

February 16, 2023

Megan Kuczka, DER Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
700 Delaware Avenue
Buffalo, New York 14209

Re: **Follow-up Indoor Air Assessment**
Site Management Plan, Post-Installation Monitoring & Inspection
MOD-PAC CORP. Site, 1801 Elmwood Avenue, Buffalo, New York

Dear Ms. Kuczka:

Following discussions with representatives of the New York State Department of Environmental Conservation (NYSDEC), New York State Department of Health (NYSDOH), and Matrix Environmental Technologies, Inc. (METI), it was determined that the monthly collection of vacuum readings for any vapor monitoring point (VMP) that failed to achieve the minimum negative pressure of at least 0.002 inches water column (WC) during quarterly SSD inspections was warranted. At the request of the Department in its September 7, 2022 Periodic Review Report (PRR) Response Letter, monthly VMP monitoring was commenced in October 2022, and will continue through March 2023. After that, such monthly readings will continue until each affected VMP meets the minimum negative pressure as designed. The collection of these monthly readings is assisting with the evaluation of the potential seasonal correlation between maintaining a negative pressure in the sub-slab from operating the SSD Systems and the groundwater surface elevation on-site in the immediate vicinity of the buildings containing the SSDs.

In the September 7, 2022 PRR Response Letter, the NYSDEC requested that indoor and outdoor air sampling be completed during the 2022-2023 heating season if the SSD Systems continued to fail to achieve the minimum 0.002" of WC as designed (with the exception of VMP-6A¹ which is considered inactive). Non-compliant vacuum readings have continued at VMP-8A and VMP-5B during November and December 2022, and January 2023. In that regard, the following monitoring plan is proposed:

1. An Indoor Air Assessment will be completed in Area A - Finished Product Storage Area and Area B - Roll Storage Area (Formerly Cold Storage Area) at the MOD-PAC CORP (MPC) facility. Sample container placement will be

¹ VMP-6A has been verified as a dead point, as described in Section 5.1 – 'Area A Testing' of METI's "System Start-up Report and Operation and Maintenance Plan"¹ as provided within Appendix H – Operation and Maintenance Manual of the SMP. VMP-6A always exhibits positive pressure readings.



focused on the VMP-8A, VMP-5B, and VMP-6B locations, although facility operations must be taken into consideration when selecting these locations in the field. One (1) sample canister will be placed in Area A, one (1) in Area B, and one (1) will be placed outside between these two buildings to collect an outdoor air sample as per the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York², as amended.

2. At the request of the Department, one (1) additional sample canister will be placed in Area A in the area known as the “dead zone” surrounding VMP-6A. This area was determined to have zero vacuum influence due to a subsurface vault in fall of 2019 as described in the System Start-up Report.
3. Samples will be collected in laboratory-supplied Summa Canisters and submitted to an NYSDOH Environmental Laboratory Accreditation Program (ELAP) certified environmental laboratory for analysis of volatile organic compounds (VOCs) via Environmental Protection Agency (EPA) Air Method, Toxic Organics – 15 (TO-15).
4. Results of the air sampling will be compared to Table 3.1: Air guideline values derived by the NYSDOH (as amended) and Table C2, USEPA 2001: Building Assessment and Survey Evaluation (BASE) Database as incorporated into Appendix C of the NYSDOH guidance document.
5. Prior to sample collection, a building survey will be completed in sampling areas as the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York, as amended indicates. A Data Usability Summary Report (DUSR) will be prepared on the laboratory sample results.
6. Pending compliant results it appears that there will be no need for further action regarding these specific VMPs as the other extraction wells (EWs) throughout Area A and Area B will be effectively mitigating any potential for vapor intrusion.

Please Note: All recorded non-compliant readings in Area C - Maintenance Area, have been directly associated with the one or two fans being down for repair or replacement. Pending either fan replacement or the installation of new equipment in Area C, an Indoor Air Assessment will be completed as part of the start-up and verification process. Currently, there is a 12-14 week backlog on receiving such equipment; therefore, any air sampling in Area C is unlikely to be completed by the end of the 2022-2023 heating season.

Attached is a process, instrumentation, and design (PI&D) diagram of the SSD systems illustrating the E’s, VMPs, and radius of influence (ROI) for each area. The previous 2020 SSDS start-up verification sample locations and the proposed 2022-2023

² “Guidance for Evaluating Soil Vapor Intrusion in New York State” prepared by NYSDOH, October 2006, updated May 2017.

heating season sample locations are depicted on the diagram along with the dates of non-compliant vacuum readings per VMP. The indoor air assessment will commence within 10 working days of agency approval.

If you have any questions regarding this information presented above, please contact me directly for further information.

Very truly yours,
ENVIRONMENTAL ADVANTAGE, INC.



