

December 16, 2025

Joshua Vacarro  
Project Manager  
NYSDEC Division of Remediation  
700 Delaware Avenue  
Buffalo, New York 14202  
[joshua.vacarro@dec.ny.gov](mailto: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 4<sup>th</sup> 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 4<sup>th</sup> 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.

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

The attached drawing shows the approximate location of the proposed 4<sup>th</sup> 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.

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.



Christopher Boron, P.G.  
Principal Geologist



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

Unit 428 - 4th BG  
Interior Background



Concrete Sample Location
Air Sample Location
2 05/25/23 Revision 2
1 05/05/23 Revision 1
No. Date Description
<b>SUBMISSIONS &amp; REVISIONS</b>
OWNER
 BMW MANAGEMENT CO. Home of Luxury Apartments
 The Krog Group
ARCHITECT
 ANTUNOVICH ASSOCIATES ARCHITECTURE PLANNING INTERIOR DESIGN
INTERIOR DESIGNER
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: ID0.06
DRAWING NO: ID0.06
COPYRIGHT 2021



## **PLAN LEGEND**

NOT IN SCOPE

ID SCOPE

- Concrete Sample Location
- Air Sample Location

SUBMISSIONS & REVISIONS		
o.	Date	Description
	05/25/23	Revision 2
	05/05/23	Revision 1

OWNER

The logo for BMW Management Co. consists of a stylized outline of a house with a gabled roof and a chimney. The letters 'BMW' are integrated into the outline of the house. Below the house outline, the words 'MANAGEMENT CO.' are written in a bold, sans-serif font. Underneath that, 'Home of Luxury Apts WNY' is written in a smaller, italicized, sans-serif font.

 The Krog Group

## ARCHITECT

A | r

ANTUNOVICH  
ASSOCIATES  
ARCHITECTURE PLANNING INTERIOR DESIGN  
1144 3RD STREET NE  
WASHINGTON, DC 20002  
202.540.1144  
ANTUNOVICH.COM

STRUCTURAL ENGINEER

11. *What is the primary purpose of the following statement?*

## LANDSCAPE ARCHITECT

## GENERAL CONTRACTOR

# PROJECT

# Trico Complex - Interior Design - IFC Set

**FLOOR PLAN - FIFTH  
FLOOR**

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

DRAWING NO: