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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: April 1, 2013

Regarding: Weekly Community Air Monitoring Report

Clifton Former MGP Site - Operable Unit 2 (OU-2)

March 23, 2013 through March 29, 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 23, 2013 to March 29, 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 waste water treatment plant in OU1
- Disassembled temporary perimeter fence
- 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
- Dismantled girder base support for TFS via cutting torch

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 Air Logics Classic stations equipped with gas chromatographs (GCs) were operated at FAM#2, FAM#3, FAM#4, and FAM#5 and two Air Logics 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.

On Friday March 22, 2013 at 3:33 pm to Monday, March 25, 2013 at 6:35 am, FAM#5 was shut down as requested by the client, National Grid. There was no data collected during this time period. No TVOC or PM10 exceedances were noted from adjacent stations.

On Thursday, March 25, 2013 at 5:30pm to Friday March 25, 2013 at 7:50am, FAM# 2 loss power due to a tripped circuit breaker. Limited data was recovered during this time period. De maximis was informed on the incident and Sevenson worked with the GEI Tech to remedy the problem.

Upwind and downwind ambient air verification samples were collected on March 27-28, 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/m³, < 150 ug/m³	≥ 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/m³, < 440 ug/m³	≥ 440 ug/m ³

Notes:

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



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)

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

			TV	ОС			PM-10						
Date			(pp	om)			(ug/m³)						
	FAM#1 FAM#2		FAM#3	FAM#4	FAM#5	FAM#6	FAM#1	FAM#2	FAM#3	FAM#4	FAM#5	FAM#6	
3/23/2013	0.0	0.3	0.0	0.3	ND	0.3	22	6	1	1	ND	19	
3/24/2013	0.0	0.3	0.3	0.4	ND	0.3	32	7	1	1	ND	13	
3/25/2013	0.0	0.4	0.1	0.4	0.2	0.9	32	12	15	22	56	24	
3/26/2013	0.2	0.5	0.1	0.3	0.2	4.0	32	13	6	9	8	15	
3/27/2013	0.5	0.3	0.1	0.2	0.1	2.7	22	6	2	5	88	7	
3/28/2013	0.4	0.4	0.2	0.2	0.2	2.9	28	7	1	3	12	6	
3/29/2013	0.2	0.4	0.1	0.2	0.2	1.5	33	13	1	2	87	6	
Average	0.2	0.4	0.1	0.3	0.2	1.8	29	9	4	6	50	13	
Maximum	0.5	0.5	0.3	0.4	0.2	4.0	33	13	15	22	88	24	

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 recoded for TVOC at FAM# 5 due to agreed shut down post instrusive work cessation



Figures 1-4. Meteorological Data Clifton Former MGP Site Clifton, NY

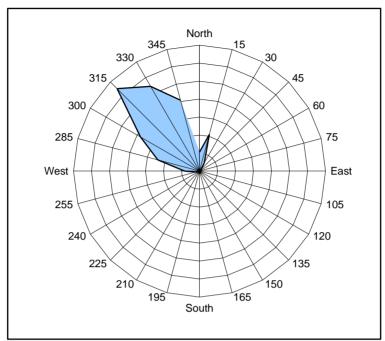


Figure 1. Wind rose for the period 03/23/13 through 03/29/13 collected at the Glen Cove Former MGP Site in Glen Cove, NY. Wind direction data used to create the wind rose were calculated from 15-minute averages.

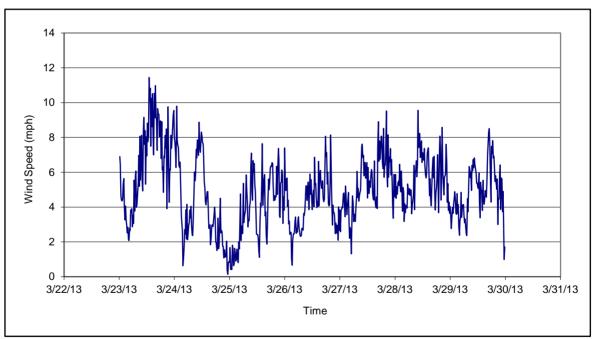


Figure 2. Wind speed for the period 03/23/13 through 03/29/13 collected at the Glen Cove Former MGP Site in Glen Cove,NY. Data are 15-minute averages.

Figures 1-4. Meteorological Data Clifton Former MGP Site Clifton, NY

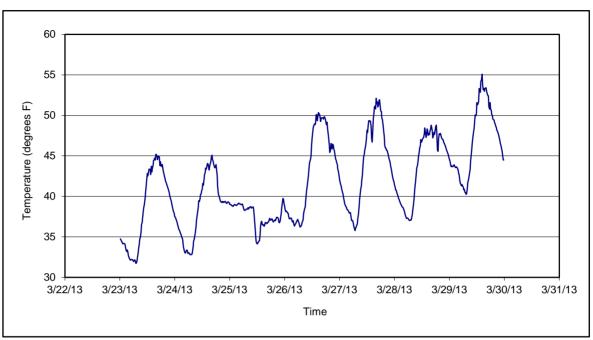


Figure 3. Temperature for the period 03/23/13 through 03/29/13 collected at the Glen Cove Former MGP Site in Glen Cove, NY. Data are 15-minute averages.

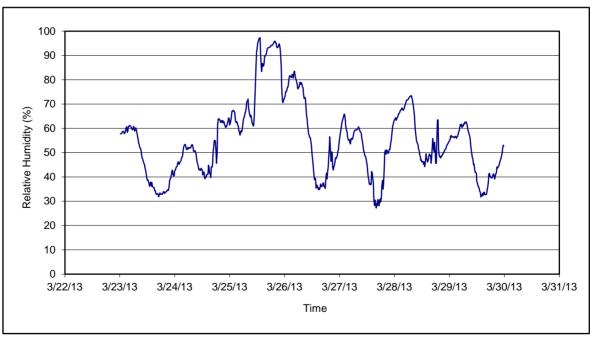


Figure 4. Relative humidity for the period 03/23/13 through 03/29/13 collected at the Glen Cove Former MGP Site in Glen Cove, NY. Data are 15-minute averages.

	System Op	erations			1	General Observations										
		mpling Date	3/25/	2013	General Weather	Conditio	ons:				General Observations					
		n Start Time					nd Snow - ~ 31°F -	~36°F								
		n Stop Time														
		s Monitored	2		General Descripti	on of Sit	e Activities:									
					Health & Sa											
	System	Calibrations	0	k		Continuous Air Monitoring										
	Т)	ime/Status)	0702-	-0900	Stockpiled former perimeter fence											
		•			Installed NA	APL reco	very wells									
					Disassembl	led waste	e water treatment p	plant in OU1								
					# of					Minute						
Date	Alert	Station	Start	End	15-min	Wind	Upwind/	Upwind		nd-Upwind	Site Condition	Site Activity During the Period	Actions Taken			
Date	Trigger	Otation	Time	Time	Periods	Dir.	Downwind	Station(s)	Concentration			(if applicable)	Actions Taken			
									Min**	Max**						
3/25/13	No exceedances												None taken			
Comments:								Į.								
						PM-10 (1		TVOC (15-min)			TVOC (1-min)	Odor Intensity (15-min)				
				ert Limit:		100 u		3.7 ppm			-	-				
			Acti	on Limit:	:	150 u	g/m³	5.0 ppm			25 ppm	3 (n-butanol scale)				
lotes:																
* Wind dire	ections are presented	d by octant (i.	.e. N, NE,	E, SE,	S, SW, W, NW).				PM-10 - pa	rticulate matte	er (i.e. dust) less than 10 microns	s in diameter				
** Upwind	minus downwind cor	ncentrations a							TVOC - tot	al volatile orga	anic compounds					
	ed Air Monitoring stat															
ug/m³ - mi	crograms per cubic r	neter							NA - not ap	plicable						
ppmv - pai	rts per million by volu	ime							ND - no da	ta available		Field Representative:	R. Marshall			
												Date:	3/25/2013			



	System Or	erations									General Observations				
		ampling Date	3/26/	2013	General Weather	Condition	ons:								
	Syste	m Start Time	conti	nuous	Partly Cloud	ly - ~ 36	6°F - ~50°F								
		m Stop Time		nuous											
	Total H	rs Monitored	2	:4	General Descripti										
			_		Health & Sa										
		Calibrations)k	Continuous										
	(Time/Status)	0801	-0953	Removed and Stockpiled former perimeter fence Installed NAPL recovery wells										
					Installed INAT_Lectory wills Disassembled waste water treatment plant in OU1										
						Disassembled waste water treatment plant in OU1 Cutting torch being used on Ibeam base structure of former TFS									
									15-	Minute					
Date	Alert	Station	Start	End	# of 15-min	Wind	Upwind/	Upwind	Downw	ind-Upwind	Site Condition	Site Activity During the Period	Actions Taken		
Date	Trigger	Station	Time	Time	Periods	Dir.	Downwind	Station(s)		entration	Site Condition	(if applicable)	Actions ratem		
									Min**	Max**					
3/26/13	TVOC	FAM#6	6:56	6:58	3	West	CW/UW	N/A	N/A	N/A	none	No Site activity taken place dureing this time	Offsite source, No Action Taken		
-															
		1													
												<u> </u>			
		1													
		1													
Comments:	1	ı			1		1	l l				<u></u>			
							15-min)	TVOC (15-min)			TVOC (1-min)	Odor Intensity (15-min)			
				ert Limit: ion Limit:		100 u		3.7 ppm 5.0 ppm			- 25 ppm	3 (n-butanol scale)			
			Acti	OH LIMIL		130 0	ag/111	5.0 ppm			20 ррш	3 (II-butafloi scale)			
Notes:	ections are presente	d by optort /:	0 N N T	E 0E	C C/A/ /A/ A//A/				DM 10 ~	articulate matte	er (i.e. dust) less than 10 microns	in diameter			
	ections are presente minus downwind co										er (i.e. dust) less than 10 microns anic compounds	s in diametel			
	ed Air Monitoring sta		ui o a uiiit	Specific	oonipanioni.					a voianie orga	ano compounds				
	crograms per cubic								NA - not a	pplicable					
	rts per million by vol									ita available		Field Representative:	C. John		
												Date: 3/26/2013			
												-	D 4 -4 4		



