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Memorandum

To: Andrew Prophete (National Grid NY)

From: Brian Skelly

Copy to: Richard Dana and R. Scott Deyette (NYSDEC) Chris Schroer (EA Engineering) Andrew Rizk (Louis Berger) Stephanie Selmer (NYSDOH) Dave Boram and Thor Helgason (de maximis) Ted Leissing (National Grid NY) Shail Pandya (AECOM) Ronell Marshall and Clayton John (GEI Consultants, Inc.)

Date: March 25, 2013

Regarding: Weekly Community Air Monitoring Report Clifton Former MGP Site - Operable Unit 2 (OU-2) March 16, 2013 through March 22, 2013

Dear Andrew:

This report includes a summary of data collected during implementation of the Community Air Monitoring Plan (CAMP) at the Clifton Former MGP Site Operable Unit 2 (OU-2) in Staten Island, New York. Data collected are discussed in relation to remediation activities that occurred between March 16, 2013 and March 22, 2013.

There were no fifteen-minute exceedances of the Total Volatile Organic Compounds (TVOC), Particulate Matter (PM-10) [dust], or odor action levels associated with ground intrusive site activities during this reporting period. The tables and figures accompanying this report summarize air monitoring results related to the action levels described by the CAMP Work Plan (AECOM, 2011 and GEI, 2012).

The following information is summarized in this report:

- Site construction activities
- Daily maximum 15-minute average concentrations of TVOC and PM-10 (dust) at each fixed station
- Elevated concentrations (if any)
- Meteorological data

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Site Construction Activities

Construction activities during this reporting period included:

- Disassembled Temporary Fabric Structure (TFS)
- Disassembled waste water treatment plant in OU1
- Emptied waste drums into tarped roll off dumpster
- Fueled construction Vehicles with fuel truck onsite
- Installed NAPL recovery wells
- Installed perimeter fence around OU2
- Removed construction vehicle offsite via flatbed truck
- Cut jersey barriers using circular saw
- Removed jersey barriers along Willow Avenue
- Removed jersey barriers along Bay Street
- Stockpiled former perimeter fence
- Relocated CAMP unit FAM#4

Data collection

Real-time fixed station monitoring for TVOC and PM-10 (dust) was performed on the OU-2 site perimeter at six locations (FAM#1 through FAM#6. Four AirLogics Classic stations equipped with gas chromatographs (GCs) were operated at FAM#2, FAM#3, FAM#4, and FAM#5 and two AirLogics Light stations were operated at FAM#1 and FAM#6.

Table 1 summarizes the target concentrations for action levels and Site Conditions described by the CAMP. Table 2 provides a daily summary of maximum fifteen-minute average ambient air concentrations from each station. The daily reports appended to this report depict more detailed and time-specific comparison of upwind and downwind measurements and site activities that is needed to determine the Site Condition.

Upwind and downwind ambient air verification samples were collected on March 20, 2013. Meteorological data collected at the on-site weather station are included in this report as Figures 1 through 4 which show a directional wind rose for the period and temperature, relative humidity, and wind speed time series for the period.

If you have any questions regarding the information in this report, please contact me.

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References

AECOM (2011). Appendix A of CERP Community Air Monitoring Plan (CAMP) Former Manufactured Gas Plant Operable Unit - 2 Remediation. Clifton, New York. August.

GEI Consultants, Inc (2012). Community Air Monitoring Plan: Clifton Former Manufactured Gas Plant Site – Operable Unit 2, Borough of Staten Island, New York. February.

New York State Department of Environmental Conservation (2010). DER-10 / Technical Guidance for Site Remediation and Investigation. Washington: Division of Environmental Remediation, December. Appendix 1-A. May.

