BENCHMARK
ENVIRONMENTAL
ENGINEERING &
SCIENCE, PLLC

December 11, 2019
Via Electronic- Transmittal

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

Re: Remedial Action Work Plan Addendum
Former Trico Plant, BCP Site C915281

Dear Mr. Staniszewski,

On behalf of 791 Washington Street, LLC and 845 Main Street LLC, Benchmark Environmental Engineering & Science, PLLC (Benchmark) has prepared this Remedial Action Work Plan (RAWP) Addendum to address polychlorinated biphenyl (PCB)-impacted concrete that has been identified at the Former Trico Plant located at 791 Washington Street in Buffalo, New York (Site; see Figure 1). PCBs have been detected in the concrete slab of a former interior loading dock area (see Figures 2 and 3) and within a few former oil-filled electrical equipment areas (EEAs) in the basement of the building (see Figure 4) that will require remedial action under the Brownfield Cleanup Program (BCP).

BACKGROUND

The Site is a 2.11-acre single parcel in the City of Buffalo. The Site building consists of a complex of five (5) former industrial buildings totaling approximately 617,600 square feet with a building footprint of approximately 84,000 square feet. Except for the Former Burton Street area, north of the building, the entire Site is covered by the building footprint (see Figure 2).

During an evaluation of building material reuse (concrete and brick) to be removed as part of the Site redevelopment plan, PCBs above 50 micrograms per kilogram (mg/kg) were identified in a former interior loading dock area (see Figure 3). Subsequent sampling[1] completed in the former loading dock area indicated that PCBs above 1 mg/kg were present throughout the majority of the area with concentrations ranging from non-detect to 484 mg/kg. The area of the loading dock with underlying soil is considered a component of the Site cover system under the BCP. Remedial actions will be taken to address PCB concentrations greater than 1 mg/kg, as discussed later in this RAWP Addendum.

[1] "Loading Dock Concrete & Soil Sampling Work Plan, Former Trico Plant (BCP Site No. C915281)" dated November 18, 2019,

NYSDEC also requested concrete and soil sampling in former EEAs present in the basement of the Site building (see Figure 4) as the basement concrete slab sits over underlying soil and is a component of the cover system. These EEAs contained equipment with both Toxic Substance Control Act (TSCA)-regulated and non-TSCA regulated dielectric fluids which have been removed and properly disposed (oils and equipment housings). Figure 4 identifies those areas along with the concentrations of the concrete and soil samples collected from those areas. The investigation activities were completed in accordance with a NYSDEC-approved work plan[2].

The concrete sample results indicated that four (4) of the six (6) EEAs (2, 3, 4, and 5) sampled had PCB concentrations in concrete greater than 1 mg/kg. The soil samples collected as part of the EEA assessment did not indicate concentrations greater than 1mg/kg. The remedial actions associated with the EEAs are discussed later in this RAWP Addendum.

REMEDIAL APPROACH

Loading Dock Area

Although the source of the loading dock area impacts is unknown, the presence of PCB impacts greater than 50 mg/kg indicates a historic release of TSCA-regulated substance. Under the performance-based disposal approach pursuant to the TSCA regulation (40 CFR 761.61(b)), PCB-impacted concrete and underlying soil with concentrations greater than 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).

Based on the concrete sampling completed, the grid areas shown on Figure 3, the concrete within the grid areas shown in blue will be removed and disposed of at US Ecology's TSCA Subtitle C landfill facility in Bellevue, Michigan. Grid areas C1 (0.33 mg/kg) and F1 (non-detect) do not require removal based on the sampling results. However, a decision was made to remove the concrete associated with grid area C1 and dispose of the concrete with the other grid areas to be removed to facilitate the work.

During the concrete removal, soil samples will need to be collected from the following grid areas, as no soil samples were previously collected from these areas: A1, A2, B1, D1 and E1. The other grid locations were previously sampled and have results less than 1 mg/kg (B2, C1, C2, D2, and E2) except for F2. Each sample result represents approximately 500 square feet. The soil sample results that have been obtained are also summarized on Figure 3.

[2] "Concrete-Slab Sampling Work Plan for Areas Formerly Containing Oil-Filled Electrical Equipment, Former Trico Plant (BCP Site No. C915281)" dated November 15, 2019.

