisters will be analyzed for radon via USEPA-402-R-92-004 be a NYS Environmental Laboratory Approval Program (ELAP) Certified Laboratory. Results will be summarized and presented in a report including a narrative description of the event, photos of deployed canisters, and the laboratory report. Any results greater than 4 pCi/L will be flagged and discussed in the report, with recommended follow-up actions as needed.

PROPOSED SCHEDULE

Benchmark is prepared to schedule the work immediately upon NYSDEC approval of this Work Plan. We anticipate this radon testing work to be completed within 2-4 weeks. The facility is scheduled to begin full scale operations in August 2021.

Please contact us if you have any questions or require additional information.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC

Thomas H. Forbes, P.E.
President

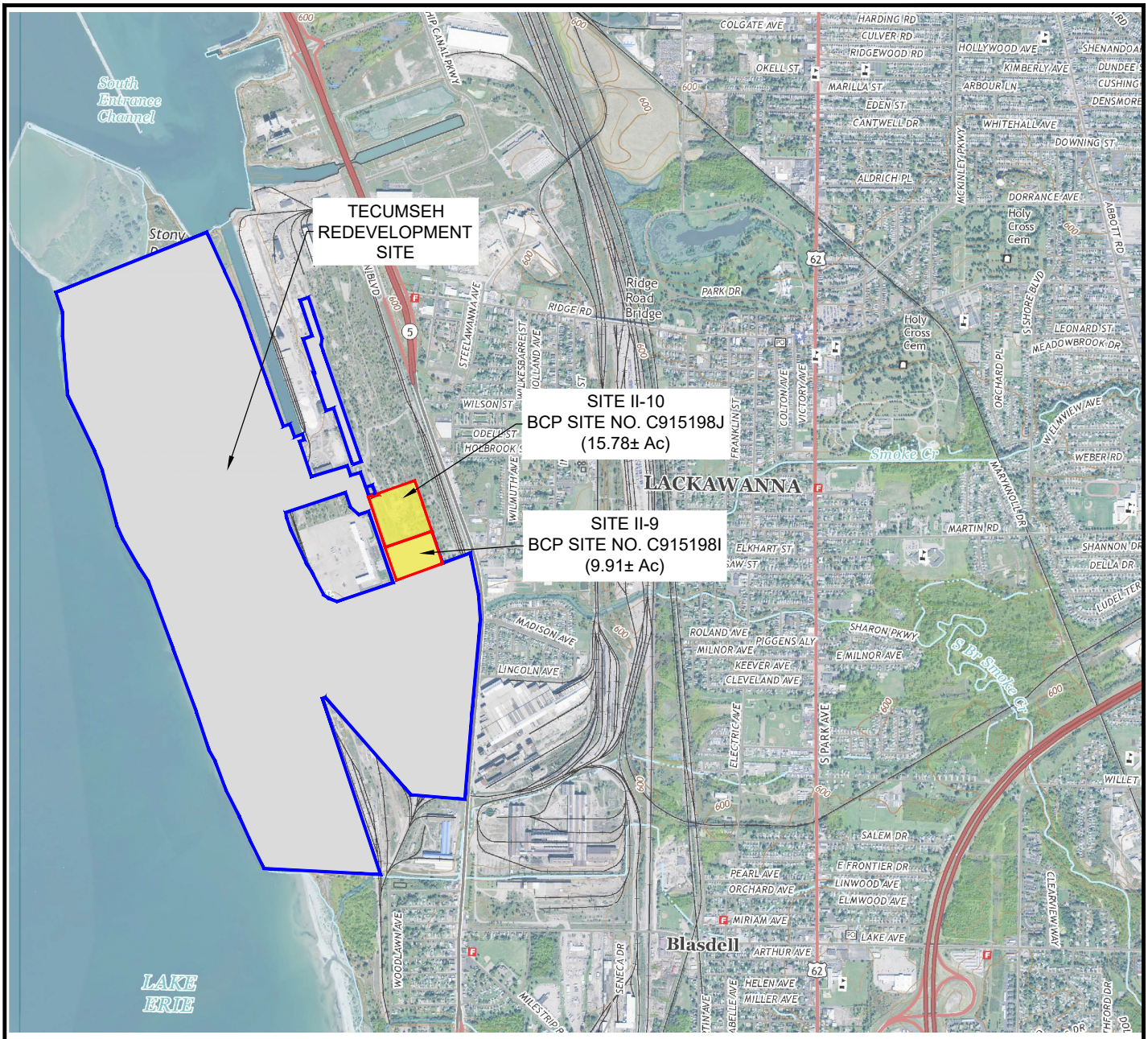
Att.

