

November 7, 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 – Area C**  
Site Management Plan, Post-Installation Monitoring & Inspection  
MOD-PAC CORP. Site, 1801 Elmwood Avenue, Buffalo, New York

Dear Ms. Kuczka:

As detailed in the previous Periodic Review Reports (PRR's) for the MOD-PAC CORP (MPC) facility, multiple attempts have been made to prevent groundwater from entering into the piping network of the sub-slab depressurization (SSD) system and damaging the RadonAway fans in what is known as "Area C" at the MPC facility. As a result of continued fan malfunction, Matrix Environmental Technologies, Inc. (METI) recommended that the EW-1C and EW-2C fans be replaced with a 1.5 HP blower as described in the 2022-2023 PRR<sup>1</sup>. The blower was installed in August 2023. To that regard, the following monitoring plan is proposed:

1. An Indoor Air Assessment will be completed in Area C – Maintenance at the MPC facility. The sample container will be placed in between the initial February 2020 SSD system verification sample locations, although facility operations must be taken into consideration when selecting these locations in the field. One (1) sample canister will be placed inside the building in Area C and one (1) will be placed outside adjacent to the building to collect an outdoor air sample as per the New York State Department of Health (NYSDOH) Guidance for Evaluating Soil Vapor Intrusion in the State of New York<sup>2</sup>, as amended.
2. Prior to sample collection, pressure readings will be collected from each of the vapor monitoring points in Area C to verify the SSD system is running effectively, and 0.002 inches of water column is being achieved.

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<sup>1</sup> "Periodic Review Report – April 2022 – 2023 Revised; DEC Site #C915314, MOD-PAC Site, 1801 Elmwood Avenue, Buffalo, New York", prepared by Environmental Advantage, Inc., dated June 12, 2023, Revised August 17, 2023.

<sup>2</sup> "Guidance for Evaluating Soil Vapor Intrusion in New York State" prepared by NYSDOH, October 2006, updated May 2017.



3. Samples will be collected in laboratory-supplied Summa Canisters over an 8-hour period 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. The ELAP Laboratory will be requested to report the following compounds at or below the following detection limits: Trichloroethene (TCE), cis-1,2-Dichloroethene (c12-DCE), 1,1-Dichloroethene (11-DCE), Carbon Tetrachloride (CT), and Vinyl Chloride (VC) at 0.25 micrograms per cubic meter (0.25 mcg/m<sup>3</sup>); and all other NYSDOH Matrix compounds at 1 mcg/m<sup>3</sup>.
5. Results of the air sampling will be compared to NYSDOH Soil Vapor Intrusion (SVI) guidance document, specifically Table 3.1: Air guideline values derived by the NYSDOH (as amended), Soil Vapor/Indoor Air Matrix A, Soil Vapor/Indoor Air Matrix B, Soil Vapor/Indoor Air Matrix C, and Table C2, USEPA 2001: Building Assessment and Survey Evaluation (BASE) Database as incorporated into Appendix C of the NYSDOH guidance document.
6. 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.

Attached is a process, instrumentation, and design (PI&D) diagram of the SSD systems illustrating the EW's, VMPs, and radius of influence (ROI) for each area. The previous 2020 SSDS start-up verification sample locations and the proposed December 2023 sample locations are depicted on the diagram. The indoor air assessment will commence prior to the end of December 2023, pending 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