The soil sample result from grid area F2 (1.29 mg/kg) was above the 1 mg/kg threshold for performance-based disposal and will be excavated to a depth of approximately 1 foot below the bottom of the former concrete slab (initial soil sample was collected from approximately 0 to 0.5 feet below the concrete). Once the soil is removed, another soil sample will be collected from the F2 grid area. If the results for the sample are below 1 mg/kg, no additional work will be required. If the concentrations are greater than 1 mg/kg, then additional soil will be removed and the grid area resampled. This same process will be used for the samples collected from A1, A2, B1, D1 and E1, which have not been previously sampled.

The removed concrete will be replaced with a 6-inch concrete slab, which will constitute the cover system in this area of the Site

The remedial action associated with the Loading Dock Area will be documented in the Final Engineering Report.

Electrical Equipment Areas

As discussed above and shown on Figure 4, four (4) of the six (6) EEAs had concrete concentration greater than 1 mg/kg. Based on communications with EPA regarding the results and former contents of the electrical equipment in the various areas, the concrete impacts associated with EEA 3 are reasonably attributed to a release from TSCA-regulated oil-filled electrical equipment formerly present in this room and will need to be managed as TSCA remediation waste. The remedial actions for the four (4) EEAs are discussed below.

EEA 2 – The content of the electrical equipment in this area had a PCB concentration of 16 mg/kg (non-TSCA regulated). The PCB concentration in the concrete was 2.44 mg/kg and the soil sample from underneath the concrete was non-detect. The soil in the vicinity of EEA2 does not require remedial action. The concrete in the vicinity of the electrical equipment will be removed and replaced with a new 6-inch concrete slab, which will constitute the cover system in this area of the Site. The area removed will be approximately 15 feet (east-west) by 9 feet (north-south). The concrete will be taken to a Subtitle D sanitary landfill (Modern Disposal in Model City, New York) for disposal.

EEA 3 – The content of the electrical equipment in this area (room with dimensions of approximately 17 feet by 17 feet) had PCB concentration as high as 56.4 mg/kg (TSCA regulated). The PCB concentration in the concrete sample was 18.4 mg/kg and the soil sample from underneath the concrete was 0.013 mg/kg. Because the former equipment in the area is TSCA regulated removal of the concrete will be completed under the performance-based disposal approach similar to that described for the loading dock area. The concrete slab (17 feet by 17 feet) will be completely removed to the limits of the room and taken to US Ecology's TSCA Subtitle C landfill facility. The soil beneath EEA2 does not require remedial action and the results were less than 1 mg/kg. In lieu of concrete

replacement, a 2-foot crushed stone (2-inch crusher run stone) cover system will be placed over a demarcation layer and will constitute the cover system in this area of the Site. Benchmark has submitted a material import request to NYSDEC and received approval from the Department on December 9th to import the material.

EEA 4 – The content of the electrical equipment in this area (room with dimensions of approximately 16 feet (east-west) by 40 feet (north-south)) had PCB concentrations ranging from 1.18 to 11 mg/kg (non-TSCA regulated). The PCB concentration in the concrete sample was 3.39 mg/kg. No soil sample was collected from EEA 4 as the core barrel encountered refusal at 4-inches during assessment. The entire concrete slab of the room will be removed to the limits of the room and taken to a Subtitle D sanitary landfill (Modern Disposal in Model City, New York) for disposal. The soil, if any, present beneath EEA 4 will be sampled after the concrete is removed. The soil sample result will be provided to the Department prior to cover system placement. If it exceeds 1 mg/kg we will seek a determination as to whether the results are suitable for cover placement as this is a non-TSCA regulated area. If the result is less than 1 mg/kg, a 2-foot crushed stone (2-inch crusher run stone) cover system will be placed over a demarcation layer and will constitute the cover system in this area of the Site, in lieu of concrete replacement.

EEA 5 – The content of the electrical equipment in this area (room with an approximate 1,250 square foot area) had PCB concentrations ranging from non-detect to 51.6 mg/kg, a mix of both TSCA and non-TSCA regulated electrical equipment. The PCB concentration in the concrete sample beneath the TSCA regulated equipment was 0.256 mg/kg (west side of room) and the soil sample result was 0.018 mg/kg. A second concrete sample was collected from the east side of EEA 5 where non-TSCA regulated electrical equipment was present. The results of the concrete sample was 3.16 mg/kg. No soil sample was collected from this east side.