ec: Ms. Sara Bogardus (NYSDOH)
Mr. Robert Laughlin (TMP)
Mr. Luke Stewart (TMP)
E. Warren (Benchmark-TurnKey)

FIGURES

F:\CAD\Benchmark\TMP\Radon\2021 Radon Work Plan\Figure 1; Site Location & Vicinity Map.dwg, 6/15/2021 12:59:27 PM

FIGURE 1



2,500' 0' 2,500' 5,000'

SCALE: 1 INCH = 2,500 FEET
SCALE IN FEET
(approximate)

N

LEGEND:

TECUMSEH PROPERTY

TRP SITE

BASE MAP USGS QUAD BUFFALO SE 2016

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC

2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0599

PROJECT NO.: 0489-019-002

DATE: JUNE 2021

DRAFTED BY: RFL

SITE LOCATION AND VICINITY MAP

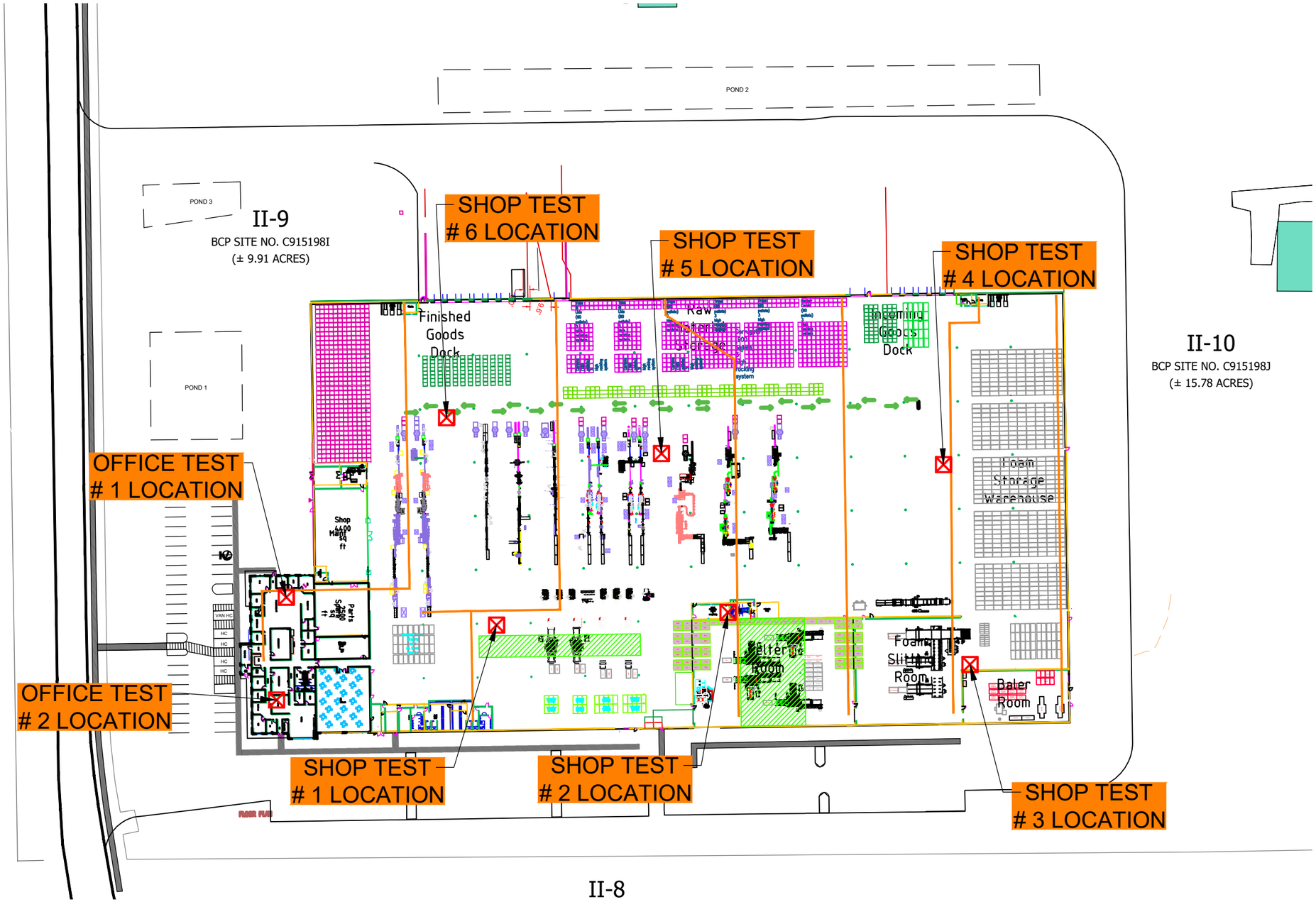
WORK PLAN FOR RADON TESTING

TECUMSEH PHASE II BUSINESS PARK
SITE NO.s II-9 (C915198I) & II-10 (C915198J)
LACKAWANNA, NEW YORK

PREPARED FOR

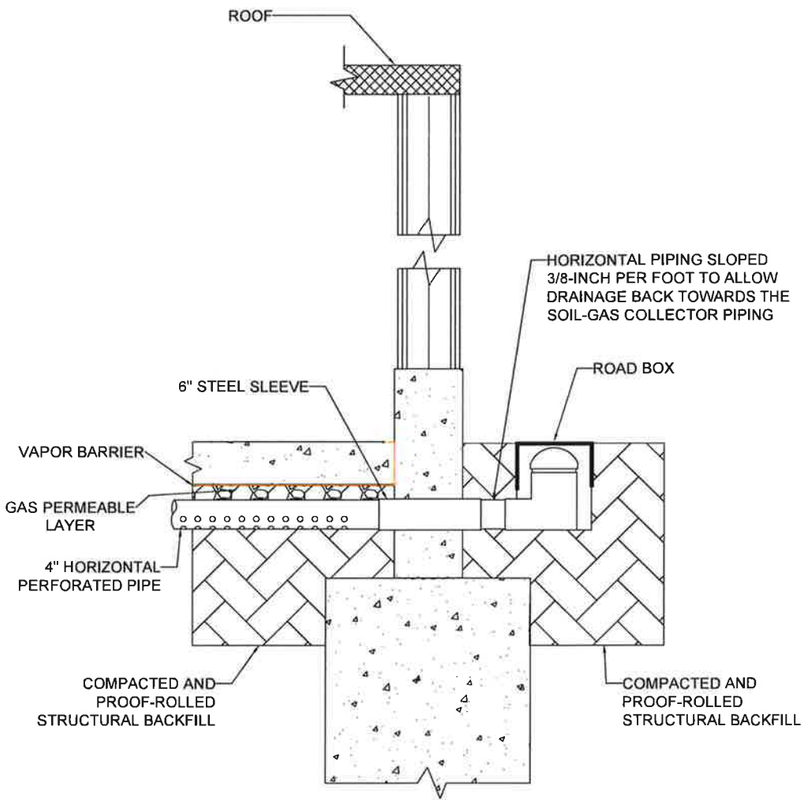
TIME RELEASE PROPERTIES, LLC

F:\CAD\Benchmark\TMP\Radon\2021 Radon Work Plan\Figure 2- Sample Locations.dwg 6/15/2021 1:57:26 PM


