December 3, 2025

Ms. Veronica Kreutzer
Assistant Engineer (Environmental)
NYSDEC Division of Environmental Remediation
700 Delaware Avenue
Buffalo, NY 14209

Re: Interim Remedial Measures Work Plan for Aboveground Storage Tank Removal
619 Exchange Street Site (C915403)
Buffalo, New York

Dear Ms. Kreutzer,

Roux Environmental Engineering and Geology, D.P.C. (Roux) is pleased to submit this Interim Remedial Measures (IRM) Work Plan for removal of the aboveground storage tank (AST) present at the 619 Exchange Street Site (BCP Site No. C915403) located at 619 Exchange Street, Buffalo, Erie County, New York (Site; see Figures 1 and 2).

PG Larkinville, LLC elected to pursue investigation, cleanup, and redevelopment of the Site under the New York State Brownfield Cleanup Program (BCP) and executed a Brownfield Cleanup Agreement (BCA) with the New York State Department of Environmental Conservation (NYSDEC) in December 2024 (Index No. C915403-03-24). Remedial Investigation (RI) activities, completed in April 2025 and May 2025, were documented in the September 2025 Remedial Investigation/Alternatives Analysis (RI/AA) Report[1]. As summarized in the RI/AA Report, based on the nature of the Site and the RI findings, the chosen remedy is a Track 4 Restricted-Residential Cleanup. As part of the chosen cleanup remedy, the existing 5,000-gallon AST is required to be removed from the Site. The purpose of this IRM Work Plan is to expedite removal of the AST thereby making the area beneath the AST accessible to determine whether subsurface petroleum impacts exist that will need to be addressed as part of the upcoming remedial activities. Further, the AST is currently in the way of planned building renovation activities; therefore removal of the AST will allow for construction work to continue in this part of the building. Additional information related to AST removal and planned investigation activities is provided below.

AST Background

Historic municipal records indicate the wiring for a fuel oil burner in 1979. During previous investigations, cut copper lines and a 5,000-gallon fuel gauge were identified at the Site. During the RI, an existing vaulted AST was identified along the south interior basement wall of building Section 1. Based on measurements of the AST, the volume is estimated at 5,000-gallons, consistent with the fuel gauge. The AST includes an aboveground fill port running north along the basement ceiling that extends through the north exterior wall of the building, and an aboveground vent pipe running south along the basement ceiling and extending through the south exterior wall. The vent/fill pipes appeared in good condition with no visible corrosion/voids and no concerns (staining, odors, etc.) noted along the pipe runs. A portion of the vault was removed, which allowed for limited access into the AST area. The AST was determined

[1] Roux Environmental Engineering and Geology, D.P.C. *Remedial Investigation/Alternatives Analysis Report, 619 Exchange Street Site, NYSDEC BCP #C915403, Buffalo, New York*. September 2025.

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California ■ Illinois ■ Massachusetts ■ New Jersey ■ New York ■ Texas ■ Virginia

to be empty except for less than two inches of sludge identified at the base of the tank. The AST was noted as being in good condition with no visual indications of corrosion or a release.

IRM activities will consist of removal, characterization (as needed), and disposal/recycling of the AST, vault, and appurtenant piping, as well as any remaining contents. Additionally, as further discussed below, a soil sample will be collected from the footprint of the AST to determine if the AST area should be designated as an AOC requiring remedial excavation activities.

AST Evaluation and Removal Activities

The AST is currently present in the basement of the existing building within a surrounding concrete vault. The vault is in the process of being removed to allow access to the AST. A Pre-Work Notification for NYS Petroleum Bulk Storage (PBS) Closure was provided in Appendix I of the RI/AA Report. As discussed above, the AST was inspected for residual contents and was determined to contain less than two inches of sludge at the bottom of the AST. This remaining material will be characterized to facilitate proper removal and disposal. The sludge material will be removed and containerized, and the interior of the AST will be cleaned. The washwater will also be containerized. Depending on access, the AST contents and washwater will be removed using a licensed vacuum truck or the contents will be extracted and placed into drums; extracted materials will be appropriately transported off-site and to a registered disposal/recycling facility. Appurtenant piping, including aboveground vent/fill pipes and remaining contents, if any, will be removed and handled in the same manner.

After removal of residual material and washwater, the AST, and associated piping will be transported off-site to a scrap metal facility.

