BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

November 18, 2019

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

Re: Loading Dock Concrete & Soil Sampling Work Plan
Former Trico Plant (BCP Site No. C915281)

Dear Mr. Staniszewski:

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 delineate and remove the extent of polychlorinated biphenyl (PCB)-impacted concrete discovered in the floor of the loading dock area at the Former Trico Plant building, located at 791 Washington Street, Buffalo, New York (Site, see Figure 1). The loading dock area is located inside the building; the approximate location of the dock is shown on Figure 2.

The loading dock area is bound to the east by the dock platform, which is at the same elevation as the 1st floor of the building and is 4+/- feet higher in grade than the loading dock floor; and to the north by the former upper Boiler Room walls. Access to the loading dock area is from the west along Washington Street through a large overhead door.

The concentrations of PCBs detected in the loading dock floor exceed 50 microgram per kilogram (mg/kg) at certain locations, requiring corrective actions. The cause of the PCB impacts is unknown but based upon the concentrations detected it is suspected that they are attributable to a historic release to the dock floor. Due to time constraints under the NY State Brownfield Cleanup Program (BCP), 847 Main Street, LLC and 791 Washington Street, LLC have elected to address the affected concrete floor and any underlying impacted soils under a performance-based disposal approach pursuant to 40 CFR 761.61(b). This will involve delineating the extent of PCB-impacted concrete and underlying soil potentially associated with the release to a maximum concentration of 1 mg/kg. Once the extent of the PCB contamination is delineated the concrete slab and underlying soil, if any, exceeding 1 mg/kg will be removed and transported offsite for disposal of at a chemical waste landfill approved under 40 CFR 761.75 (i.e., approved Subtitle C landfill permitted to accept PCB remediation waste).

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phone: (716) 856-0599 | fax: (716) 856-0583

As discussed during our conference call on November 18, 2019 with the United States Environmental Protection Agency (USEPA), performance-based disposal undertaken in accordance with 40 CFR 761.61(b) does not require USEPA notification or oversight, and the work to delineate and remove the concrete and soil above 1 mg/kg can proceed under the BCP with NYSDEC oversight.

CONCRETE & SOIL SAMPLING

The existing interior column structure of the building will be used as the grid pattern for the delineation sampling. The columns are generally spaced 25 feet apart in the north-south direction and 20 feet in the east-west direction. Each grid is approximately 500 square feet. Within a respective grid, five (5) concrete samples will be collected from the upper 3+/- inches and composited into one (1) grid sample. The grid samples will be identified by the corresponding Letter and Number shown on Figure 3 along the perimeters of Loading Dock area. If soil is present below the concrete slab, one (1) soil grab sample will be collected from the approximate center of the grid area. The dashed green line on Figure 3 differentiates the portion of the loading dock floor and surrounding area to the north that has soil present below the slab vs that which is a suspended concrete slab above the underlying basement to the south of the dashed green line.

The concrete samples will be collected using an electric hammer drill and drill bit to drill into the concrete slab. The drill bits to be used to collect the concrete samples will be marked to identify the 3-inch depth. In order to obtain the appropriate sample volume, the five (5) drill holes will be completed within each grid as shown on Figure 3. The concrete fines will be collected, placed in a stainless-steel bowl, and homogenized using the cone and quartering method. One (1) 4-ounce jar will be sent to the lab from a respective grid area sample location, unless the sample is subject to QA/QC sampling. In that case, the drilling to be completed to collect the parent sample will be repeated at approximate 2-inch offsets for the QA/QC samples as appropriate to obtain the required sample volume. The drill bit and non-dedicated stainless utensils will be decontaminated after each use with a wire brush, alconox and potable water wash, and potable water rinse.

In the loading dock area that has soil present below the slab (northwestern portion), a 4-inch diameter core barrel will be used to core the concrete slab in the approximate center of the grid area. The core will be removed, and a hand auger will be used to collect a soil sample from the upper 6+/- inches of soil present below the slab. The concrete core will be decontaminated after each use with a wire brush, alconox and potable water wash, and potable water rinse.