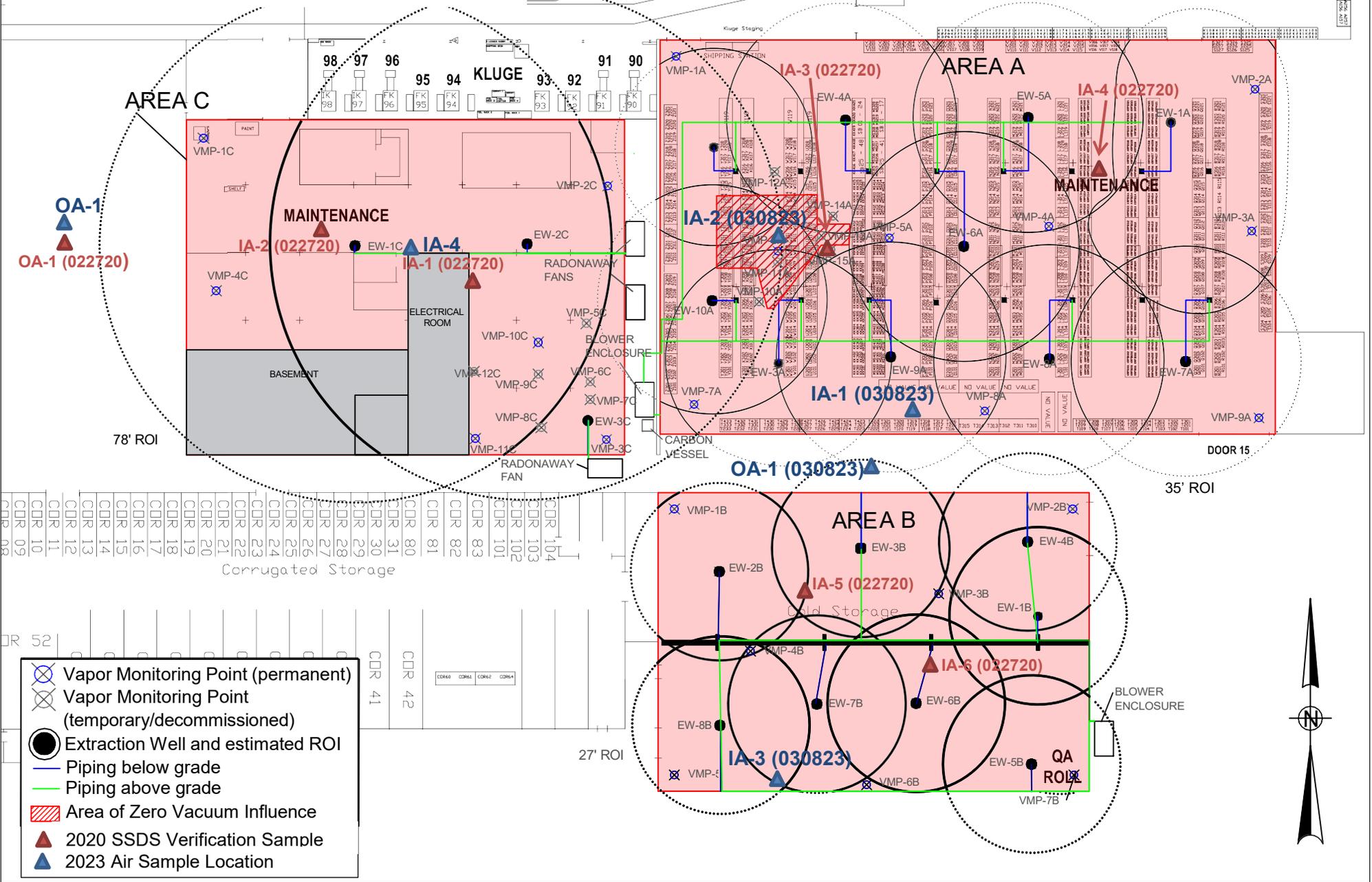
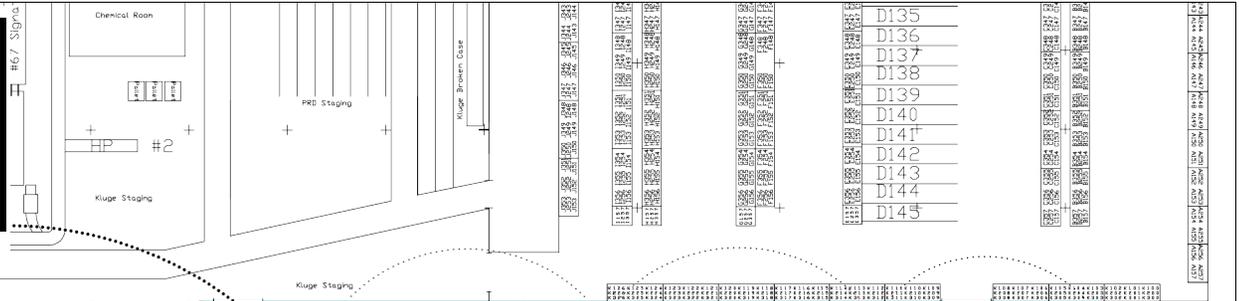
## **ATTACHMENT A**

Figure

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

**PROPOSED AREA C AIR SAMPLING LOCATIONS**  
 1801 ELMWOOD AVENUE  
 BUFFALO, NEW YORK

DRAWN BY: MS	SCALE: NOT TO SCALE	PROJECT: 01304
CHECKED BY: CMH	DATE: 10/2023	FIGURE NO:



- 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 Sample
- 2023 Air Sample Location