

July 22, 2026

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

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

Dear Mr. Vaccaro:

On behalf of 847 Main Street, LLC and 791 Washington Street, LLC (Owners), Roux Environmental Engineering and Geology, D.P.C. (Roux) has prepared this Work Plan for expanded Polychlorinated Biphenyl (PCB) Air Sampling (Work Plan) at the Former Trico Plant, 628 Ellicott Street, Buffalo, New York (Site).

New York State Department of Environmental Conservation (NYSDEC) and New York State Department of Health (NYSDOH, collectively referred to as the Departments) have requested a plan to evaluate the extent and source of PCBs in the indoor air throughout the building. This Work Plan has been prepared to provide the scope of work for additional indoor air sampling to supplement the completed and ongoing PCB air sampling work on floors 3 through 5.

The Owners acknowledge that additional building media (including stained concrete) may require sampling and analysis for PCB but would like to implement the indoor air sampling for PCBs proposed herein and use the data to guide the building material sampling. The background section below has been prepared to discuss the various samplings of building media for PCBs and removal work historically completed as requested by the Departments.

BACKGROUND

The Owners' involvement with the Site began in 2013 with application for entrance of the Site into the Brownfield Cleanup Program, which was granted. The Site was formally acquired in May 2019 and a COC obtained in December 2019.

Trico Products Corporation (Trico) operated at the Site from the 1920s until operations ceased in the 1980s. During that time, the Trico operations began with operation in Building 1 (former Christian Weyland Brewery constructed in 1890s) and expanded with new construction of Buildings 2 (1924), 3 (1928), 7 (1936), and 8 (1937). Operations and equipment usage throughout the building changed with time, expansion, production needs, and equipment technology. Buildings 4 through 6 are believed to be associated with the former Trico operations in the building to the north of the Site (Innovation Center at 640 Ellicott Street).

Two (2) previous reports^{1 2} from the Site identify uses throughout the building, which represent the known uses at the time of operations ceased. As indicated, operations and equipment usage throughout the building likely changed with time. We note that the numbering of building floors was different in the two reports.

There was no manufacturing equipment remaining in the building at the start of the Owners involvement. Therefore, the presumed location of historic operations was based on reporting by others. We also note that prior to demolition and redevelopment, the entire building was hydro blasted to clean the walls, ceilings, and floors and to remove the peeling paint, mold, and loose debris throughout the building.

A 3rd previous report³ was also reviewed for PCB sampling data. URS collected solid samples from debris on the floors, linoleum-like flooring materials, etc. from within the building for PCB analysis as part of the URS Phase II. However, samples collected were not from concrete or other remaining building material. Additionally, no figures were included in the electronic version of the report, and the number of the floors was not described.

PCB wipe sampling was completed on the floors within the building as part of the Watts Phase II. Wipe samples were collected from resurfaced floors and stained concrete floor areas. Although wipe sampling identified the presence of PCBs, wipe sampling is not a preferred method to assess PCB concentrations in porous media like concrete. In addition, as noted above, floors were hydro-blasted clean the walls, ceilings, and floors and to remove the peeling paint, mold, and loose debris throughout the building.

There was oil-filled electrical equipment present in multiple locations in the basement areas of the building. In 2019, as part of the BCP, the Owner completed PCB sampling on the concrete floors in these electrical equipment areas. These samples were collected by the USEPA's preference method of using a hammer drill and drill bit to generate drill cuttings for analysis. The PCB results were included on Figure 6 of the Final Engineering Report⁴ and discussed in Section 4.3.8 of the FER. The areas where PCBs were detected above 1 mg/kg were removed, replaced with concrete, and/or replaced with a 2-foot crushed stone cover system with demarcation layer installed (engineering control). Areas that were covered with a 2-foot crushed stone cover system in 2019, were later removed redevelopment and replaced with concrete. This work was done in accordance with the Remedial Action Work Plan Addendum⁵.

PCB sampling of concrete floors was also completed on the Street Level floor, and 1st through 6th floors to assess the concrete to be removed as part of demolition and/or redevelopment. PCBs were identified in an area on the Street Level floor referred to as the Loading Dock Area (see Figure 7 and Section 4.3.11 of the FER). The area of the Loading Dock, which was a component of the Site cover system (engineering control), was removed, disposed of at a TSCA-regulated facility as required by EPA for Performance-Based Cleanups, and replaced with a new concrete slab in 2019. The remaining portion of the Loading Dock Area which was a suspended concrete slab over the basement in the southwestern

¹ "Targets Phase II Environmental Investigation Sampling Report for The Century Centre I, Six-Story Trico Building Production Facility, 791 Washington Street, Buffalo, New York". Prepared by Watts Architecture & Engineering, PC. May 2027. (Watts Phase II)

² "Trico Complex Redevelopment Feasibility Study". October 2012. (Feasibility Study)

³ "Limited Phase II Environmental Assessment of the Former Trico Plant I Facility, Buffalo, NY, 14203.

" Prepared by URS Corporation. January 2002. (URS Phase II)

⁴ "Final Engineering Report, Former Trico Plant, BCP Site No. C915281, Buffalo, New York". Prepared by Benchmark Civil/Environmental Engineering & Science, PLLC. December 2019.

⁵ "Remedial Action Work Plan Addendum, Former Trico Plant, BCP Site C915281". Prepared by Benchmark Civil/Environmental Engineering & Science, PLLC. December 2029.

portion of the building was removed during redevelopment in 2022, disposed of, and replaced with a new concrete floor (see Section 4.2.1 of the May 2023 Periodic Review Report⁶ (PRR)).