POND 2
POND 3
POND 1
II-9
BCP SITE NO. C915198I
(± 9.91 ACRES)
II-10
BCP SITE NO. C915198J
(± 15.78 ACRES)
SHOP TEST # 6 LOCATION
SHOP TEST # 5 LOCATION
SHOP TEST # 4 LOCATION
OFFICE TEST # 1 LOCATION
OFFICE TEST # 2 LOCATION
SHOP TEST # 1 LOCATION
SHOP TEST # 2 LOCATION
SHOP TEST # 3 LOCATION
Finished Goods Dock
Raw Material Dock
Incoming Goods Dock
Foam Storage warehouse
Shop 44,00 Main 84 ft
Shop 2400 ft
Shop 1200 ft
Shop 1200 ft
Shop 1200

ATTACHMENT 1

F:\CAD\Benchmark\TMP\FER\Figure 8; Radon Remediation 11x17 scal ng dwg, 12/16/2020 1:20:27 PM

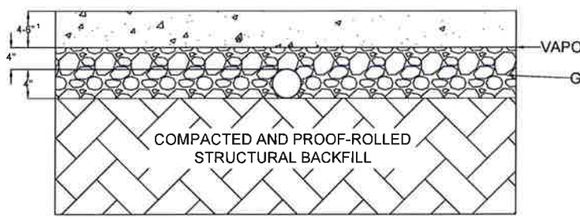


SPECIFICATIONS

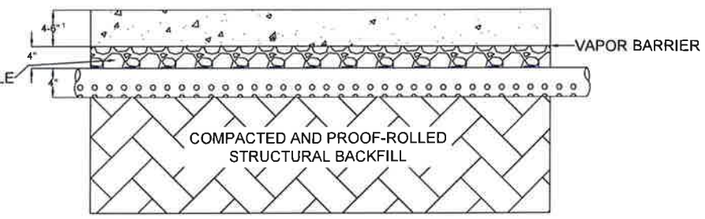
1. NO. 1 "CLEAN" CRUSHED STONE WAS USED FOR THE GAS PERMEABLE LAYER.
2. 2"-MINUS BENEFICIAL USE DETERMINATION (BUD) SLAG WAS USED FOR THE STRUCTURAL BACKFILL.
3. SUB-SLAB HORIZONTAL PIPING IS 4-INCH NOMINAL DIAMETER SDR 35 PVC PERFORATED PIPE.
4. PLASTIC PIPING THROUGH FOUNDATIONS WAS BE SLEEVED WITHIN 6-INCH NOMINAL DIAMETER SCHEDULE 40 STEEL PIPE.
5. ABOVE GRADE VERTICAL EXHAUST PIPING (IF NEEDED) SHALL BE 6-INCH NOMINAL DIAMETER SOLID SDR 35 PVC PIPE.
6. VAPOR BARRIER MEMBRANE IS POLYETHYLENE SHEETING 6 MILS IN THICKNESS
7. SEALANT USED IS POLYURETHANE CAULK (ASTM C920 CLASS 25)

INSTALLATION INSTRUCTIONS

1. THE STRUCTURAL BACKFILL WAS COMPACTED AND PROOF-ROLLED PRIOR TO INSTALLATION OF THE HORIZONTAL PERFORATED PIPING.
2. 8-INCHES OF NO. 1 "CLEAN" CRUSHED STONE WAS PLACED BENEATH THE SLAB (REPRESENTING THE GAS PERMEABLE LAYER). THE HORIZONTAL PIPE WAS PLACED ON TOP OF THE COMPACTED AND PROOF-ROLLED STRUCTURAL SUB-BASE AND THE NO. 1 STONE WAS PLACED SUCH THAT 4" ARE ABOVE THE PIPE (I.E., FROM THE TOP OF PIPE TO BOTTOM OF FLOOR SLAB).
3. HORIZONTAL PIPING WAS PLACED PER THE LAYOUT ON FIGURE 5 AND SUPPORTED BY PLACING AGGREGATE AROUND THE PIPE. PIPE PERFORATIONS WERE POSITIONED IN THE DOWNWARD DIRECTION TO AID IN DRAINAGE.
4. ALL NON-PERFORATED HORIZONTAL PIPING THAT IS CONNECTED TO THE SOIL-GAS COLLECTORS WAS SLOPED 3/8-INCH PER FOOT SO AS TO DRAIN INTO THE PERFORATED SOIL-GAS COLLECTORS.
5. STEEL SLEEVES WERE INSTALLED THROUGH THE FOUNDATION PER THE STRUCTURAL ENGINEER'S SPECIFICATIONS.
6. THE VAPOR BARRIER MEMBRANE WAS PLACED OVER THE GAS PERMEABLE LAYER.
7. PLUMBING AND ELECTRICAL CONDUITS BELOW GRADE WERE SOLVENT-WELDED.