Figure 3 identifies the first round of composite concrete grid samples and soil samples to be analyzed in the blue hatched area. Once the results of the 1st round of samples are received, additional samples, if needed, will be analyzed to further delineate the PCB concentrations greater than 1 mg/kg. This process of additional sample analysis will be repeated until the extent of PCBs above 1 mg/kg is delineated in consultation with NYSDEC. Additional

concrete grid composite samples and soil samples will be collected in the same manner as the 1st round sample location. Each concrete grid area sample will be a five (5) point composite and the soil sample will be collected from the approximate midpoint of the grid area being sampled.

The concrete cores will be retained and used to prepare the waste characterization samples for concrete slab disposal. If necessary, the soil samples sent to the laboratory will also be used generate waste characterization samples, if soil removal is necessary (concentrations greater than 1 mg/kg). The concrete grid composite samples and soil samples collected will be placed into laboratory provided jars and sent to the laboratory for PCB analysis via EPA Method 8082. The waste characterization samples will be analyzed per the disposal facilities requirements.

DELINEATION FINDINGS

The analytical results will be tabularized with a figure showing the results and areas of concrete and/or soil to be removed to a maximum concentration of 1 mg/kg will be provided to NYSDEC for review and approval. Once the disposal location of the remediation waste is identified this information will be provided to NYSDEC in writing along with the concrete and/or soil removal schedule.

CONCRETE & SOIL REMOVAL

As you are aware, time is of the essence, depending on the size of the area of concrete and soil to be removed, removal actions may begin prior to the complete delineation of the suspect PCB release area.

Base on previous PCB sampling completed, grids A1, A2, A3, B1, B2, B3 and portions of A4, C1 and C2 will needed to be removed. The removal of the concrete will occur by cutting the concrete slab into blocks for removal. The size of the concrete blocks will be based on the requirements of the TSCA landfill to be used to dispose of the waste.

Post-removal soil samples will be collected from under the concrete slab removal area. If the soil samples collected as part of this work plan are below 1 mg/kg, the results will be considered post-removal samples as they will have been collected approximately every 500 square feet.

COVER SYSTEM REPLACEMENT

After the limits of the PCB-impacted concrete are removed and the post-removal soil samples are acceptable (1 mg/kg or less) the cover system in the removal area will be restored with either 2-feet of NYSDEC DER-10 compliant soil/stone or hardscape.

REPORTING

The removal activities, post-removal sampling, disposal manifests, figures, tables, etc. for the 40 CFR 761.61(b) performance-based disposal work will be documented for NYSDEC in the Final Engineering Report to be submitted under the BCP.