The PCB sampling of concrete slabs on the 1st through 6 floors were done to assess those floors for PCB prior to demolition of this area of the building to create the Courtyard area entrance and atrium entrance to the building off Ellicott Street. The concrete sampling results identified on the 1st floor ranged from less than 1 mg/kg to 5.7 mg/kg. Based upon these results (all non-detect or less than 10 mg/kg) the concrete was approved by the Departments for reuse as backfill within the former sub-basement and portion of the boiler room. PCB samples from the concrete on the 2nd through 6th floor did not exceed 1 mg/kg (see Table 3 and Appendix J of the FER for results and sampling locations) and were approved by the Department to be taken off-site for recycling (see Section 4.3.10 of the FER).

As discussed in the FER (Sections 4.3.10 and 4.3.10.1) the 1st floor concrete and ceiling of the basement (underside of the 1st floor) within the demolition area with PCB concentrations between 1 mg/kg and 5.7 mg/kg were painted bright green and covered with an orange demarcation layer prior to the start of demolition. After the demolition was completed, the building material debris processing began, which involved sorting the various building materials (steel, brick, concrete block, concrete slabs, etc.). When the painted concrete or the demarcation layer was encountered, the concrete was reuse as backfill within the former sub-basement and portion of the boiler room. The 1st floor concrete material that was unable to be used in the sub-basement and portion of the boiler room was transported to a sanitary landfill for disposal.

In concert with flooring removal work in the Loading Dock area, NYSDEC requested the walls in the southeastern portion of the Street Level area also be sampled for PCBs. The sampling was completed in accordance with Department-approved work plans^{7 8}. PCB above 1 mg/kg were encountered in only one (1) sample location, in the northwestern portion of the Loading dock area. This area was included in the Site Management Plan⁹ for the Site. The PCB concentrations were 50.1 mg/kg, were delineated, removed, and disposed of at a TSCA-regulated facility as required by EPA for Performance-Based Cleanups in 2023 and documented in the 2024 PRR¹⁰.

As part of Site redevelopment which began in October 2022, the Owners implemented the SMP and associated Excavation Work Plan Notification¹¹ for redevelopment activities that generated concrete and building materials. Demolition debris that was generated during redevelopment was sampled in accordance with the SMP. NYSDEC correspondence concerning the demolition debris sampling and

⁶ "Periodic Review Report, April 26, 2022 to April 26, 2023, Former Trico Plant, BCP Site No. C915281, Buffalo, New York". Prepared by Benchmark Civil/Environmental Engineering & Science, PLLC. May 2023.

⁷ "Revised Wall Sampling Work Plan for the Former Loading Dock & Future Interior Parking Areas, Former Trico Plant, BCP Site No. C915281". Prepared by Benchmark Civil/Environmental Engineering & Science, PLLC. December 2019.

⁸ "Supplemental Interior Wall Sampling Work plan for the Area of Northwest Wall #2, Former Trico Plant, BCP Site No. C915281". Prepared by Benchmark Civil/Environmental Engineering & Science, PLLC. February 2020.

⁹ "Site Management Plan, Brownfield Cleanup Program, Former Trico Plant, NYSDEC Site Number: C915281, Buffalo, New York. Prepared by Benchmark Environmental Engineering & Science, PLLC. December 2019. [This document was revised in March 2025 (Revision #1)].

¹⁰ "Periodic Review Report, Former Trico Plant site, NYSDEC BCP #C915281, Buffalo, New York." Prepared by Roux Environmental Engineering and Geology, DPC. Revised June 2024.

¹¹ "Excavation Work Notification, Former Trico Plant, BCP Site No. C915281, Excavation Work Notification for Subsurface Utility & Foundation Activities." Prepared by Benchmark Environmental Engineering & Science, PLLC. October 19, 2022.

approvals were included in Attachment 1 of Roux's correspondence letter¹² to NYSDEC on December 5, 2025.

The analytical data from the various building materials sampled were provided to NYSDEC for review and approval of the proposed disposition of the material (i.e., on-site reuse, off-site recycling, or off-site disposal) prior to the material being reused or removed from the Site.

The annual Periodic Review Reports (PRRs) that were submitted for Department review and approval from 2021, 2022, 2023, and 2024 each discussing these activities under Section 4.2.1 – Site Redevelopment Activities and Section 4.2.2 – Exported Materials. The PRRs include demolition debris analytical results from the demolition debris sampling, transport manifests for materials that were taken to the sanitary landfill, and truck tickets for material taken off-site for recycling.

Lastly, concrete sampling for PCB analysis was also completed by the Owners as part of the initial odor complaint assessment in the building and the results were previously provided to the Departments. Concrete samples were collected from the 4th and 5th floors and additional sampling will be needed to delineate PCBs concentrations detected. Roux would like to use the results of the indoor air sampling for the other locations in the building to determine if a concern is present with indoor air that would require a source assessment.

This workplan has been prepared to evaluate PCBs in the indoor air. The proposed scope of work is provided below.

Scope of Work

Roux will collect PCB air samples from the basement, Street Level, and Floors 1 through 6 of the building for TO-10A analysis. These are in addition to the 8 samples to be collected on May 14th through 15th, 2026 per Roux's May 7th email to the Departments. The 42 proposed locations of the samples include the parking areas, lobby, stair wells, elevators, residential, and vacant commercial spaces throughout the building.

As of the date of this workplan, none of the 5 commercial spaces are leased/occupied and have not been built out or subdivided; and 234 of the 242 residential units are leased/occupied.

Roux proposes collecting PCB air samples from the following locations.