Concrete Visual Inspection and Sub-Slab Soil Sampling

The concrete floor underlying the AST will be inspected for visual/olfactory evidence of petroleum release (i.e., staining, grossly contaminated material, petroleum odors). A photoionization detector (PID) will also be used to screen for total volatile organics above background (0 parts per million (ppm)). Roux notes that a preliminary inspection of the ground surface within the vault area did not reveal any visual/olfactory concerns or PID readings above background. If visually impacted/stained concrete exists beneath the AST, the concrete will be removed and stockpiled on-site on and covered with polyethylene sheeting for off-site disposal during remedial action activities.

After removal of concrete flooring with a concrete core drill from beneath the AST, one soil/fill sample (HC-12, continued sample designation from previous hand cored samples) will be collected from below subbase material using auger equipment. To allow for characterization of soil/fill beneath the building slab in the AST area, consistent with the approved RI/AA Work Plan, this interior hand core will be advanced to the maximum reach of the hand tools estimated at a depth of up to five fbgs, or equipment refusal, whichever occurs first.

The sample interval identified as the most impacted (i.e., greatest PID scan result and/or visual/olfactory evidence of impact) at the investigation location will be selected for laboratory analysis of NYSDEC Commissioners Policy 51 (CP-51) volatile organic compounds (VOCs), CP-51 semi-volatile organic compounds (SVOCs), Resource Conservation and Recovery Act (RCRA) metals, polychlorinated biphenyls (PCBs), pesticides, and herbicides. If the impacts are ubiquitous from grade to final depth or no impacts were identified, the sample interval will be selected based on the professional discretion of the field personnel and in consultation with the NYSDEC.

If impacts are identified, the AST area will be designated as an AOC and impacted soil/fill will be excavated and properly disposed in a manner consistent with the RAWP, which is currently in process and will be submitted under separate cover.

Spoils will be placed back into the cored auger hole in the same order as it was removed unless gross contamination (i.e., visible product) is encountered, in which case they will be placed in sealed NYSDOT-approved drums and labeled for subsequent characterization and disposal, if necessary.

Health and Safety Plan

Activities completed pursuant to this IRM Work Plan will be conducted in accordance with the site-specific Health and Safety Plan (HASP), provided in Appendix D of the NYSDEC-approved February 2025 Remedial Investigation Work Plan (RIWP)[2].

Community Air Monitoring

Real-time community air monitoring will be performed during AST removal/cleaning and intrusive soil/fill activities at the Site. A Community Air Monitoring Plan (CAMP) is included in Attachment 1. Particulate and VOC monitoring will be performed along the upwind and downwind perimeter of the work area during AST removal and soil/fill handling activities in accordance with this IRM Work Plan. The downwind CAMP station will be placed near a downwind building entrance to monitor potential exposure due to dust and/or VOCs leaving the building. Expected wind direction and CAMP locations are provided in Figure 2. The CAMP is consistent with the requirements for community air monitoring at remediation sites as established by the NYSDOH and NYSDEC. Accordingly, it follows procedures and practices outlined under NYSDEC's DER-10 (May 2-10) Appendix 1A (NYSDOH's Generic Community Air Monitoring Plan) and Appendix 1B (Fugitive Dust and Particulate Monitoring). During this work, Roux will provide the Department with daily field logs that include the CAMP summary tables.

Construction Monitoring and Reporting

Roux personnel will be on-site to document IRM activities. Documentation will include, at minimum, daily field logs with a description of activities completed, photographs, field sketches, and community air monitoring locations and results including CAMP summary tables. The NYSDEC will be notified of any CAMP exceedances and completed corrective actions within one business day. CAMP summary tables will be provided to NYSDEC if requested.

The completed field logs, disposal documentation, updated PBS Application to show the tank closure/removal date, and subsurface soil/fill analytical results will be submitted as part of an IRM Summary letter report. The IRM Summary letter report will also identify whether the AST area should be designated as an AOC requiring remedial excavation activities, in consultation with the NYSDEC.

A Final Engineering Report (FER) will be prepared at the conclusion of remedial activities. Activities completed pursuant to this IRM Work Plan will be fully documented in the FER. In addition, any documentation generated from this work, such as removal/disposal receipts, will be included in the FER.

[2] Roux Environmental Engineering and Geology, D.P.C. *Remedial Investigation Work Plan, 619 Exchange Street Site, BCP Site No. C915403*. February 2025.

Sincerely,

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

Bryan W. Mayback
Technical Director

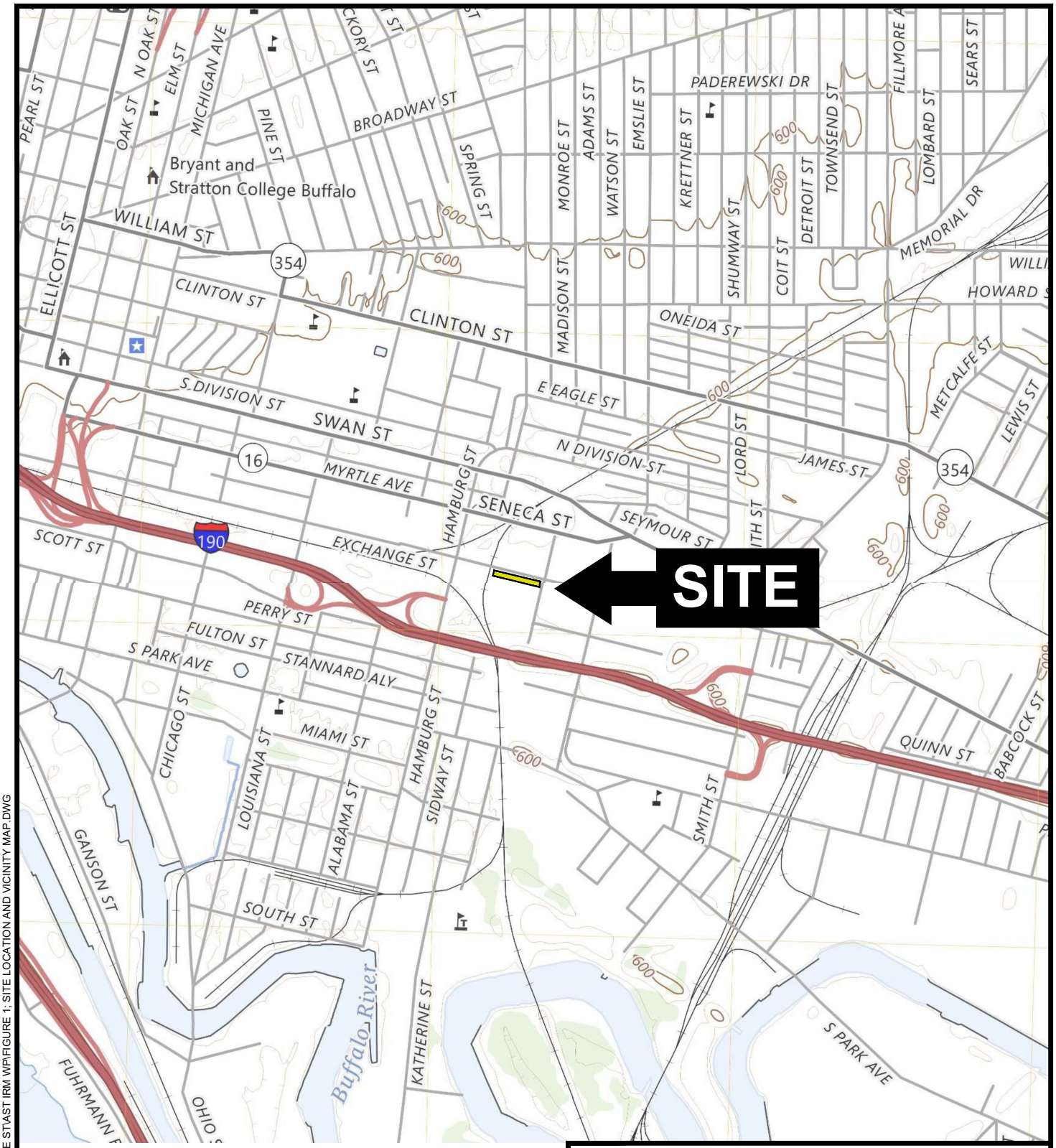
Michael A. Lesakowski
Vice President, Principal Scientist, Co-Operations Manager

Attachments: Figure 1 – Site Location and Vicinity Map
Figure 2 – Site Plan (Aerial) with AST Location
Attachment 1 – Community Air Monitoring Plan