Table 1 - Action Levels and Site Conditions Community Air Monitoring Program Clifton Former MGP Site Operable Unit 2 Borough of Staten Island, New York

	Alert Level	Action Level	Site Condition 1	Site Condition 2	Site Condition 3
TVOC (15-minute)	3.7 ppm	5.0 ppm	< 3.7 ppm	≥ 3.7 ppm, < 5.0 ppm	≥ 5.0 ppm
TVOC (1-minute)	NA	25 ppm	< 25 ppm	NA	≥ 25 ppm
PM-10 (15-minute)	100 ug/m ³	150 ug/m ³	< 100 ug/m ³	≥ 100 ug/m ³ , < 150 ug/m ³	≥ 150 ug/m ³
Odor (15-minute)	Odors / Complaints	NA	No odors	NA	3 (n-butanol)
HCN (15-minute)	Visual Detection	NA	< 0.6 ppm	≥ 0.6 ppm (4-gas meter)	≥ 0.6 ppm (Draeger tube)
Naphthalene (15-minute)	NA	NA	< 440 ug/m ³	≥ 330 ug/m ³ , < 440 ug/m ³	≥ 440 ug/m ³

Notes:

¹ Alert Levels are not established by the NYSDOH or NYSDEC and are internally established concentration levels for total volatile organic compounds. Alert Levels are set below the levels established by the NYSDOH so that actions can be taken prior to exceeding a NYSDOH threshold. An Alert Level serves as a screening tool to trigger contingent measures if necessary, to assist in minimizing off-site transport of contaminants during remedial activities

² Response Levels and Action Levels are not defined in Appendix 1A of the New York State Department of Environmental Conservation *DER-10 / Technical Guidance for Site Investigation and Remediation* (NYSDEC, 2010)

ug/m³ - micrograms per cubic meter

ppmv - parts per million by volume

TVOC - total volatile organic compounds

PM-10 - particulate matter (i.e. dust) less than 10 microns in diameter

HCN - hydrogen cyanide

NA - not applicable



Table 2. Daily Maximum 15-Minute Average Concentrations of TVOC and PM-10 Community Air Monitoring Program Clifton Former MGP Site Operable Unit 2 Borough of Staten Island, New York

			ΤV	OC			PM-10							
Date			(pp	om)			(ug/m ³)							
	FAM#1	FAM#2	FAM#3	FAM#4	FAM#5	FAM#6	FAM#1	FAM#2	FAM#3	FAM#4	FAM#5	FAM#6		
3/16/2013	0.4	0.2	0.1	ND	0.2	0.1	48	17	9	10	20	12		
3/17/2013	0.2	0.2	0.0	ND	0.2	0.2	42	18	10	13	21	11		
3/18/2013	0.2	0.1	0.1	0.1	0.3	0.1	18	19	3	12	13	10		
3/19/2013	0.0	0.5	0.1	0.1	0.4	0.1	37	13	4	11	14	13		
3/20/2013	0.0	0.3	0.2	0.1	0.2	0.1	28	11	3	5	19	41		
3/21/2013	0.0	0.3	0.1	0.4	0.2	0.2	44	13	4	6	12	31		
3/22/2013	0.0	0.4	0.1	0.3	1.0	0.3	32	15	2	7	19	34		
Average	0.1	0.3	0.1	0.2	0.4	0.2	36	15	5	9	17	22		
Maximum	0.4	0.5	0.2	0.4	1.0	0.3	48	19	10	13	21	41		

Notes:

FAM - fixed air monitoring station location

ug/m³ - micrograms per cubic meter

ppmv - parts per million by volume

TVOC - total volatile organic compounds

PM-10 - particulate matter (i.e. dust) less than 10 microns in diameter

ND: No Data recorded for TVOC at FAM#4 due to equipment malfunction



Figures 1-4 Meteorological Data Weekly Community Air Monitoring Report Clifton Former MGP Site Operable Unit 2 Borough of Staten Island, New York

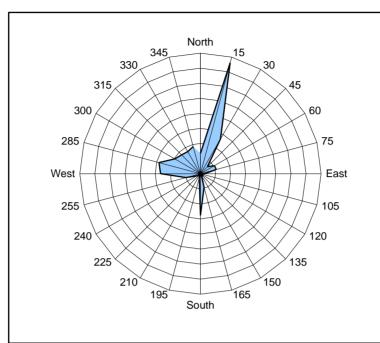


Figure 1. Wind rose for the period 03/16/13 through 03/22/13 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Wind direction data used to create the wind rose were calculated from 1-minute data.