- Basement Parking Area: 2 samples
- Basement Parking Area bottom of Stairwell 2 and Stairwell 5
- Street Level: 3 samples
- 1st Floor: 3 samples
- 2nd Floor: 6 samples
- 3rd Floor: 4 samples
- 4th Floor: 5 samples
- 5th Floor: 6 samples
- 6th Floor: 6 samples
- 6th Floor top of Stairwell 2 and Stairwell 5
- Elevators 3 and Elevator 5 (samples to be placed inside elevator cars)

¹² "Concrete and Indoor Air Results – Response to comments, Former Trico Plant, NYSDEC BCP Site No. C915281." Prepared by Roux Environmental Engineering & Geology, DPC. December 5, 2025.

The attached drawings show the approximate location of the proposed PCB air samples. Due to the number of samples proposed to be collected, the sampling will occur as three (3) events based on the number of sample pumps available. This will allow the sample pumps to be recharged prior to the subsequent sampling events.

One (1) duplicate sample will be collected during each of the sampling events.

One ambient outdoor air will be collected from the roof of the building on the upwind side of the roof based on the wind direction during one sampling event.

During this sampling event, the tenants' preferred settings will be maintained during sampling. We note that the fresh air returns associated with the HVAC systems are a pre-set operating parameter of the systems, which are not able to be turned off by the tenants, and will be in operation.

The air samples will be collected with polyurethane foam (PUF) cartridges for a 24-hour period. The PUF cartridges will be connected to sample pumps calibrated to draw approximately 5 liters per minute (l/min) for the sample duration. The PUF cartridges will be analyzed for PCBs via Method TO-10.

Sampling pumps used to collect indoor air samples collected in the apartment units will be positioned in the kitchen of each unit consistent with the previous sampling events, unless the tenant of an occupied unit requests a different location. Sample locations will be documented. The parking garage or hallway sample locations will be located with signage requesting that the equipment not be disturbed.

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 June 2026. The Departments will be notified at least 7 days prior to the start of the 1st sampling event.

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

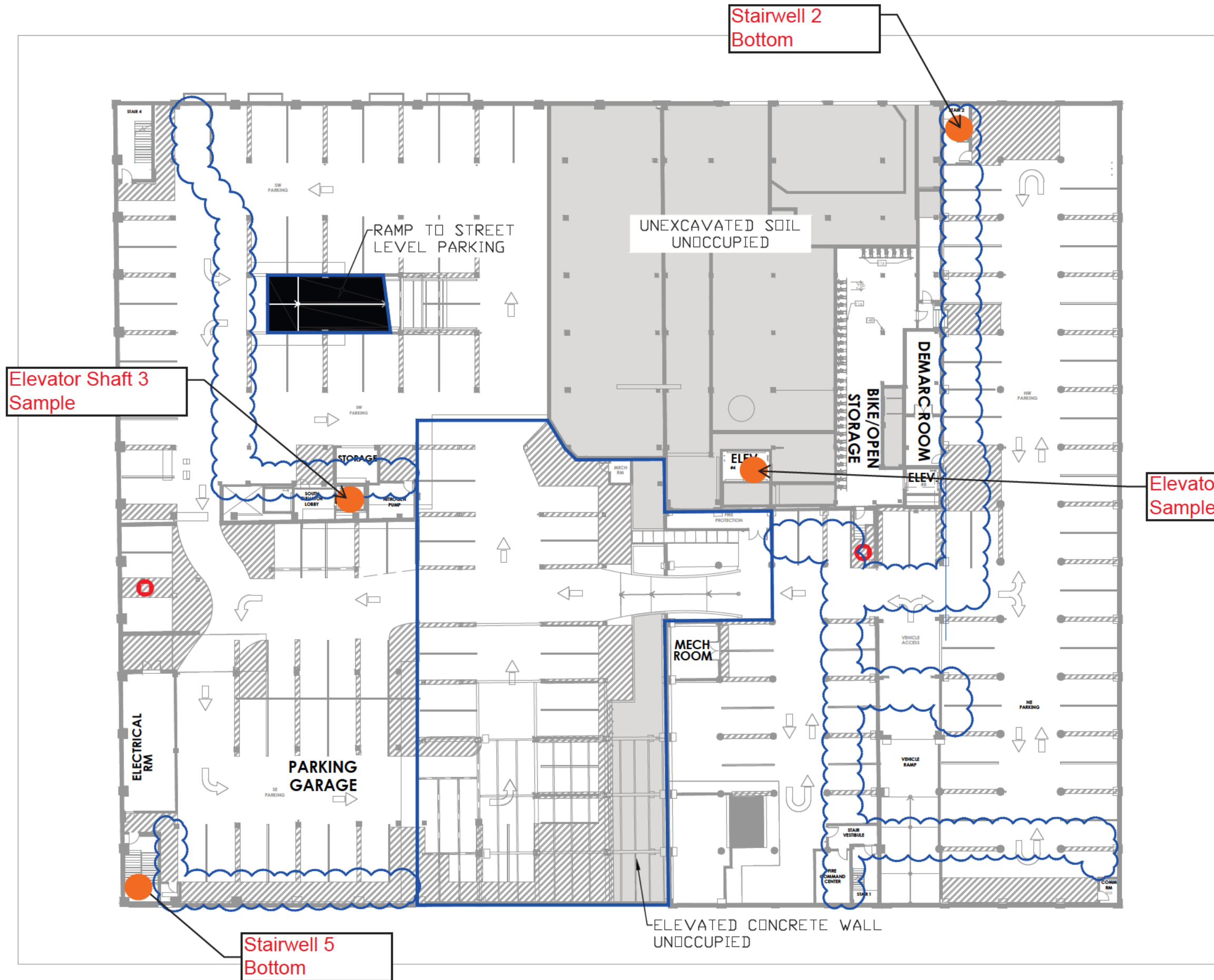
Attachments

ec: Chad Staniszewski, NYSDEC
Stanley Radon, NYSDEC
Benjamin McPherson, NYSDEC
Megan Kuczka, NYSDEC

ROUX

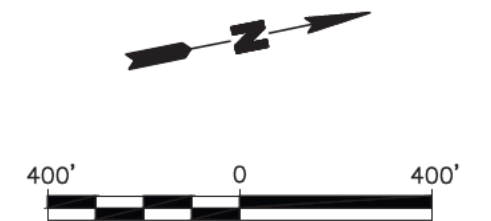
Sara Bogardus, NYSDOH
Stephen Lawrence, NYSDOH
Peter Krog, 847 Main Street, LLC
Scott Fairbrother, The Krog Group
Robert Molnar, The Krog Group

F:\CAD\0-ROUX\KNOER GROUP\TRICO\WORK PLAN FOR PCB AIR SAMPLING\FIGURE 1: BASEMENT PARKING PLAN_A-100.DWG C:\KANALEY

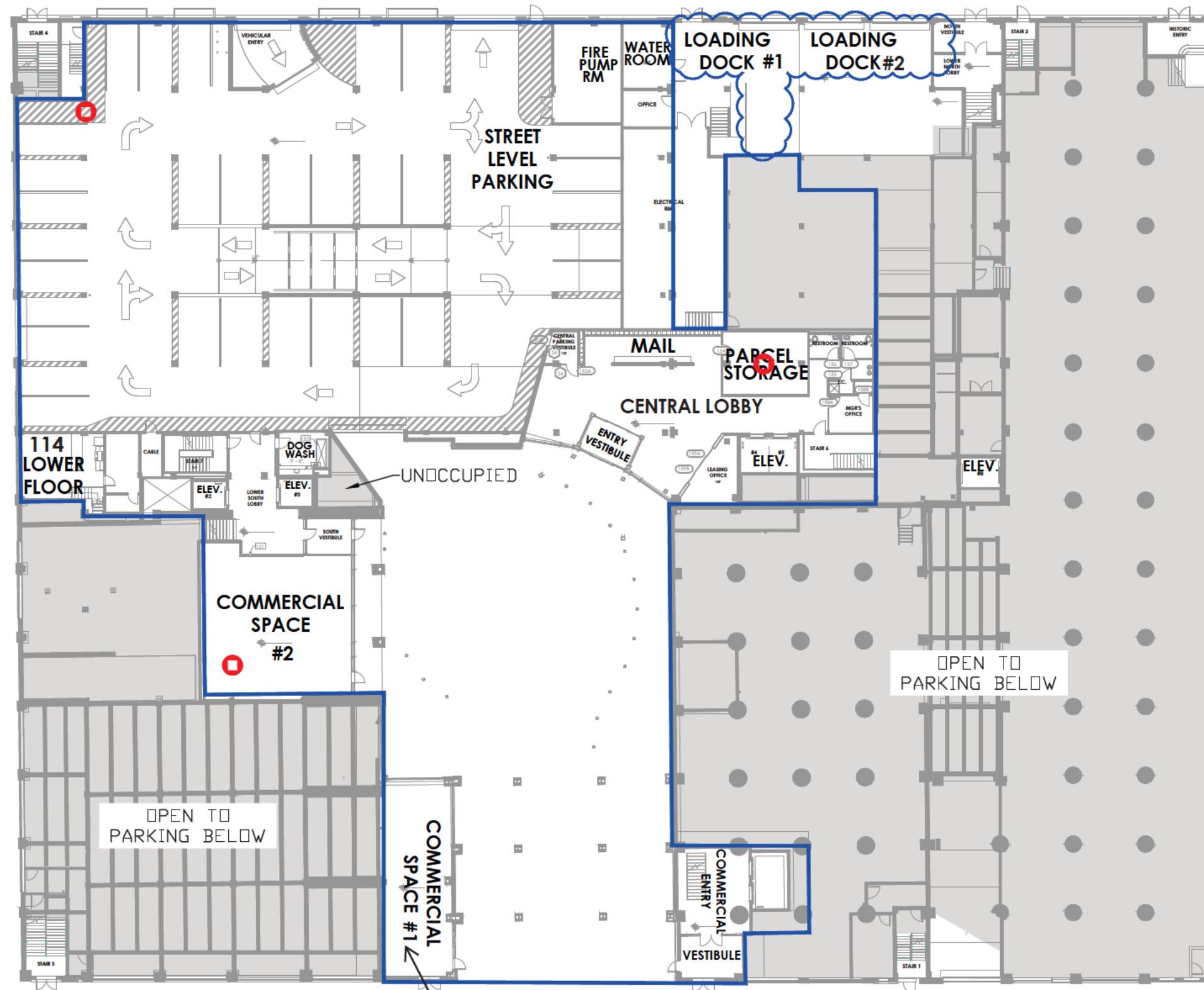


LEGEND

-  PROPOSED SAMPLE LOCATION
-  CONCRETE REMOVAL AND REPLACEMENT AREAS
-  APPROXIMATE AREAS OF CONCRETE REMOVAL AND REPLACEMENT FOR UTILITY INSTALLATION
-  Additional Proposed Locations



Title:			
BASEMENT PARKING PLAN			
WORK PLAN FOR FORMER TRICO			
BUILDING PCB AIR SAMPLING			
FORMER TRICO BUILDING (BCP SITE C915281)			
628 ELLICOTT STREET, BUFFALO, NEW YORK 14203			
Prepared for:			
THE KNOER GROUP			
		Compiled by: JJY	Date: JUNE 2026
		Prepared by: CNK	Scale: N/A
		Project Mgr: CZB	Project: 4319.0002B000
		File: FIGURE 1: BASEMENT PARKING PLAN_A-100.DWG	
			FIGURE 1



New Concrete in
this Commercial
Space

LEGEND

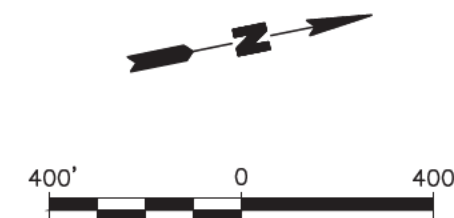
-  PROPOSED SAMPLE LOCATION
-  CONCRETE REMOVAL AND REPLACEMENT AREAS
-  APPROXIMATE AREAS OF CONCRETE REMOVAL AND REPLACEMENT FOR UTILITY INSTALLATION
-  Additional Proposed Locations



Title:			
STREET LEVEL PLAN			
WORK PLAN FOR FORMER TRICO			
BUILDING PCB AIR SAMPLING			
FORMER TRICO BUILDING (BCP SITE C915281)			
628 ELLICOTT STREET, BUFFALO, NEW YORK 14203			
Prepared for:			
THE KNOER GROUP			
	Compiled by: JJY	Date: JUNE 2026	FIGURE 2
	Prepared by: CNK	Scale: N/A	
	Project Mgr: CZB	Project: 4319.0002B000	
	File: FIGURE 2; STREET LEVEL PLAN_A-101.DWG		

 PROPOSED SAMPLE LOCATION
 FORMER DEMOLITION AREA
 (CONCRETE NO LONGER EXISTS)

● Additional Proposed Locations



WORK PLAN FOR FORMER TRICO BUILDING PCB AIR SAMPLING

FORMER TRICO BUILDING (BCP SITE C915281)
628 ELLICOTT STREET, BUFFALO, NEW YORK 14203

Prepared for:

THE KNOER GROUP



Compiled by: JJY	Date: JUNE 2026
Prepared by: CNK	Scale: N/A
Project Mgr: CZB	Project: 4319.0002B000
File: FIGURE 3; FIRST FLOOR PLAN_A-102.DWG	

FIGURE

3



LEGEND

-  PROPOSED SAMPLE LOCATION
-  CONCRETE REMOVAL AND REPLACEMENT AREAS
-  FORMER DEMOLITION AREA (CONCRETE NO LONGER EXISTS)
-  Additional Proposed Locations

Title:

SECOND FLOOR PLAN

WORK PLAN FOR FORMER TRICO

BUILDING PCB AIR SAMPLING

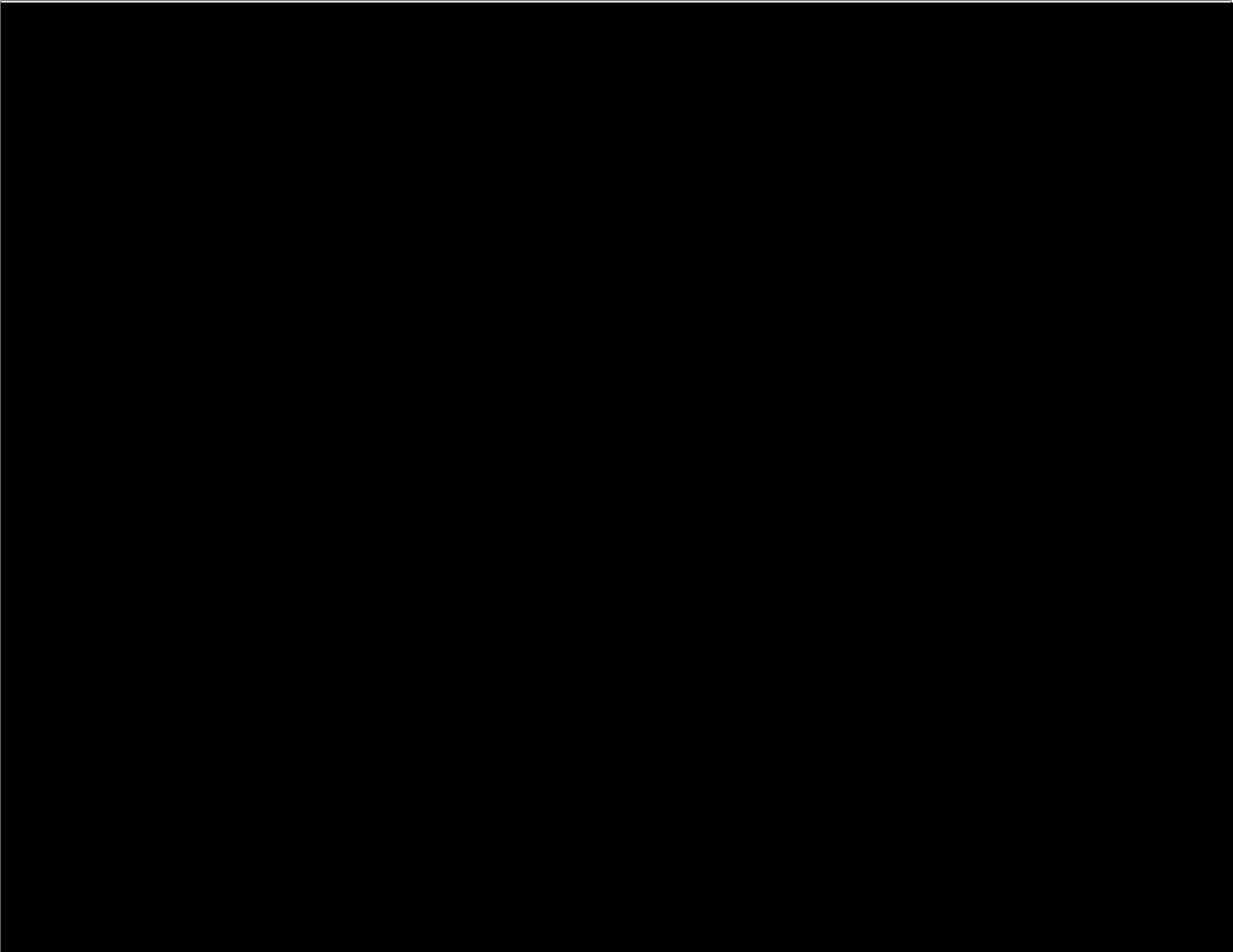
FORMER TRICO BUILDING (BCP SITE C915281)
628 ELLICOTT STREET, BUFFALO, NEW YORK 14203

