

December 16, 2025

Joshua Vacarro
Project Manager
NYSDEC Division of Remediation
700 Delaware Avenue
Buffalo, New York 14202
joshua.vacarro@dec.ny.gov

Re: Work Plan for Additional PCB Air Sampling
Former Trico Plant, BCP Site No. C915281
628 Ellicott Street
Buffalo, New York 14203

Dear Mr. Vacarro:

On behalf of 847 Main Street, LLC and 791 Washington Street, LLC, Roux Environmental Engineering and Geology, D.P.C. (Roux) has prepared this work plan for additional polychlorinated biphenyl (PCB) air sampling on the 4th floor of the Former Trico Plant, 628 Ellicott Street, Buffalo, New York. In the comment letter dated November 12, 2025 received from the New York State Department of Environmental Conservation and New York State Department of Health (collectively referred to as the Departments) concerning indoor air and concrete results, comment 6a requested a work plan detailing the investigation to determine if the source of PCBs in indoor air is related to PCB contaminated dust or volatilization from PCB impacted materials. This work plan provides details of this air sampling.

Scope of Work

Roux will collect additional air samples on the 4th floor of the building in the area previously sampled in response to odor complaints to assess if the PCBs detected in the indoor air are related to particulate phase (dust) or vapor phase (volatilization from building materials). Roux proposes recollecting air samples from the following locations that were previously sampled in May 2025.

- 4th Floor: Units 428, 444 and Duplicate, 448, 450, 452, and Hallway.
- Ambient outdoor air

The attached drawing shows the approximate location of the proposed 4th floor samples. The ambient outdoor air will be collected from the roof of the building on the upwind side of the roof based on the wind direction the day of the sampling.

The initial air samples collected from Units 444 (and associated Duplicate), 448, 450, and 452, were collected with the heating and cooling systems and the fresh air returns to the Units turned off, to create a stagnant air condition within the Units. For this additional sampling event, we propose operating the heating and cooling systems at 70° F with the fresh air return to the Units in operation to represent typical HVAC operating conditions. Apartment entrance doorways will be closed for the duration of the sample collection period.

The air samples will be collected with polyurethane foam (PUF) cartridges outfitted with a filter head (to collect particulate) for a 24-hour period. The PUF cartridges and filter heads will be connected to sample pumps calibrated to draw approximately 5 liters per minute (l/min) for the sample duration. Sampling pumps used to collect indoor air samples collected in the apartment units will be positioned on the kitchen island of each unit consistent with the May 2025 sampling event. The hallway sampler will be located on a table in a sitting area with signage requesting that the equipment not be disturbed.

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The PUF cartridges and filter heads will be analyzed separately for PCBs via Method TO-10 to assess between particulate and vapor phase PCBs.

The analytical results from the air sampling will be tabulated, validated, and provided to the Departments.

Schedule

Roux proposes to complete this additional PCB sampling in January 2025. The Departments will be notified at least 7 days prior to the start of the sampling.

Please do not hesitate to contact us with any questions.

Sincerely,

ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.

A handwritten signature in blue ink, appearing to read "Chris Boron".

Christopher Boron, P.G.
Principal Geologist

A handwritten signature in blue ink, appearing to read "Tom Forbes".

Thomas H. Forbes, P.E.
Principal Engineer

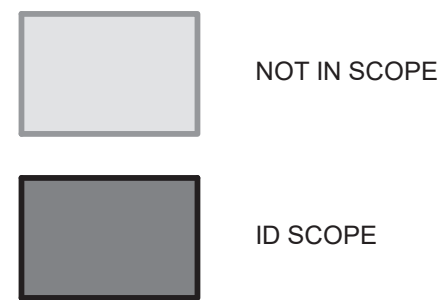
Attachments

ec: Chad Staniszewski, NYSDEC
Stanley Radon, NYSDEC
Benjamin McPherson, NYSDEC
Megan Kuczka, NYSDEC
Sara Bogardus, NYSDOH
Stephen Lawrence, NYSDOH
Peter Krog, 847 Main Street, LLC
Scott Fairbrother, The Krog Group
Robert Molnar, The Krog Group

ROUX



PLAN LEGEND



Concrete Sample Location

Air Sample Location

Unit 444 & DUP

Unit 448

Unit 450

Unit 452

4th HW -
Hallway

CON-3

CON-1

CON-2 &
DUP

1 FOURTH FLOOR PLAN
3/32" = 1'-0"

No.	Date	Description
2	05/25/23	Revision 2
1	05/05/23	Revision 1

SUBMISSIONS & REVISIONS

OWNER



ARCHITECT



INTERIOR DESIGNER

ANTUNOVICH ASSOCIATES
1144 3RD STREET NE
WASHINGTON, DC 20002
202.540.1144
ANTUNOVICH.COM

STRUCTURAL ENGINEER

M.E.P. & F.P. ENGINEERS

CIVIL ENGINEER

LANDSCAPE ARCHITECT

GENERAL CONTRACTOR

PROJECT

Trico Complex - Interior
Design - IFC Set
791 Washington Street
Buffalo, NY 14203

DRAWING TITLE

FLOOR PLAN -
FOURTH FLOOR

SEAL

DATE:
3/3/2022
DRAWN BY:
CO
CHECKED BY:
Checker
PROJECT NO:

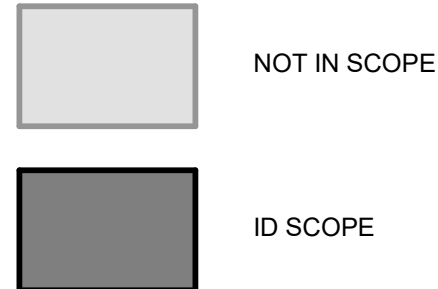
DRAWING NO:

ID0.06



1 FIFTH FLOOR PLAN
3/32" = 1'-0"

PLAN LEGEND



Concrete Sample Location

Air Sample Location

2 05/25/23 Revision 2

1 05/05/23 Revision 1

No. Date Description

SUBMISSIONS & REVISIONS

OWNER



The Krog Group

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STRUCTURAL ENGINEER

M.E.P. & F.P. ENGINEERS

CIVIL ENGINEER

LANDSCAPE ARCHITECT

GENERAL CONTRACTOR

PROJECT

Trico Complex - Interior Design - IFC Set
791 Washington Street
Buffalo, NY 14203

DRAWING TITLE

FLOOR PLAN - FIFTH FLOOR

SEAL

DATE:

3/3/2022

DRAWN BY:

CHECKED BY:

Checker

PROJECT NO:

DRAWING NO:

ID0.07