8. PENETRATIONS THROUGH THE SLAB-ON-GRADE WERE SEALED USING POLYURETHANE CAULK.
9. CRACKS WERE SEALED USING POLYURETHANE CAULK.
10. VERTICAL EXHAUST PIPING (IF INSTALLED) WILL BE SECURED WITH BRACKETS EVERY 10 FEET.
11. TOP OF VERTICAL EXHAUST STACK SHALL BE MINIMUM 1.5' FEET ABOVE FINISHED ROOF AND BE 10' AWAY FROM ANY AIR INTAKE AND WINDOWS (IF INSTALLED).
12. WIRE MESH SHALL BE PLACED ON TOP OF THE EXHAUST STACK (IF INSTALLED) TO PREVENT DEBRIS OR SMALL ANIMALS FROM ENTERING THE EXHAUST PIPING.



GAS PERMEABLE LAYER CROSS-SECTION
NTS



GAS PERMEABLE LAYER CROSS-SECTION
NTS

NOTES:

1. THE CONCRETE SLAB IS 4" THICK IN THE OFFICE AREA; AND AT LEAST 6" THICK IN THE MANUFACTURING AREA.

DATE: NOVEMBER 2020
DRAFTED BY: RFL

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0599

JOB NO.: 0489-019-001

VAPOR BARRIER & SUB-SLAB RADON MITIGATION DETAILS

FINAL ENGINEERING REPORT

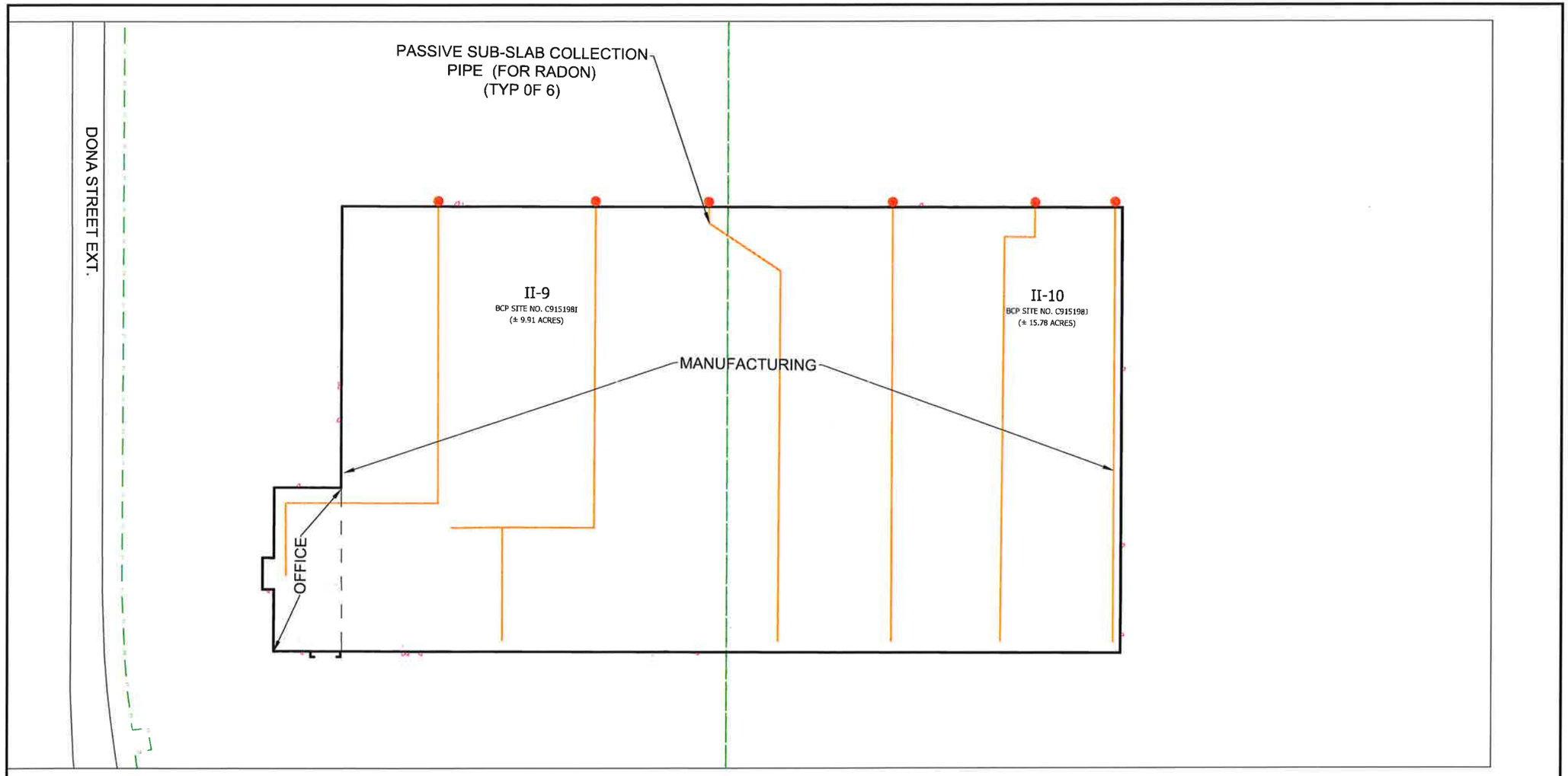
TECUMSEH PHASE II BUSINESS PARK
BCP SITE NOS. C915198I (II-9) & C915189J (II-10)
LACKAWANNA, NEW YORK

