

November 15, 2019

Mr. Chad Staniszewski, P.E.
Regional Engineer
NYSDEC Region 9
270 Michigan Avenue
Buffalo, New York 14203

Re: Concrete-Slab Sampling Work Plan for Areas Formerly Containing Oil-filled
Electrical Equipment
Former Trico Plant (BCP Site No. C915281)

Hello Chad:

On November 7th, during a meeting regarding the Former Trico Plant Brownfield Cleanup Program (BCP) Site, the New York State Department of Environmental Conservation (NYSDEC) requested that concrete slab sampling be completed within areas of the building that formerly contained oil-filled electrical equipment. On behalf of 847 Main Street, LLC and 791 Washington Street, LLC, Benchmark Environmental Engineering & Science, PLLC (Benchmark) prepared this letter work plan to present the scope of work to address that request. The attached Figure 1 identifies the locations where the oil-filled electrical equipment were present in the basement of the building and includes the polychlorinated biphenyl (PCB) analytical results of the oil samples collected during characterization for disposal/recycling of the oil and equipment.

Oils present in the electrical equipment have been removed and disposed. The electrical equipment has also been removed, except for seven (7) units present in a room in the southeast corner of the basement. The seven (7) units have been drained of their contents but remain in place suspended above the floor on mounting racks. The results of the seven (7) oil samples collected from these units were all non-detect. These units will be removed through the demolition area once the debris is removed.

Due to the on-going demolition, an area of the basement is not accessible as it is filled with demolition debris. This area is shown on Figure 1. There were three (3) pieces of electrical equipment that were formerly present in this area. These units were all sampled individually and had non-detect results for PCBs. No staining was observed in these areas during the cover system inspections with NYSDCE in August and September 2019. Therefore, this area of former electrical equipment was not included in the sampling proposed below.

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CONCRETE & SOIL SAMPLING

Concrete samples will be collected from areas formerly containing oil-filled electrical equipment. Sampling will be biased towards areas of concrete that appear to be stained/discolored, if present. If no staining or discoloration are present the sample will be collected from within the vicinity of the former equipment. Figure 1 identifies the six (6) areas that are accessible and proposed to be sampled. One (1) concrete sample and one (1) soil sample will be collected from each area except for the area containing former electric equipment identified on Figure 2 as #5, #6, and #7. Two (2) concrete and one (1) soil sample will be collected from this area. Actual locations from within each area will be determined in the field based on observations discussed above. The six (6) sample areas will be photo-documented as well as the location of the concrete sample from within each area.

The concrete samples will be collected using an electric hammer drill and drill bit to drill into the concrete slab in the sample area. The areas will be swept to remove any surface debris prior to drilling. The concrete drill cuttings from the upper 3+/- inches of the concrete slab will be containerized from each sample location to generate the concrete slab sample. The samples will be placed into laboratory provided jars and sent to the laboratory for PCB analysis via EPA Method 8082.

After the concrete slab sample is collected, a concrete core machine with a 6-inch diameter core barrel will be used to core the concrete in the area of the initial sample. The concrete core will be retained. A stainless-steel hand auger will be used to collect a soil sample from 6 -inches below the concrete slab through the core, if soil is present below the slab. The soil sample will be placed into laboratory provided jars, sent to the laboratory, and analyzed for PCBs via EPA Method 8082.


INVESTIGATION FINDINGS

The analytical results will be tabularized and provided to the NYSDEC with a figure showing the locations of the samples and the photo-documentation collected from the sample areas. If additional investigation and/or remedial action is necessary, the proposed action(s) will be provided to NYSDEC in writing for review and approval.

We appreciate the Department's attention to the matter as time is of the essence. Please contact us if you have any questions, require additional information, or would like to discuss. We are anxious to implement this scope of work.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC


Christopher Boron, P.G.
Sr. Project Manager


Thomas H. Forbes, P.E.
Principal Engineer

cc: P. Neureuter (Krog Group)
M. McGuigan (Krog Group)

File: 0091-016-001

FIGURE

LEGEND:



PROPOSED SAMPLING AREA (6 AREAS)

