MATRIX
ENVIRONMENTAL TECHNOLOGIES INC.
Remediation, Water Treatment and Environmental Engineering
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March 19, 2025

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[1]. 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 during non-production time. 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[2], as amended.

2. Prior to sample collection, vacuum readings will be collected from each of the extraction wells and blower in Area C to verify the SSD system is running effectively. Pressure readings will not be collected from the vapor monitoring points (VMPs) due to potential sample interference.

[1] "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.
[2] "Guidance for Evaluating Soil Vapor Intrusion in New York State" prepared by NYSDOH, October 2006, updated February 2024.

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^3); and all other NYSDOH Matrix compounds at 1 mcg/m^3.

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, Soil Vapor/Indoor Air Matrix D, Soil Vapor/Indoor Air Matrix E, Soil Vapor/Indoor Air Matrix F, 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 March 2025 sample locations are depicted on the diagram. The indoor air assessment will commence prior to the end of March 2025, pending agency approval.

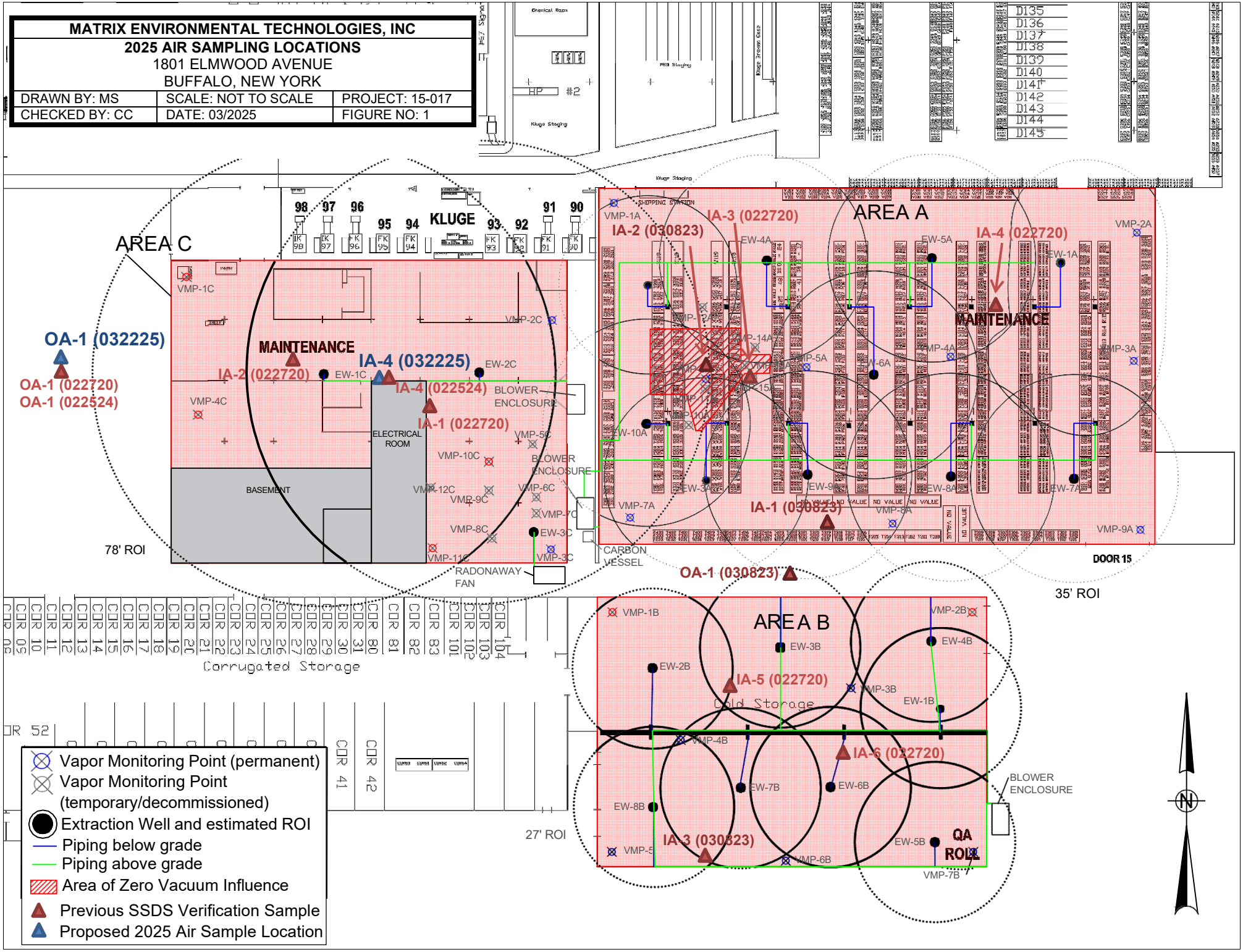
If you have any questions regarding this information presented above, please contact me directly for further information.

Very truly yours,
MATRIX ENVIRONMENTAL TECHNOLOGIES, INC.

Mary Szustak
Project Manager

ATTACHMENT A

Figure


MATRIX ENVIRONMENTAL TECHNOLOGIES, INC
2025 AIR SAMPLING LOCATIONS
1801 ELMWOOD AVENUE
BUFFALO, NEW YORK
DRAWN BY: MS
SCALE: NOT TO SCALE
PROJECT: 15-017
CHECKED BY: CC
DATE: 03/2025
FIGURE NO: 1
AREA C
AREA A
AREA B
KLUGE
MAINTENANCE
ELECTRICAL ROOM
BASEMENT
BLOWER ENCLOSURE
CARBON VESSEL
RADONAWAY FAN
SHIPPING STATION
DOOR 15
Corrugated Storage
Cold Storage
QA ROLL
OA-1 (032225)
OA-1 (022720)
OA-1 (022524)
IA-1 (022720)
IA-2 (022720)
IA-3 (022720)
IA-4 (032225)
IA-4 (022524)
IA-4 (022720)
OA-1 (030823)
IA-1 (030823)
IA-2 (030823)
IA-5 (022720)
IA-6 (022720)
IA-3 (030823)
78' ROI
35' ROI
27' ROI
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
Previous SSDS Verification Sample
Proposed 2025 Air Sample Location
N