Communications from EPA regarding EEA 5 (Attachement1) indicated they would like TSCA regulated electrical equipment removed from this area, which has already been completed.

The entire concrete slab (approximately 1,250 square feet) of this room will be removed to the limits of the room and taken to a Subtitle D sanitary landfill (Modern Disposal in Model City, New York) for disposal. The soil sample collected form the southern portion of this area had a PCB concentration of 0.018 mg/kg. Due to the size of the area, a second soil sample will be collected (1 sample per 900 square feet) from the northern portion of EEA5 after the concrete is removed. The soil sample results will be provided to the Department prior to cover system placement. If it exceeds 1 mg/kg we will seek a determination as to whether the results are suitable for cover placement, as this is a non-TSCA regulated area. If the results are less than 1 mg/kg, a 2-foot crushed stone (2-inch crusher run stone) cover system will be placed over a demarcation layer and will constitute the cover system in this area of the Site, in lieu of concrete replacement.

The remedial actions associated with EEAs 2, 3, 4 and 5 will be documented in the Final Engineering Report.

We appreciate the Department's attention to the matter as time is of the essence. The work associated with this RAWP Addendum needs to be completed as soon as possible. Please contact us if you have any questions, require additional information, or would like to discuss. We are anxious to implement this work plan.

Sincerely,
Benchmark Environmental Engineering & Science, PLLC