C. Mark Hanna, CHMM
President

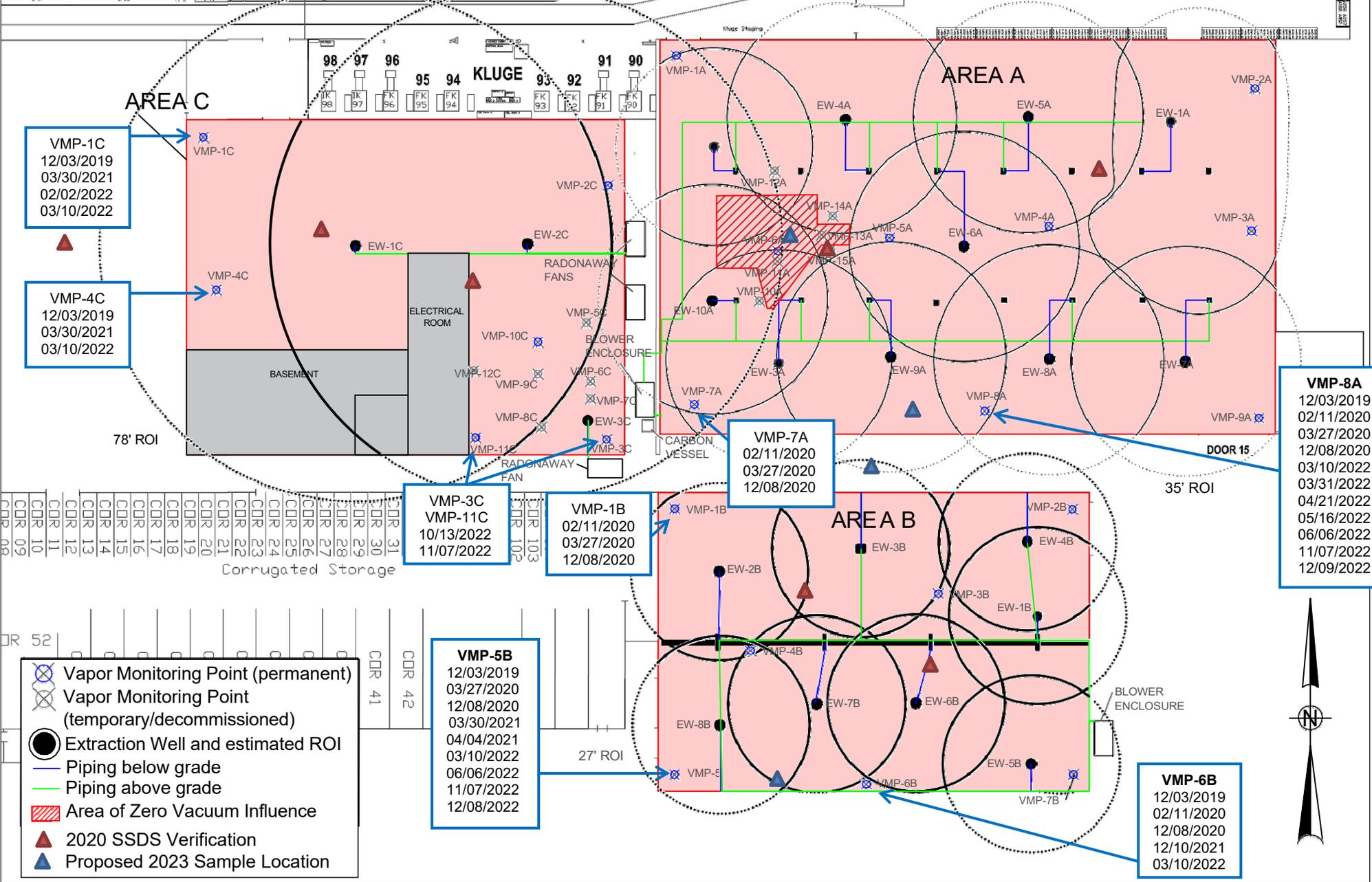
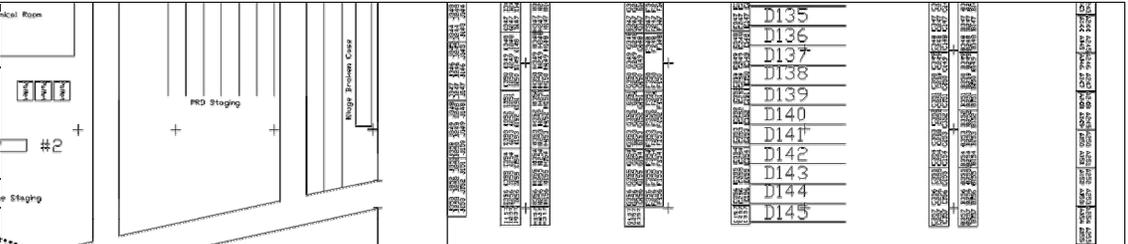
ATTACHMENT A

Figure

ENVIRONMENTAL ADVANTAGE, INC.
Phase I/II Audits – Site Investigations – Facility Inspections

Vapor Mitigation Areas
MOD-PAC, CORP.
 1801 ELMWOOD AVENUE
 BUFFALO, NEW YORK

DRAWN BY: MS	SCALE: NOT TO SCALE	PROJECT: 01304
CHECKED BY: CMH	DATE: 02/2023	FIGURE NO: 1



VMP-1C
 12/03/2019
 03/30/2021
 02/02/2022
 03/10/2022

VMP-4C
 12/03/2019
 03/30/2021
 03/10/2022

VMP-3C
VMP-11C
 10/13/2022
 11/07/2022

VMP-1B
 02/11/2020
 03/27/2020
 12/08/2020

VMP-5B
 12/03/2019
 03/27/2020
 12/08/2020
 03/30/2021
 04/04/2021
 03/10/2022
 06/06/2022
 11/07/2022
 12/08/2022

VMP-7A
 02/11/2020
 03/27/2020
 12/08/2020

VMP-8A
 12/03/2019
 02/11/2020
 03/27/2020
 12/08/2020
 03/10/2022
 03/31/2022
 04/21/2022
 05/16/2022
 06/06/2022
 11/07/2022
 12/09/2022

VMP-6B
 12/03/2019
 02/11/2020
 12/08/2020
 12/10/2021
 03/10/2022

- Vapor Monitoring Point (permanent)
- Vapor Monitoring Point (temporary/decommissioned)
- Extraction Well and estimated ROI
- Piping below grade
- Piping above grade
- Area of Zero Vacuum Influence
- 2020 SSDS Verification
- Proposed 2023 Sample Location