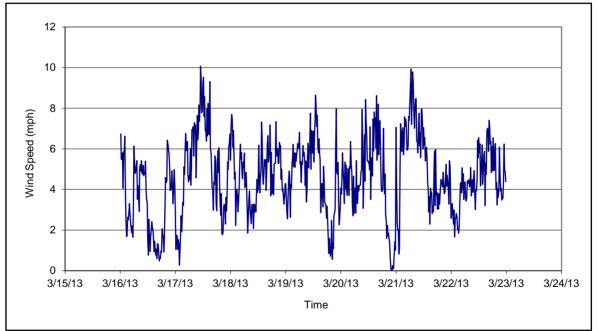


Figure 2. Wind speed for the period 03/16/13 through 03/22/13 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

Figures 1-4 Meteorological Data Weekly Community Air Monitoring Report Clifton Former MGP Site Operable Unit 2 Borough of Staten Island, New York

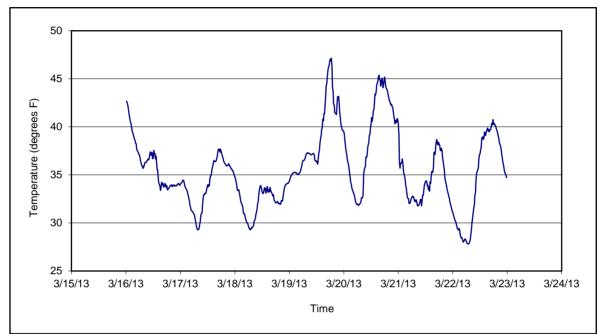


Figure 3. Temperature for the period 03/16/13 through 03/22/13 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

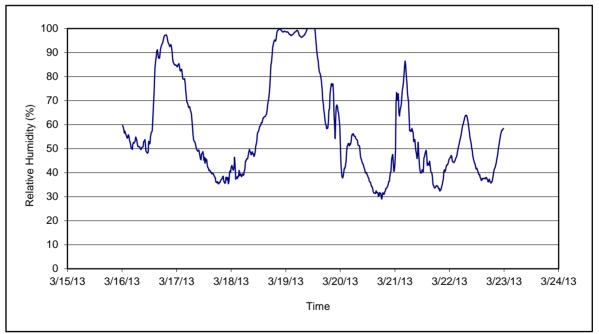


Figure 4. Relative humidity for the period 03/16/13 through 03/22/13 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

	System Op	erations									General Observations		
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					Installed	NAPL re	covery wells						
					Installed	perimete	er fence around Ol	J2					
					# of					5-Minute			
Date	Alert	Station	Start	End	15-min	Wind	Upwind/	Upwind		wind-Upwind	Site Condition	Site Activity During the Period	Actions Taken
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				ion Limit:			ug/m ³	3.7 ppm 5.0 ppm			- 25 ppm	- 3 (n-butanol scale)	
			Au			150	ug/m	5.0 ppm			25 ppm	3 (II-butalioi scale)	
Notes:									B1 4 6			· · ·	
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	System Op	arations			1						General Observations		
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					Emptied	waste d	rums into tarped ro	ll off dumpster					
					# of					5-Minute			
Date	Alert	Station	Start	End	15-min	Wind	Upwind/	Upwind		wind-Upwind	Site Condition	Site Activity During the Period	Actions Taken
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	System Ope	erations			General Observations											
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	System Op	erations									General Observations		
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	System Op	erations									General Observations					
		mpling Date	3/22/	/2013	General Weath	ner Cond	litions:									
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							(15-min)	TVOC (15-min))		TVOC (1-min)	Odor Intensity (15-min)				
				ert Limit:			ug/m ³	3.7 ppm			-					
			Acti	ion Limit:		150	ug/m ³	5.0 ppm			25 ppm	3 (n-butanol scale)				
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