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

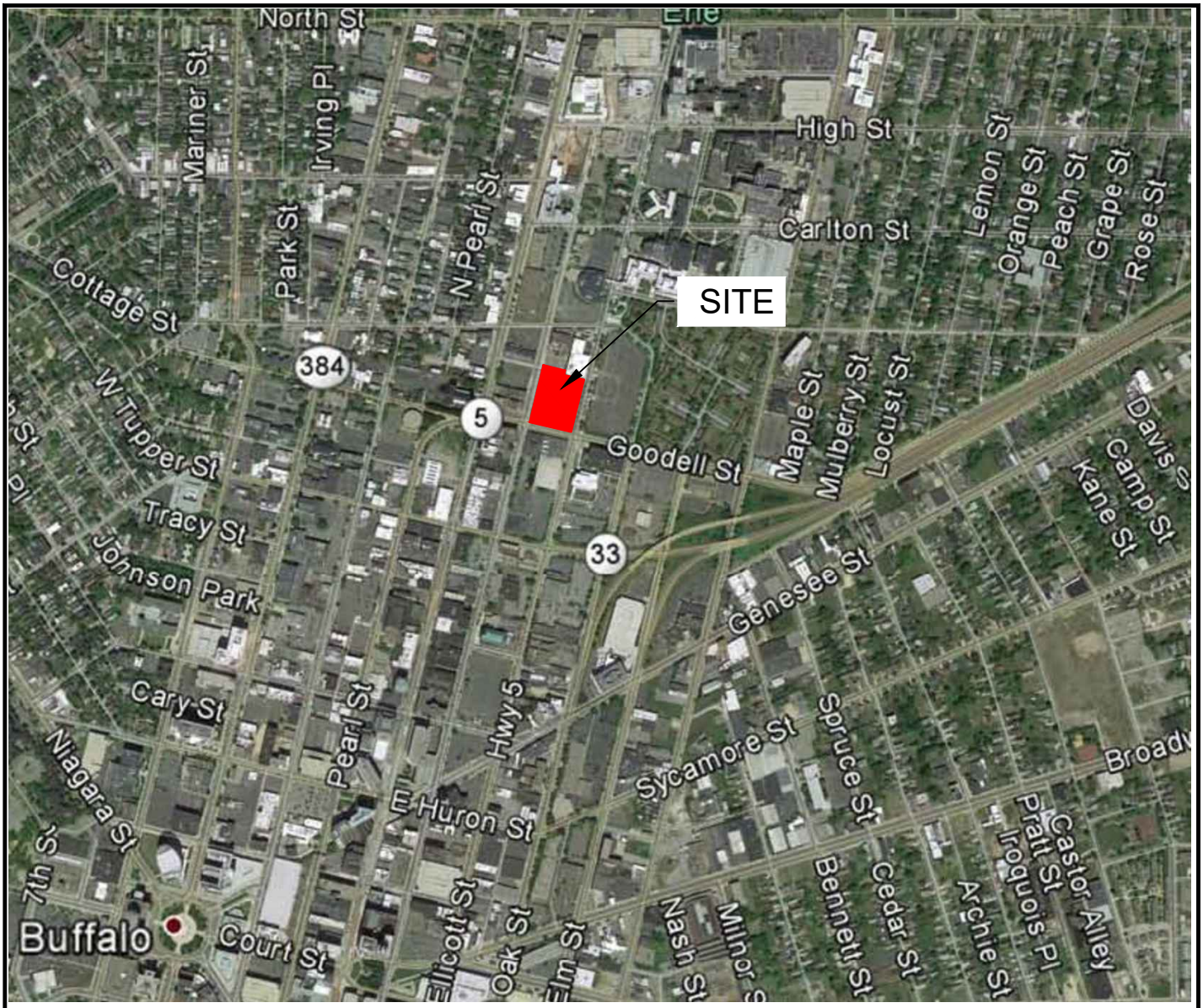
Thomas H. Forbes, P.E.
Principal Engineer

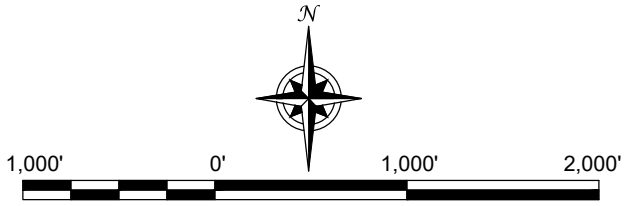
ec: P. Neureuter (Krog Group)
M. McGuigan (Krog Group)

File: 0091-016-001

FIGURE

FIGURE 1





SCALE: 1 INCH = 1,000 FEET
SCALE IN FEET
(approximate)