Christopher Boron, P.G.
Sr. Project Manager

Thomas H. Forbes, P.E.
Principal Engineer

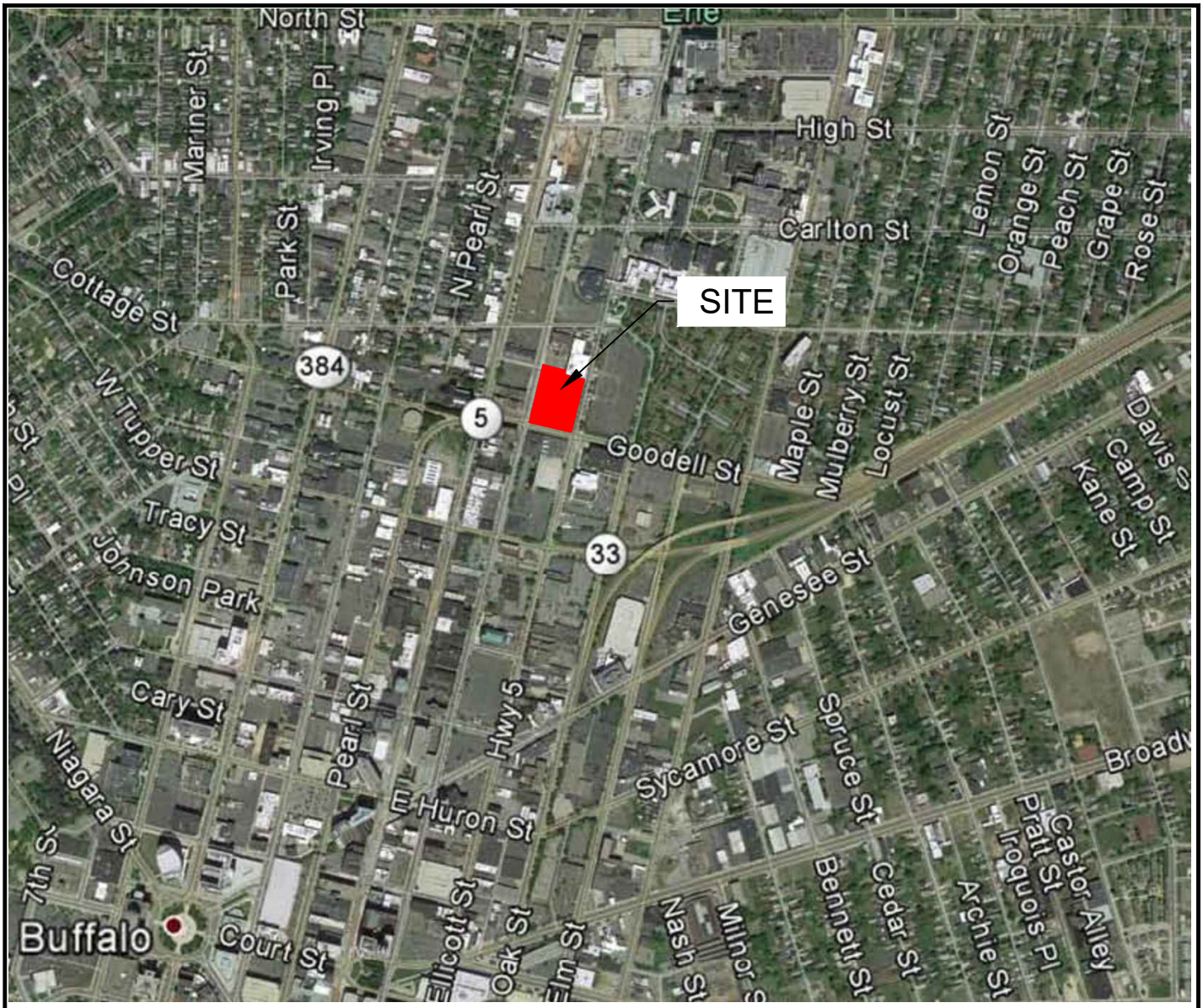
Attachments

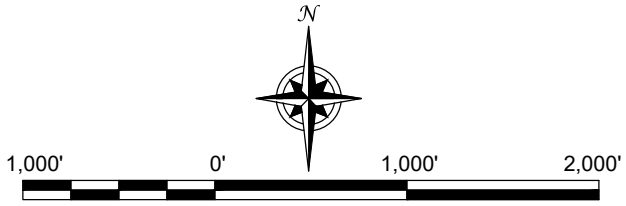
ec: Peter Krog (791 Washington Street, LLC and 845 Main Street LLC)
Paul Neureuter (The Krog Group)

File: 0091-016-001-009

FIGURES

FIGURE 1





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

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TURNKEY ENVIRONMENTAL RESTORATION, LLC
2558 HAMBURG TURNPIKE, SUITE 300, BUFFALO, NY 14218, (716) 856-0599

PROJECT NO.: 0092-016-001

DATE: DECEMBER 2019

DRAFTED BY: RFL

SITE LOCATION AND VICINITY MAP

REMEDIAL ACTION WORK PLAN ADDENDUM

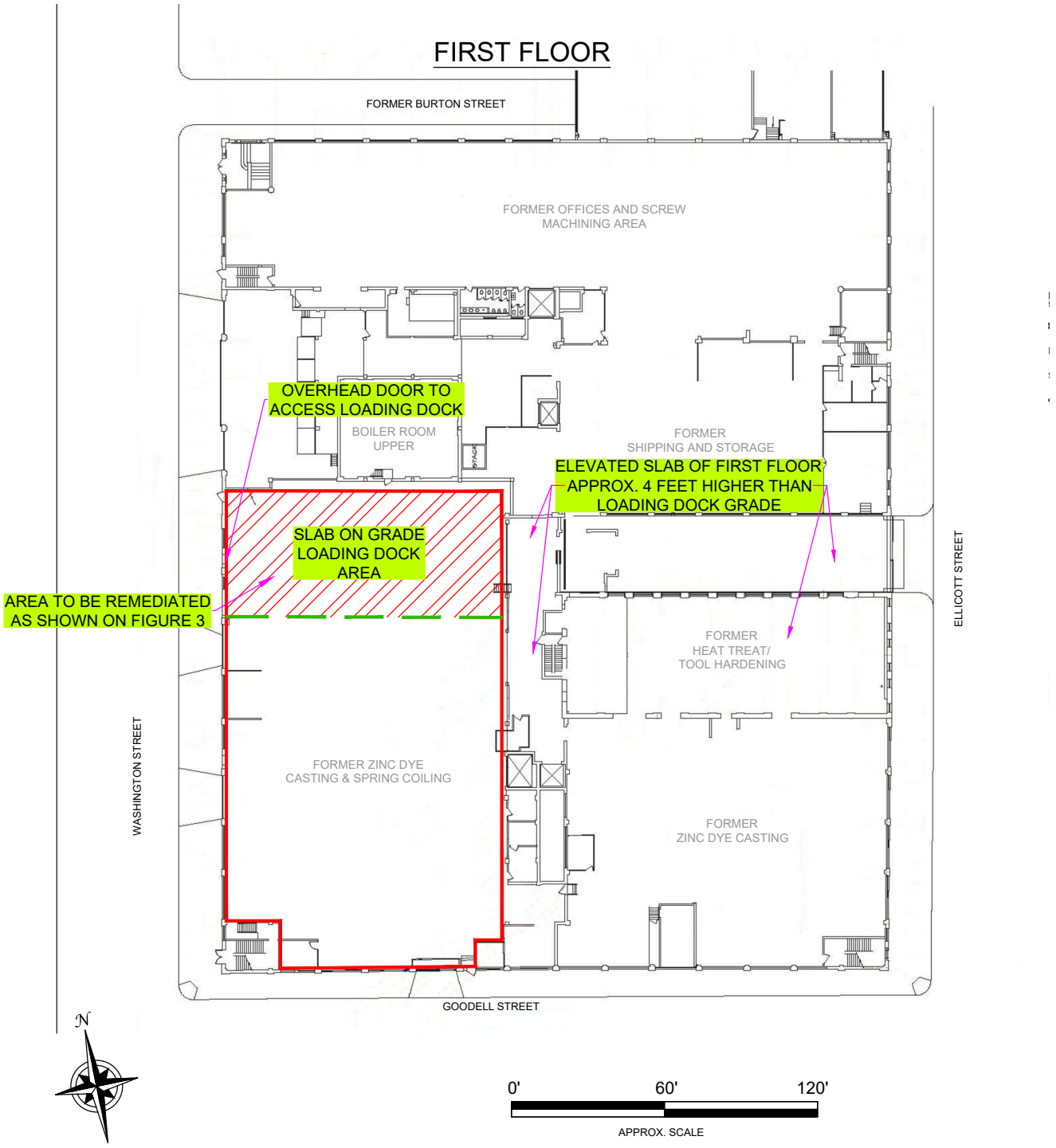
FORMER TRICO PLANT (BCP SITE NO. C915281)
791 WASHINGTON STREET
BUFFALO, NEW YORK