1

3 UNITS OF OIL FILLED EQUIPMENT
NON-TSCA

2

1 UNIT OF OIL FILLED ELECTRICAL EQUIPMENT
NON-TSCA

3

15 UNITS OF OIL FILLED EQUIPMENT
NON-TSCA

4

3 UNITS OF OIL FILLED ELECTRICAL EQUIPMENT
2 TSCA AND 1 NON-TSCA

5

3 UNITS OF OIL FILLED EQUIPMENT
NON-TSCA

6

6 UNITS OF OIL FILLED ELECTRICAL EQUIPMENT
NON-TSCA

7

10 UNITS OF OIL FILLED ELECTRICAL EQUIPMENT
TSCA WASTE

8

2 UNITS OF OIL FILLED ELECTRICAL EQUIPMENT
NON-TSCA

9

1 UNIT OF OIL FILLED ELECTRICAL EQUIPMENT
NON-TSCA

10

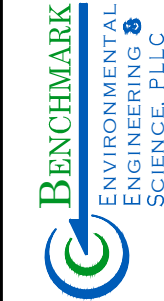
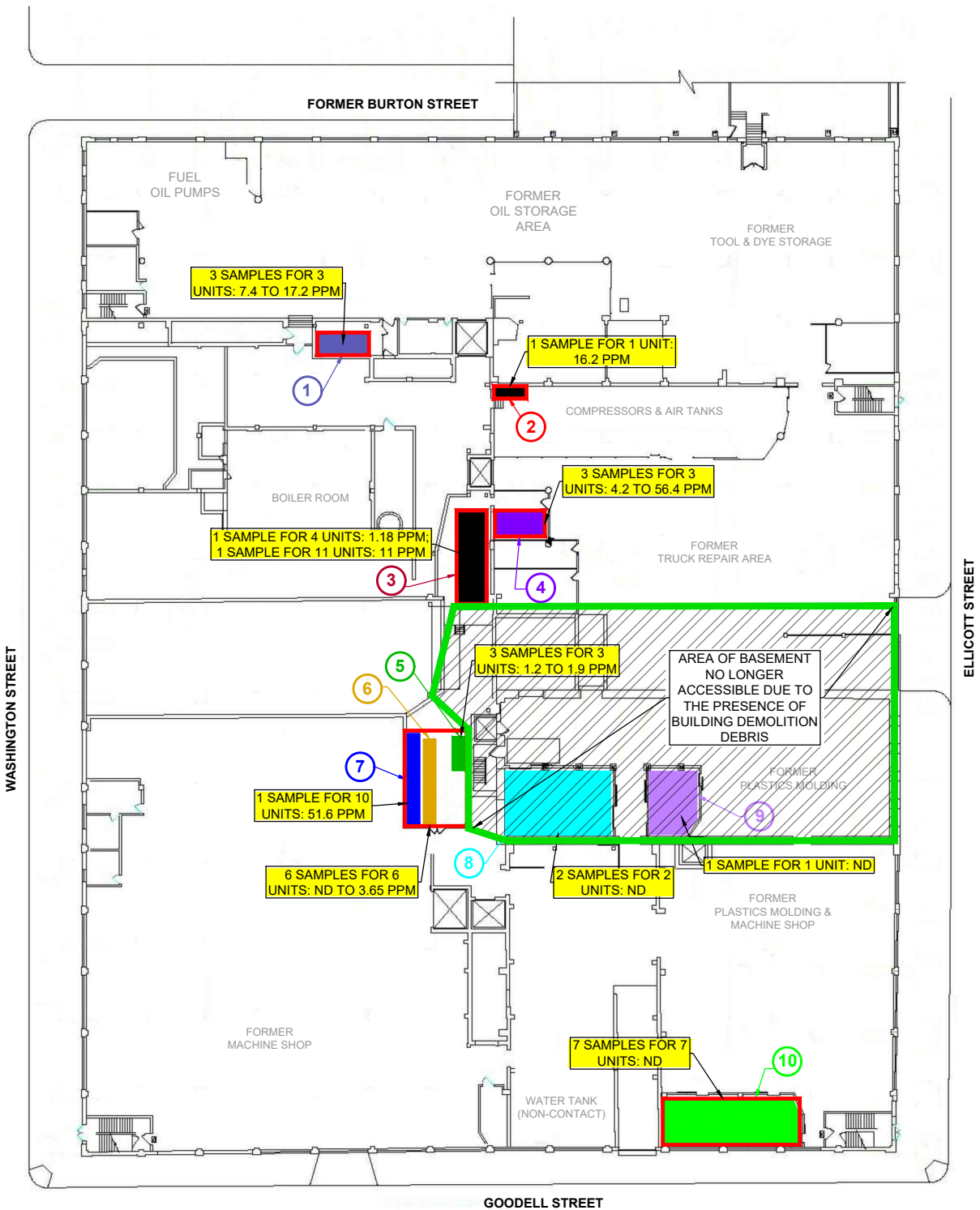
7 UNITS OF OIL FILLED ELECTRICAL EQUIPMENT
NON-TSCA

7 SAMPLES
FOR 7 UNITS:
ND

OIL SAMPLES FROM EQUIPMENT; RESULTS REFLECT
POLYCHLORINATED BIPHENYLS (PCB) CONCENTRATION IN
PARTS PER MILLION (PPM). ND = NOT DETECTED.



SCALE: 1 INCH = 50 FEET
SCALE IN FEET
(approximate)



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LOCATIONS OF OIL FILLED ELECTRICAL EQUIPMENT

CONCRETE SAMPLING WORK PLAN

FORMER TRICO PLANT

791 WASHINGTON STREET

BUFFALO, NEW YORK

PREPARED FOR

847 MAIN STREET, LLC & 791 WASHINGTON STREET, LLC

JOB NO.: 0092-016-001

FIGURE 1

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