Prepared for:

THE KNOER GROUP

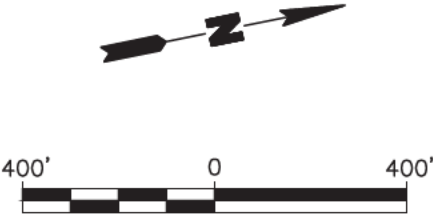
	Compiled by: JJY	Date: JUNE 2026	FIGURE 4
	Prepared by: CNK	Scale: N/A	
	Project Mgr: CZB	Project: 4319.0002B000	
	File: FIGURE 4; SECOND FLOOR PLAN_A-103.DWG		

F:\CAD\0-ROUX\KNOER GROUP\TRICO\WORK PLAN FOR PCB AIR SAMPLING\FIGURE 5; THIRD FLOOR PLAN_A-104.DWG CKANALEY



LEGEND

-  PROPOSED SAMPLE LOCATION
-  MAY 14TH SAMPLE LOCATION
-  CONCRETE REMOVAL AND REPLACEMENT AREAS
-  FORMER DEMOLITION AREA (CONCRETE NO LONGER EXISTS)
-  Additional Proposed Locations



Title:

THIRD FLOOR PLAN

WORK PLAN FOR FORMER TRICO

BUILDING PCB AIR SAMPLING

FORMER TRICO BUILDING (BCP SITE C915281)

628 ELLICOTT STREET, BUFFALO, NEW YORK 14203

Prepared for:

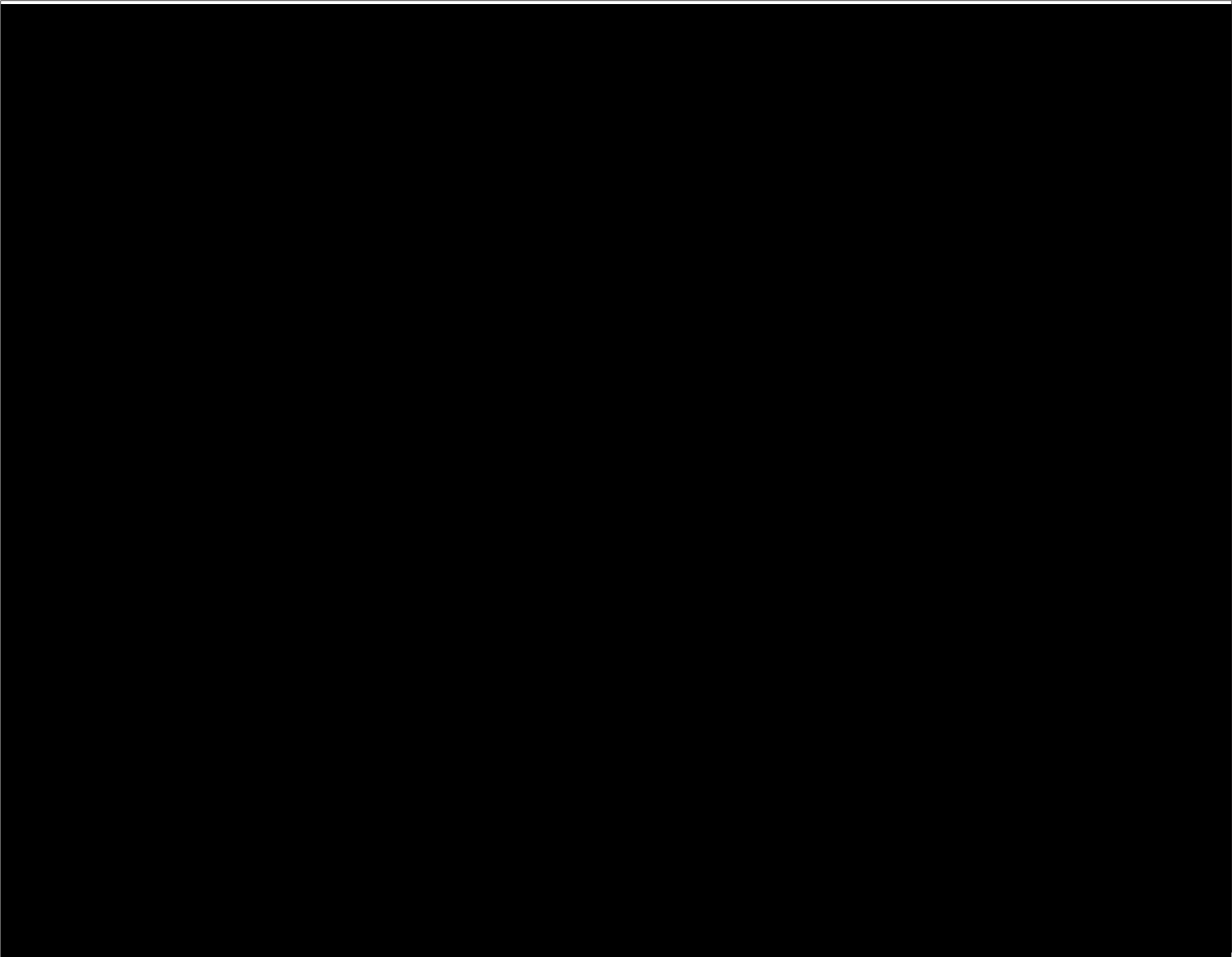
THE KNOER GROUP



Compiled by: JJY	Date: JUNE 2026
Prepared by: CNK	Scale: N/A
Project Mgr: CZB	Project: 4319.0002B000
File: FIGURE 5; THIRD FLOOR PLAN_A-104.DWG	