PREPARED FOR

TIME RELEASE PROPERTIES, LLC

FIGURE 8

F:\CAD\Benchmark\TMP\FER\Figure 7, Radon Mit System Plan.dwg, 12/16/2020 1:19:04 PM



100' 0' 100' 200'

SCALE: 1 INCH = 100 FEET
SCALE IN FEET
(approximate)

STATE OF NEW YORK
THOMAS H. FORBES
No. 70950-1
LICENSED PROFESSIONAL ENGINEER

LEGEND:

- BCP SITE BOUNDARY
- SUB-SLAB DEPRESSURIZATION VERTICAL EXHAUST PIPE LOCATION, IF DEEMED NECESSARY.
- SUB-SLAB DEPRESSURIZATION HORIZONTAL PIPE LOCATIONS
- TRP BUILDING OUTER WALL

DATE: NOVEMBER 2020
DRAFTED BY: RFL

SUB-SLAB RADON MITIGATION SYSTEM

FINAL ENGINEERING REPORT
TECUMSEH PHASE II BUSINESS PARK
BCP SITE NOS. C915198I (II-9) & C915198J (II-10)
LACKAWANNA, NEW YORK
PREPARED FOR
TIME RELEASE PROPERTIES, LLC

FIGURE 7

BENCHMARK ENVIRONMENTAL ENGINEERING & SCIENCE, PLLC
2558 HAMBURG TURNPIKE
SUITE 300
BUFFALO, NY 14218
(716) 856-0599

JOB NO.: 0489-019-001

ATTACHMENT 2

THE NATIONAL RADON SAFETY BOARD

Certified Radon Professionals

Certifies that

Richard F. Pezzino

Has Successfully Met The Established & Published Requirements for Certification
by The National Radon Safety Board as a

Radon Measurement Specialist

1SS0032

Certification Number

7/30/2021

Expiration Date

National Radon Safety Board
NRSB

Kehaulani Kekoa

Certification Coordinator

National Radon Safety Board
NRSB
Certified Radon Professionals

This certificate is the property of The National Radon Safety Board and is not official without the raised seal.