PREPARED FOR

847 MAIN STREET, LLC & 791 WASHINGTON STREET, LLC

F:\CAD\TurnKey\Krog\Former Trico Building BCP\RAWP\Dec 2019 Revisions\Figure 2; Building First Floor Plan.dwg, 12/11/2019 7:44:31 AM

FIGURE 2



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PROJECT NO.: 0092-016-001-009

DATE: DECEMBER 2019

DRAFTED BY: RFL

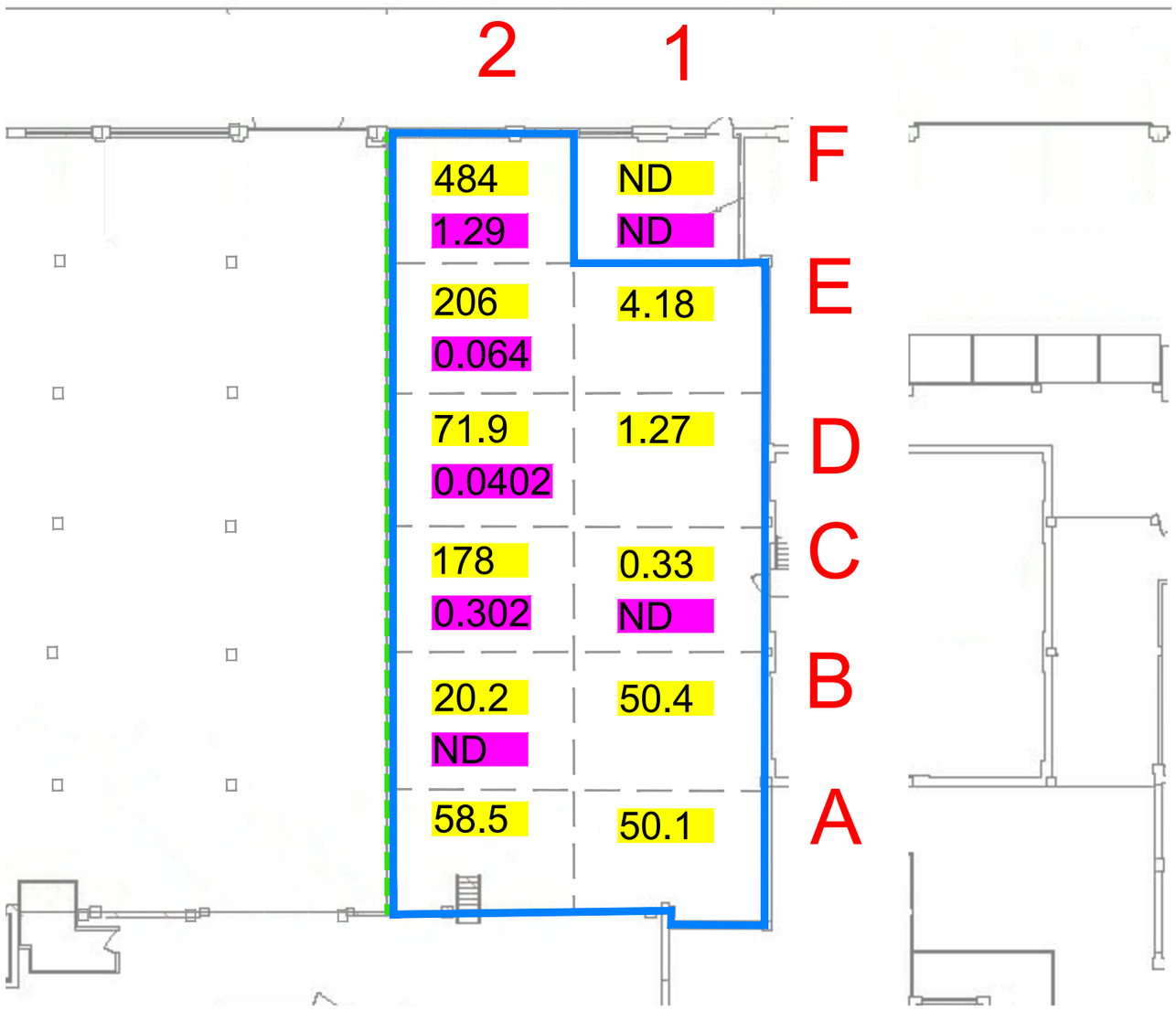
BUILDING FLOOR PLAN

REMEDIAL ACTION WORK PLAN ADDENDUM

FORMER TRICO PLANT
791 WASHINGTON STREET
BUFFALO, NEW YORK

PREPARED FOR

847 MAIN STREET, LLC & 791 WASHINGTON STREET, LLC



PROJECT NORTH

20' 0' 20' 40'

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

LEGEND:

206 — CONCRETE SAMPLE RESULT; RESULTS REFLECT PCB CONCENTRATION IN MILLIGRAMS PER KILOGRAM (MG/KG)

0.064 — SUBSLAB SOIL SAMPLE RESULT CONCENTRATION IN MG/KG

AREA OF CONCRETE TO BE REMOVED AND DISPOSED AT TSCA LANDFILL

DATE: NOVEMBER 2019
DRAFTED BY: RFL

F:\CAD\TurnKey\Krog\Former Trico Building BCP\RAWP\Dec 2019 Revisions\Figure 3; Loading Dock Sample Results and RemediationREV.dwg, 12/11/2019 7:47:36 AM

LOADING DOCK CONCRETE & SOIL SAMPLE RESULTS AND CONCRETE AREAS TO BE REMOVED

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FORMER TRICO PLANT
791 WASHINGTON STREET
BUFFALO, NEW YORK
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FIGURE 3

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

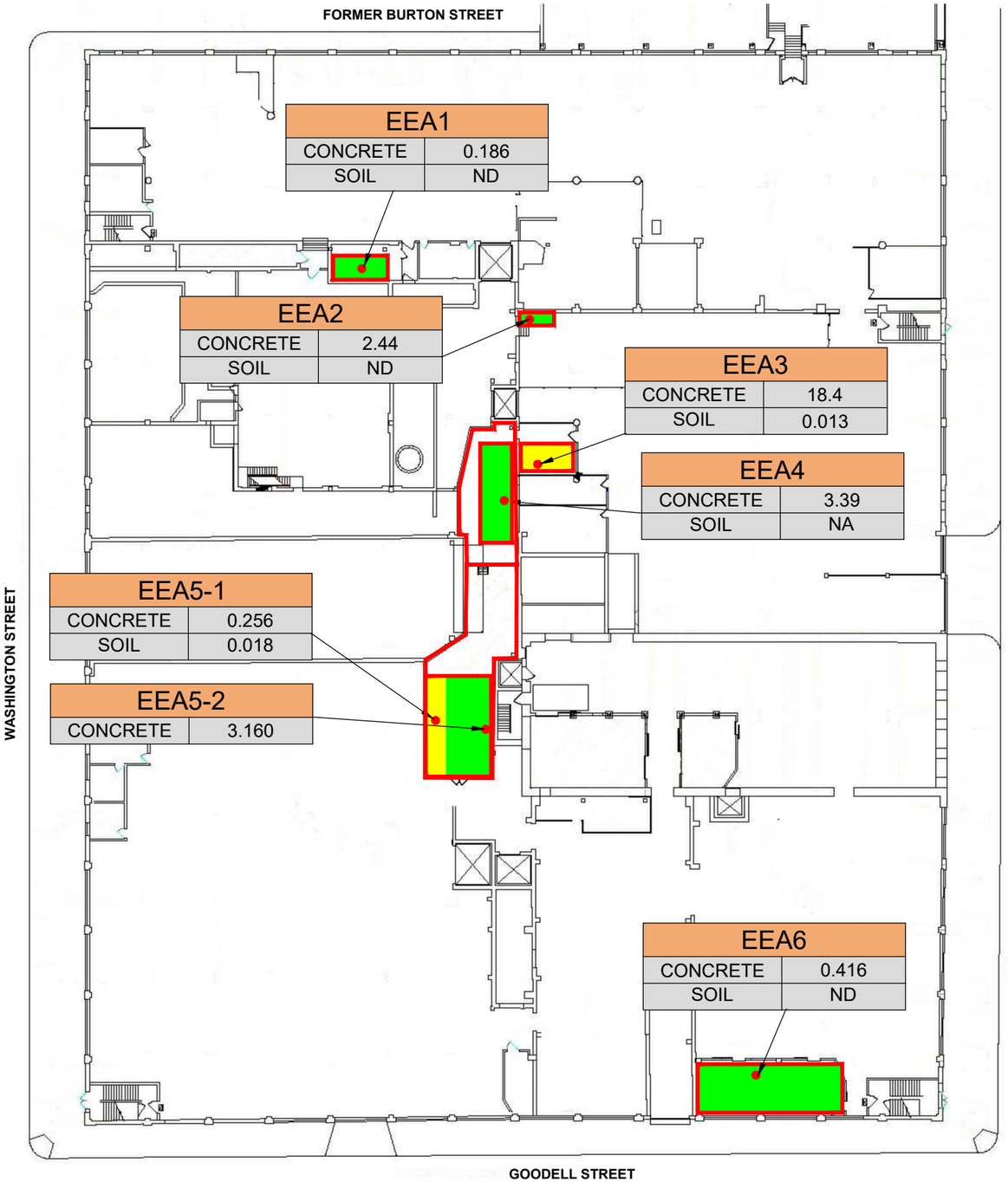
JOB NO.: 0092-016-001-009

F:\CAD\TurnKey\Krog\Former Trico Building BCP\RAWP\Dec 2019 Revisions\Figure 4; Electric Equip Area Sample Results.dwg, 12/10/2019 3:18:17 PM

LEGEND:

- SAMPLING AREA (6 AREAS)
- AREA WHERE ALL OIL-FILLED ELECTRICAL EQUIPMENT CONTAINED <50 PPM PCBs
- AREA WHERE OIL-FILLED ELECTRICAL EQUIPMENT CONTAINED >50 PPM PCBs
- CONCRETE AND SUBSLAB SOIL SAMPLE LOCATION
- CONCRETE AND SOIL SAMPLE RESULTS; RESULTS REFLECT PCB CONCENTRATION IN MILLIGRAMS PER KILOGRAM.