FIGURE

5



LEGEND

-  PROPOSED SAMPLE LOCATION
-  MAY 14TH SAMPLE LOCATION
-  PREVIOUSLY SAMPLED ROOM
-  CONCRETE REMOVAL AND REPLACEMENT AREAS
-  FORMER DEMOLITION AREA (CONCRETE NO LONGER EXISTS)

-  Additional Proposed Locations



Title:

FOURTH FLOOR PLAN

WORK PLAN FOR FORMER TRICO

BUILDING PCB AIR SAMPLING

FORMER TRICO BUILDING (BCP SITE C915281)

628 ELLICOTT STREET, BUFFALO, NEW YORK 14203

Prepared for:

THE KNOER GROUP

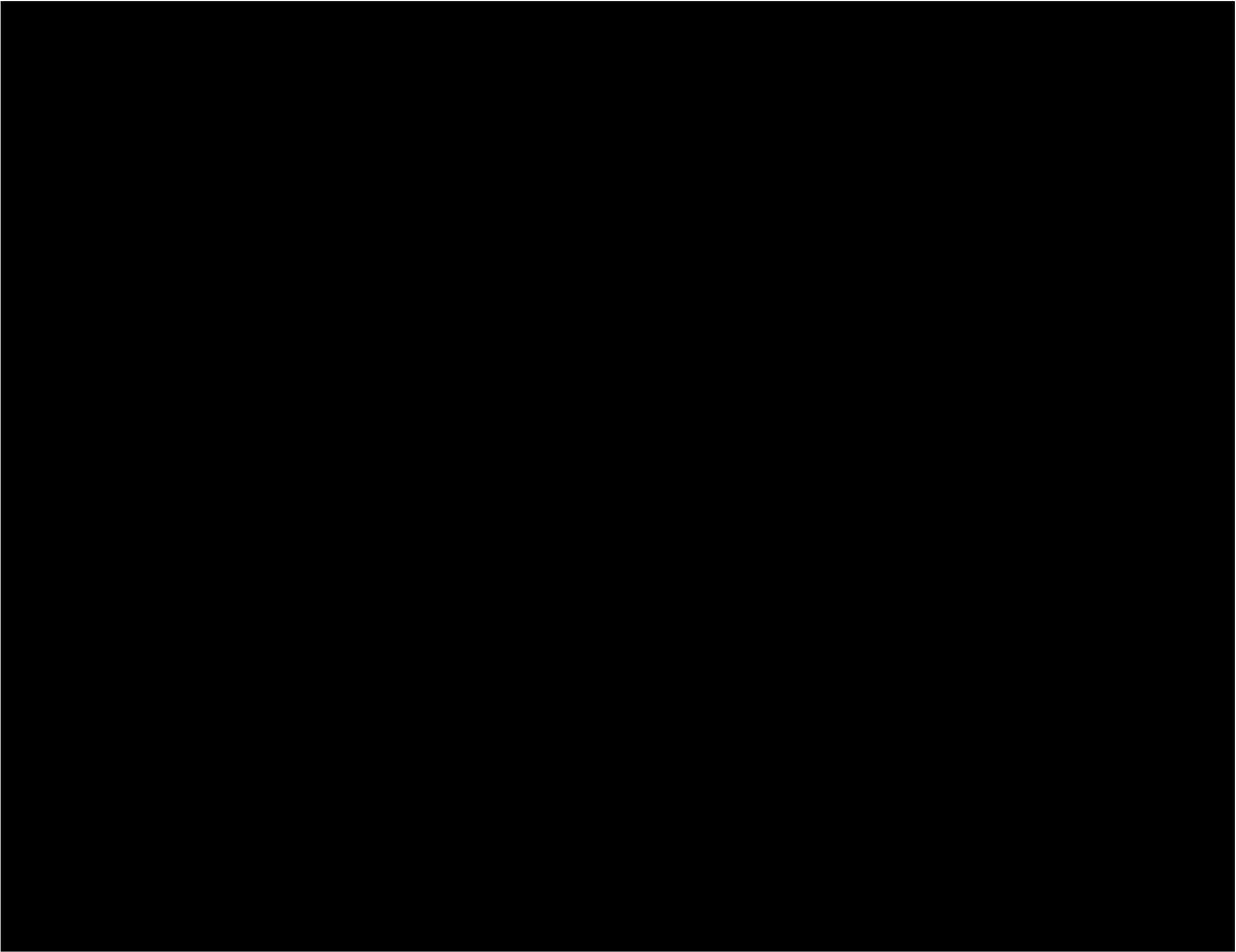


Compiled by: JJY	Date: JUNE 2026
Prepared by: CNK	Scale: N/A
Project Mgr: CZB	Project: 4319.0002B000
File: FIGURE 6; FOURTH FLOOR PLAN_A-105.DWG	

FIGURE

6

F:\CAD\0-ROUX\KNOER GROUP\TRICO\WORK PLAN FOR PCB AIR SAMPLING\FIGURE 7; FIFTH FLOOR PLAN_A-106.DWG CKANALEY



LEGEND

-  PROPOSED SAMPLE LOCATION
-  MAY 14TH SAMPLE LOCATION
-  PREVIOUSLY SAMPLED ROOM
-  CONCRETE REMOVAL AND REPLACEMENT AREAS
-  FORMER DEMOLITION AREA (CONCRETE NO LONGER EXISTS)
-  Additional Proposed Locations