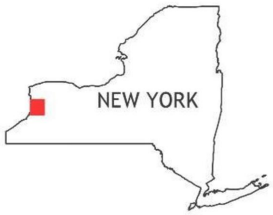
ec: Andrew Crossed, PG Larkinville, LLC
Robert Murray, Harris Beach PLLC
Andrea Caprio, NYSDEC
Gregory Scholand, Esq., NYSDEC
Sara Bogardus, NYSDOH
Stephen Lawrence, NYSDOH
Kari Pollard, NYSDOH
Chelsea Kanaley, Roux

FIGURES

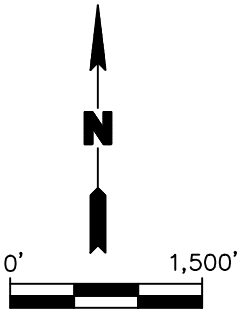
1. Site Location and Vicinity Map
2. Site Plan (Aerial) with AST Location



QUADRANGLE LOCATION



SOURCE:
USGS, 2023, BUFFALO, NY
7.5 MINUTE TOPOGRAPHIC QUADRANGLE



Title:

SITE LOCATION AND VICINITY MAP

IRM WORK PLAN FOR AST REMOVAL

619 EXCHANGE STREET SITE (C915403)
BUFFALO, NEW YORK

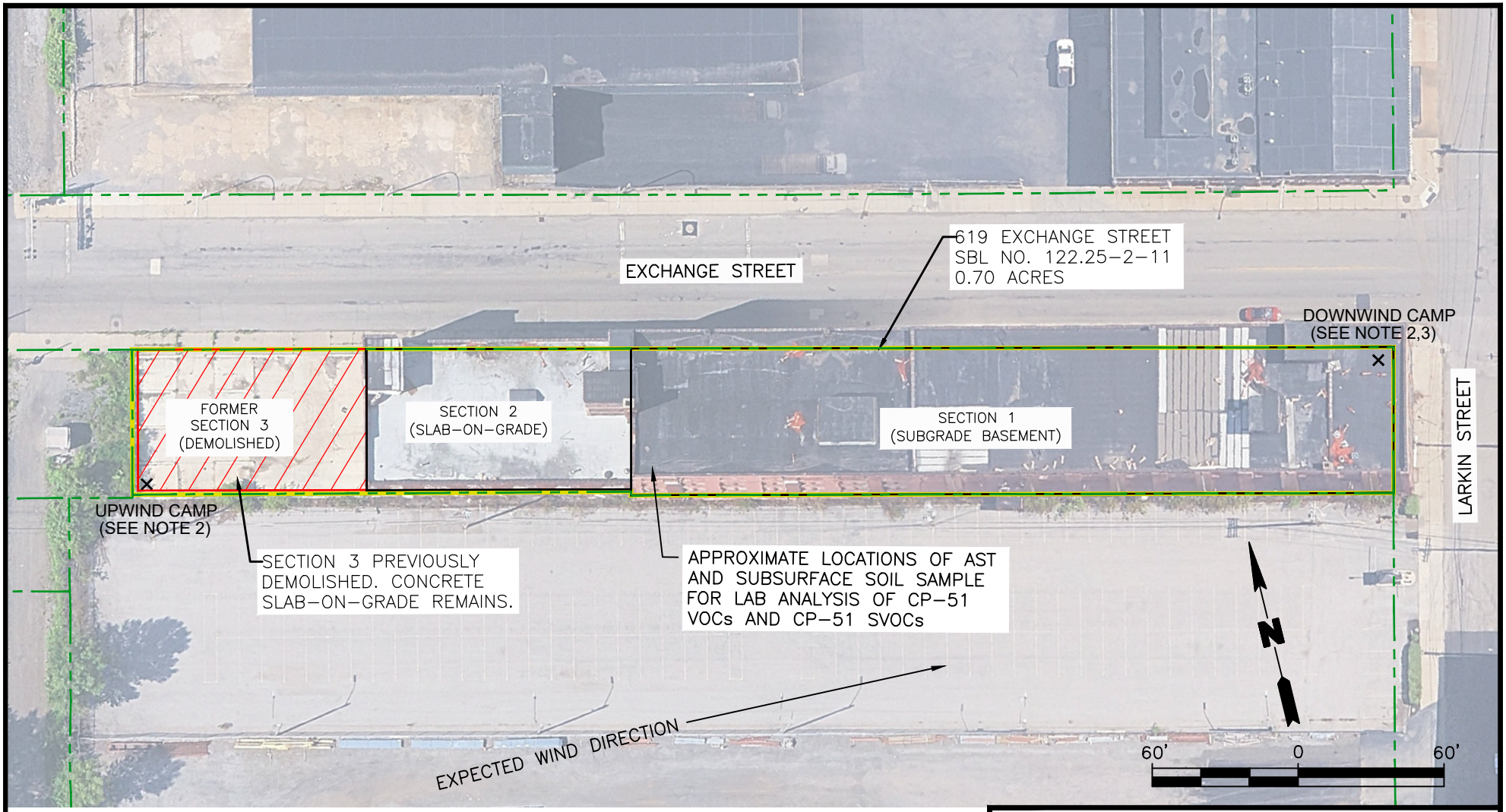
Prepared for:

PG LARKINVILLE, LLC

ROUX	Compiled by: CNK	Date: OCTOBER 2025	FIGURE 1
	Prepared by: CNK	Scale: AS SHOWN	
	Project Mgr: BWM	Project: 4374.0004B000	
	File: FIGURE 1; SITE LOCATION AND VICINITY MAP.DWG		

F:\CAD\0-ROUX\PARK GROVE REALTY\619 EXCHANGE ST\AST IRM WP\FIGURE 1; SITE LOCATION AND VICINITY MAP.DWG

F:\CAD\0-ROUX\PARK GROVE REALTY\619 EXCHANGE ST\AST IRM WP\FIGURE 2; SITE PLAN WITH AST LOCATION.DWG



LEGEND

- BCP SITE BOUNDARY
- PARCEL BOUNDARY
- BUILDING OUTLINE
- DEMOLISHED BUILDING SECTION
- CAMP × COMMUNITY AIR MONITORING LOCATION

NOTE:
1. IMAGE SOURCE GOOGLE EARTH 2024.
2. ACTUAL CAMP MONITORING LOCATIONS WILL BE DETERMINED IN THE FIELD ON A DAILY BASIS BASED ON WIND DIRECTION.
3. THE DOWNWIND CAMP LOCATION WILL BE PREFERENTIALLY PLACED NEAR A DOWNWIND BUILDING ENTRANCE.

Title:

SITE PLAN (AERIAL) WITH AST LOCATION

IRM WORK PLAN FOR AST REMOVAL

619 EXCHANGE STREET SITE (C915403)
BUFFALO, NEW YORK

Prepared for:

PG LARKINVILLE, LLC

ROUX

Compiled by: CNK	Date: OCTOBER 2025	FIGURE
Prepared by: CNK	Scale: AS SHOWN	2
Project Mgr: BWM	Project: 4374.0004B000	
File: FIGURE 2; SITE PLAN WITH AST LOCATION.DWG		

ATTACHMENT 1

Community Air Monitoring Plan

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

Appendix 1B
Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.

2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.

3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:

(a) Objects to be measured: Dust, mists or aerosols;
(b) Measurement Ranges: 0.001 to 400 mg/m3 (1 to 400,000 :ug/m3);
(c) Precision (2-sigma) at constant temperature: +/- 10 :g/m3 for one second averaging; and +/- 1.5 g/m3 for sixty second averaging;
(d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
(e) Resolution: 0.1% of reading or 1g/m3, whichever is larger;
(f) Particle Size Range of Maximum Response: 0.1-10;
(g) Total Number of Data Points in Memory: 10,000;
(h) Logged Data: Each data point with average concentration, time/date and data point number
(i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
(j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
(k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
(l) Operating Temperature: -10 to 50^{o} C (14 to 122^{o} F);
(m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.

4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.

5. The action level will be established at 150 ug/m3 (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m3, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m3 above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m3 continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM10 at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

(a) Applying water on haul roads;
(b) Wetting equipment and excavation faces;
(c) Spraying water on buckets during excavation and dumping;
(d) Hauling materials in properly tarped or watertight containers;
(e) Restricting vehicle speeds to 10 mph;
(f) Covering excavated areas and material after excavation activity ceases; and
(g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m3 action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.