EEA6	
CONCRETE	
SOIL	



N

40' 0' 40' 80'

SCALE: 1 INCH = 40 FEET
SCALE IN FEET
(approximate)

DATE: DECEMBER 2019
DRAFTED BY: RFL

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JOB NO.: 0092-016-001

ELECTRIC EQUIPMENT AREA SAMPLE RESULTS

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791 WASHINGTON STREET
BUFFALO, NEW YORK
PREPARED FOR
847 MAIN STREET, LLC & 791 WASHINGTON STREET, LLC

FIGURE 4

ATTACHMENT 1

COMMUNICATIONS WITH EPA

Chris Z. Boron

From: Conetta, Benny <Conetta.Benny@epa.gov>
Sent: Tuesday, December 10, 2019 10:32 AM
To: Tom H. Forbes
Cc: Kavvadias, Eleni; Staniszewski, Chad (DEC); Walia, Jaspal (DEC); Chris Z. Boron; Kavvadias, Eleni; Ferreira, Steve
Subject: RE: Trico Building - Oil Filled Electrical Equipment Room Floor Samples

Tom,

The less than 50 ppm capacitors areas – based on the info you provided do not appear to be an issues.

The only area that would seem to be of concern from a TSCA standpoint would be EEA3 where the release was from a pcb containing capacitor (or other electrical equipment). That area with 18 ppm needs to be dealt with. If this is being done under a performance based approval (and shipped to a TSCA facility) there is no further need to involve EPA. If you want to are sending to somewhere else, you can submit a separate self-implementing clean-up plan or make it part of the plan you have already drafted. Just make sure to document whatever you do and keep records.

The EEA5-1 (and possibly 5-2), is a bit weird in that the non-pcb capacitor has a concrete stain > than one and the other pcb containing capacitor is less than 1. The only issue here appears to be the need to remove the capacitor.

As far as what is done in the other areas, that would be subject to DEC decides as the releases are from non-pcb capacitors (so not regulated by TSCA) or less than 1 in areas where there are PCB capacitors (so not an issue).

From: Tom H. Forbes <TForbes@bm-tk.com>
Sent: Wednesday, November 27, 2019 5:15 PM
To: Conetta, Benny <Conetta.Benny@epa.gov>
Cc: Kavvadias, Eleni <kavvadias.eleni@epa.gov>; Staniszewski, Chad (DEC) <chad.staniszewski@dec.ny.gov>; Walia, Jaspal (DEC) <jaspal.walia@dec.ny.gov>; Chris Z. Boron <cboron@bm-tk.com>
Subject: Trico Building - Oil Filled Electrical Equipment Room Floor Samples

Mr. Conetta,

Per our discussion today, the NYSDEC requested that we sample six areas within the former Trico building that previously contained oil-filled electrical equipment. These areas are comprised of 5 rooms and one diked area (this was actually a room with a diked area within it) in the basement of the building not associated with the first-floor loading dock area that we are addressing separately. The oil-filled electrical equipment in the basement was tested earlier this year in preparation for removal and proper disposal, and was found to be <50 ppm in all cases except in two of the six areas, where all or some of the equipment contained PCBs >50 ppm.

The attached Figure shows the subject rooms/areas, with those containing non-TSCA regulated equipment shaded green and TSCA-regulated equipment shaded yellow. One room had a wall of suspended equipment where the equipment contained oils >50 ppm (51 ppm, to be exact), and the opposite wall contained equipment with oils <50 ppm.

All of the concrete results fell below 4 ppm except in the room with the diked area where we had levels of 18 ppm. That floor and underlying soils in that area will be dealt with as a performance-based disposal approach (removed to <1 ppm PCBs) since the former equipment contained PCBs>50 ppm.

On the remaining rooms, soils were all <1 ppm and concrete generally ranged from <1 ppm to <4 ppm as indicated on the attached figure. In the room containing both regulated and unregulated equipment, the concrete sample beneath the former regulated equipment yielded less than 1 ppm and the sample beneath the unregulated equipment yielded 3.1 ppm PCBs, indicating the concentrations > 1 ppm were from non-regulated equipment.

We have no documentation to suggest that any of the equipment was retro-filled. On that basis, we do not believe we have TSCA-regulated releases with the exception of the subject area where the floors contained PCBs of approximately 18 ppm. Nevertheless, we intend to pour a 6-inch concrete cover in all of the subject rooms where PCBs are present in concrete > 1 ppm and replace the concrete in the 18 ppm area after removal to assure no residual exposure.

Will you kindly confirm that our assumptions concerning the TSCA applicability are correct?

Thank you for your continued assistance,

Tom Forbes

Thomas H. Forbes, P.E.
Principal Engineer
tforbes@benchmarkturnkey.com

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