Title:

FIFTH FLOOR PLAN

WORK PLAN FOR FORMER TRICO

BUILDING PCB AIR SAMPLING

FORMER TRICO BUILDING (BCP SITE C915281)

628 ELLICOTT STREET, BUFFALO, NEW YORK 14203

Prepared for:

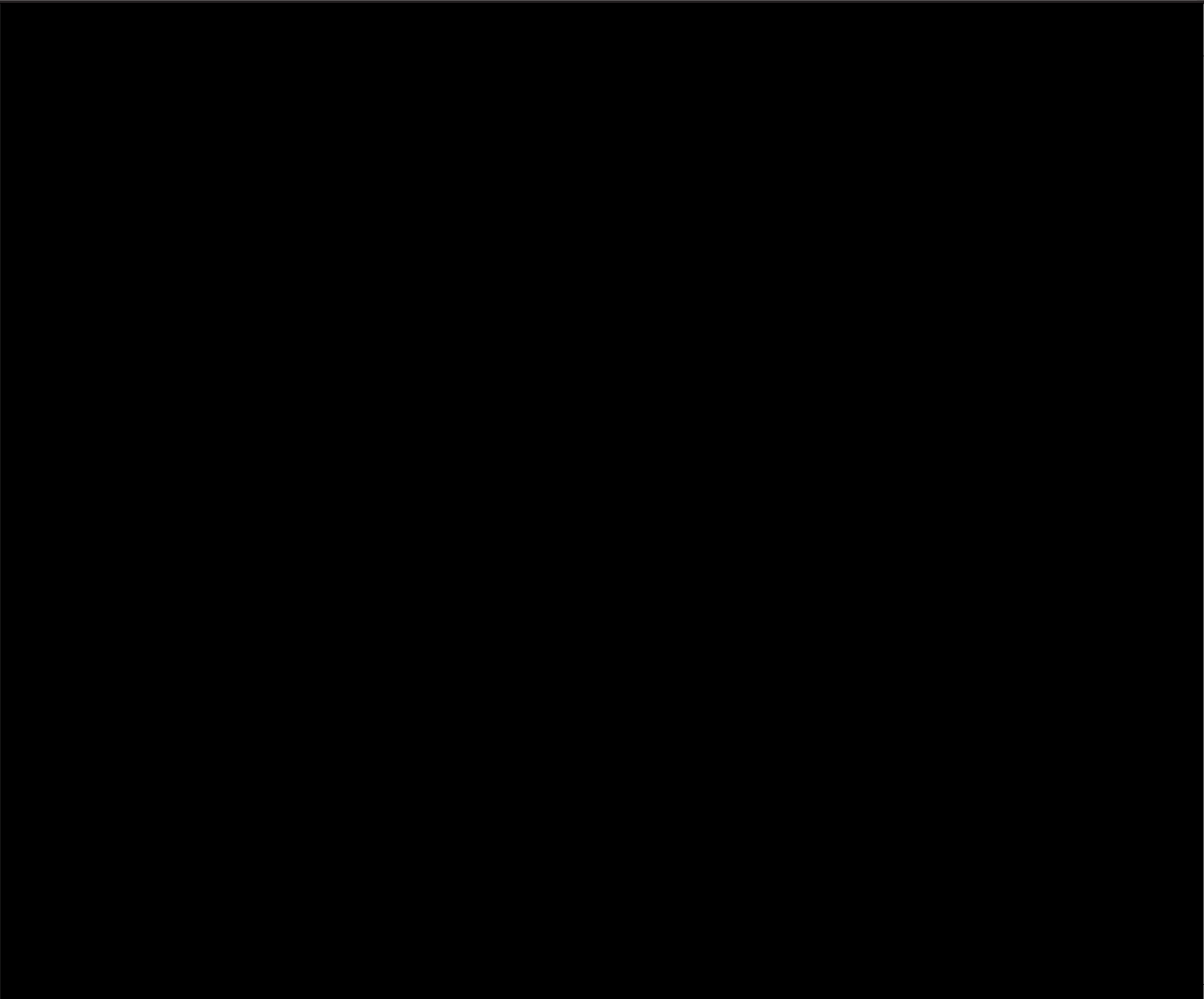
THE KNOER GROUP



Compiled by: JJY	Date: JUNE 2026
Prepared by: CNK	Scale: N/A
Project Mgr: CZB	Project: 4319.0002B000
File: FIGURE 7; FIFTH FLOOR PLAN_A-106.DWG	

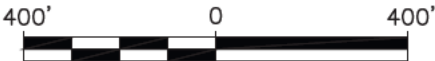
FIGURE

7



LEGEND

-  PROPOSED SAMPLE LOCATION
-  CONCRETE REMOVAL AND REPLACEMENT AREAS
-  FORMER DEMOLITION AREA (CONCRETE NO LONGER EXISTS)
-  Additional Proposed Locations



Title:

SIXTH FLOOR PLAN

WORK PLAN FOR FORMER TRICO

BUILDING PCB AIR SAMPLING

FORMER TRICO BUILDING (BCP SITE C915281)

628 ELLICOTT STREET, BUFFALO, NEW YORK 14203

Prepared for:

THE KNOER GROUP



Compiled by: JJY

Prepared by: CNK

Project Mgr: CZB

File: FIGURE 8; SIXTH FLOOR PLAN_A-107.DWG

Date: JUNE 2026

Scale: N/A

Project: 4319.0002B000

FIGURE

8