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

PROJECT NO.: 0092-016-001-009

DATE: NOVEMBER 2019

DRAFTED BY: RFL

SITE LOCATION AND VICINITY MAP

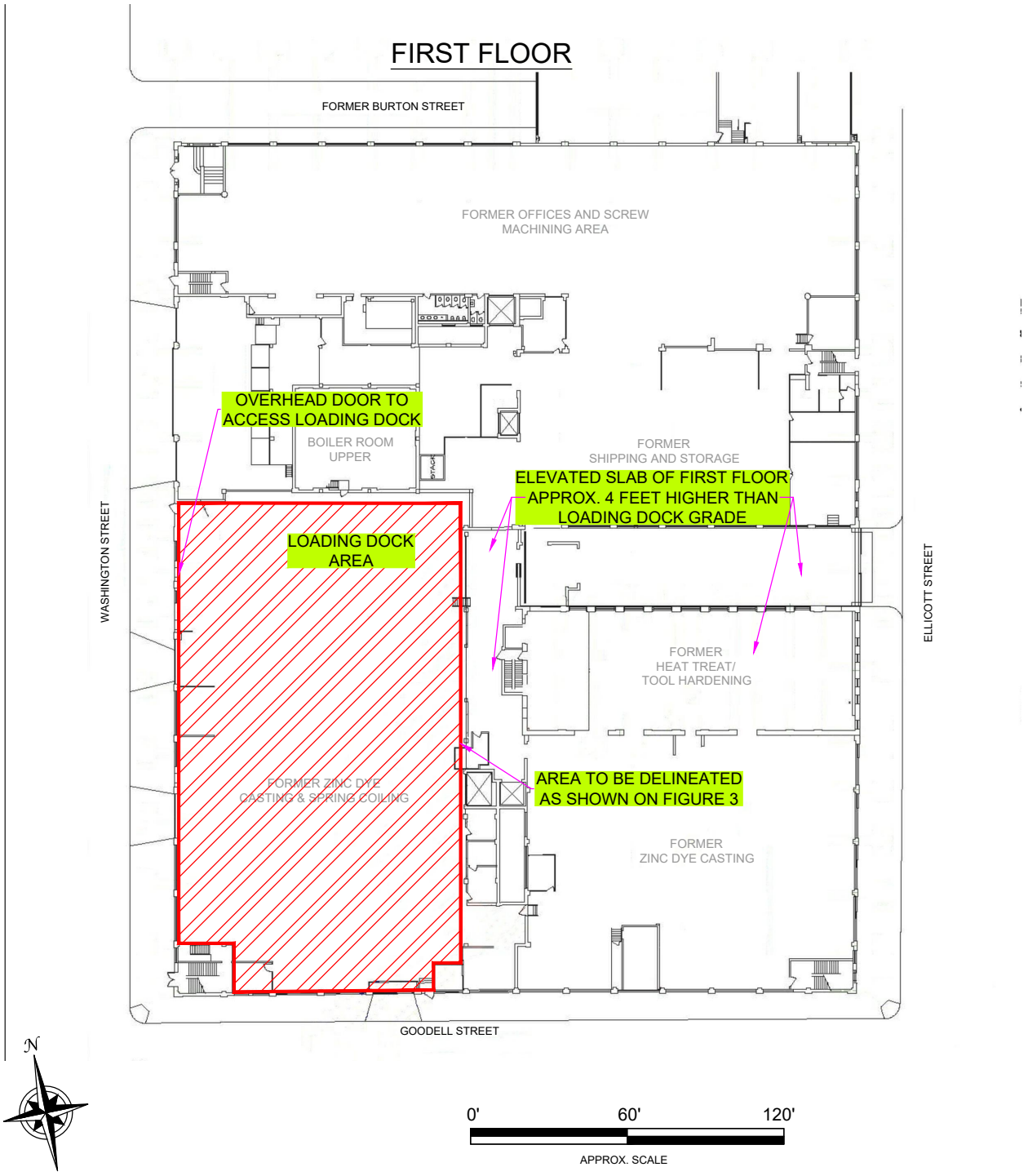
LOADING DOCK CONCRETE & SOIL SAMPLING PLAN

FORMER TRICO PLANT
791 WASHINGTON STREET
BUFFALO, NEW YORK

PREPARED FOR

847 MAIN STREET, LLC AND 791 WASHINGTON STREET, LLC

FIGURE 2



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BUILDING FLOOR PLAN - 1ST FLOOR

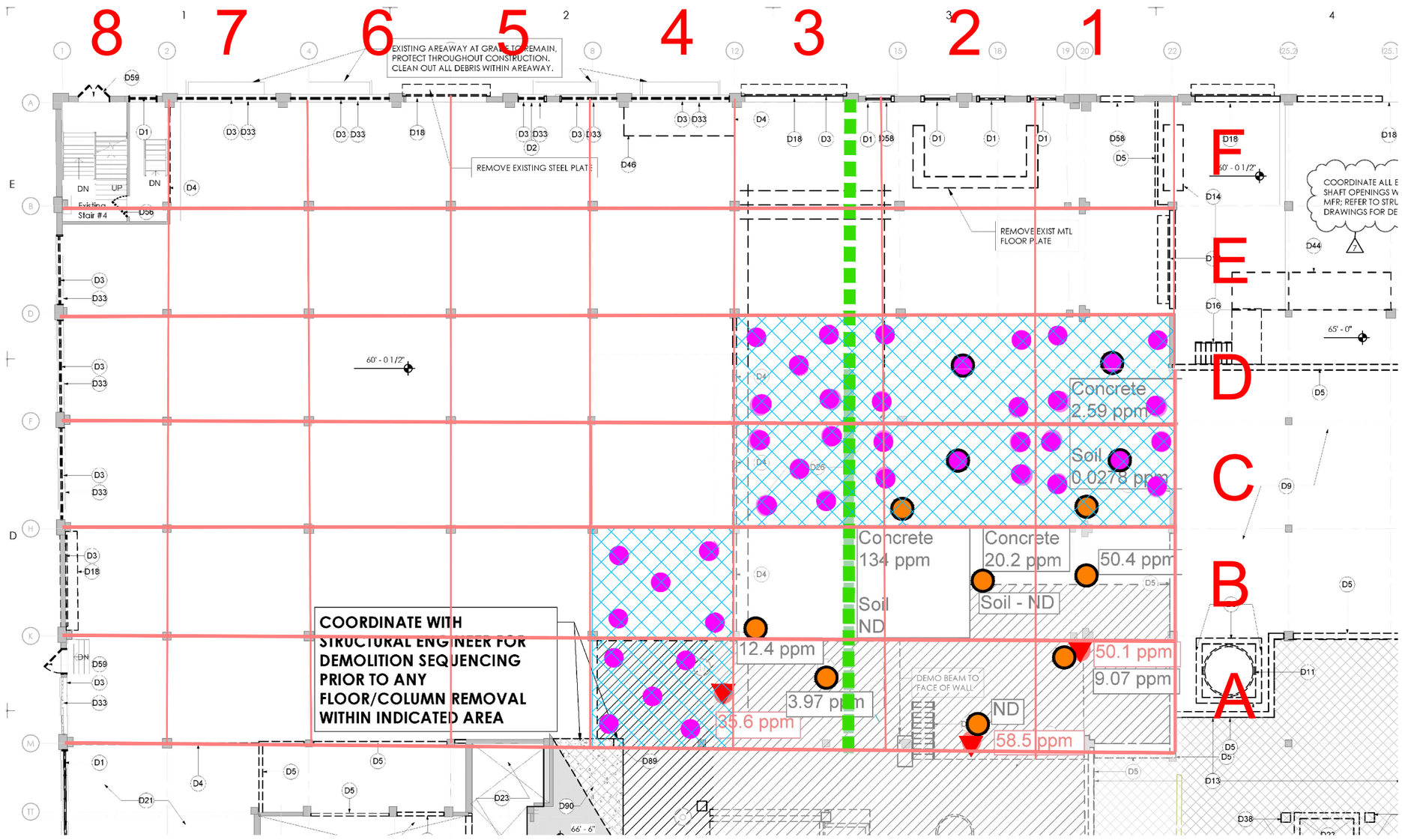
LOADING DOCK CONCRETE & SOIL SAMPLING PLAN

FORMER TRICO PLANT
791 WASHINGTON STREET
BUFFALO, NEW YORK

PREPARED FOR

847 MAIN STREET, LLC & 791 WASHINGTON STREET, LLC

F:\CAD\TurnKey\Krog\Former Trico Building BCP\Loading Dock Work Plan\Figure 2; Building First Floor Plan.dwg, 11/18/2019 4:48:15 PM, DWG To PDF.pc3



SCALE: 1 INCH = 20 FEET
SCALE IN FEET
(approximate)

DATE: NOVEMBER 2019
DRAFTED BY: RFL

LEGEND:

- CONCRETE HAMMER DRILL SAMPLE
- CONCRETE HAMMER DRILL & SOIL SAMPLE LOCATION (WILL REQUIRE CORING)
- PREVIOUS CONCRETE CORE SAMPLE LOCATION
- PREVIOUS CONCRETE DRILL SAMPLE LOCATION
- APPROXIMATE LIMITS OF LOADING DOCK AREA CONTAINING UNERLYING SOIL (NORTH) VS SUSPENDED SLAB OVER BASEMENT (SOUTH)
- FIRST ROUND OF SAMPLES

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JOB NO.: 0092-016-001-009

SAMPLE LOCATION PLAN

LOADING DOCK CONCRETE & SOIL SAMPLING PLAN
FORMER TRICO PLANT
791 WASHINGTON STREET
BUFFALO, NEW YORK
PREPARED FOR
847 MAIN STREET, LLC & 791 WASHINGTON STREET, LLC

FIGURE 3