	System Op	erations									General Observations					
	Sa	mpling Date			General Weather											
	System	n Start Time	contir	nuous	Clear - ~ 36	6°F - ~50)°F									
		n Stop Time														
	Total Hi	rs Monitored	2	4	General Descripti											
					Health & Sa	afety Me	eting				, equipment, and iron girders on					
	System	Calibrations	C	k	Continuous	Air Mon	nitoring		Excavator cleared and leveled gound where well installation was previously taking place.							
	(1	Time/Status)	0801	-0953	Removed a	nd Stoc	kpiled former perim	eter fence								
					Installed NA	APL reco	overy wells									
					Disassembl	led wast	e water treatment p	plant in OU1								
					Cutting torc	h being	used on Ibeam bas	e structure of former TFS								
					11 - 4				15-	Minute						
. .	Alert	0, 1	Start	End	# of 15-min	Wind	Upwind/	Upwind	Downw	ind-Upwind	Site Condition	Site Activity During the Period	Actions Taken			
Date	Trigger	Station	Time	Time	Periods	Dir.	Downwind	Station(s)	Cond	entration	Site Condition	(if applicable)	Actions Taken			
					Periods				Min**	Max**						
3/27/13	No Exceedances												Non Taken			
					1											
Comments:		ı	1	1												
						PM-10 (15-min)	TVOC (15-min)			TVOC (1-min)	Odor Intensity (15-min)				
			Al	ert Limit:		100 u		3.7 ppm			-					
				on Limit:		150 u		5.0 ppm			25 ppm	3 (n-butanol scale)				
Notes:							-	FF***			* 1.1					
	ections are presented	d by octors /:	0 NI NIT	E 0E 0	C C/M/ /M/ N//M/				DM 10 ~	articulata matta	er (i.e. dust) less than 10 microns	in diameter				
	ections are presented minus downwind cor										er (i.e. dust) less than 10 microns anic compounds	s in diameter				
			are a time	specific	companson.				1 VOC - 10	iai voiaille orga	anic compounds					
	ed Air Monitoring state crograms per cubic r								NIA not -	nnlinahla						
									NA - not a			Field Person 1 11	O. John			
ppmv - pai	ts per million by volu	ıme							ND - no da	ata available		Field Representative:	C. John			
l												Date:	3/27/2013			



	System Op	erations									General Observations					
	Sa	mpling Date	3/28/	2013	General Weather	Condition	ons:									
		n Start Time			Clear - ~ 44	ŀ°F - ~47	7°F									
		n Stop Time		nuous												
	Total H	rs Monitored	2	4	General Descripti											
					Health & Sa				Waste material loaded out from roller container to tarped dump truck							
		Calibrations		k	Continuous				Front end loader leveled roadways							
	(1	Time/Status)	0801	-1032			kpiled former perim	eter fence	Roll Gate installed at eastern entrance to OU-2							
					Installed NA											
					Disassembl	led wast	te water treatment p	plant in OU1								
	1								15	Minute		1				
	Alert	Start Fod # 01 Wind Upwind/ Upwind Downwind Upwind							Site Activity During the Period							
Date	Trigger	Station	Time	Time	15-min	Dir.	Downwind	Station(s)	Concentration		Site Condition	(if applicable)	Actions Taken			
	95		-		Periods				Min**	Max**		(паррилали)				
3/28/13	No Exceedances												Non Taken			
Comments:																
						DM 40 /	15-min)	T)/00 /45i)			T1/00 (4 i)	Oden leterality (45 min)				
			Δ1	ant Linaite		100 u		TVOC (15-min)			TVOC (1-min)	Odor Intensity (15-min)				
				ert Limit: on Limit:		150 u		3.7 ppm 5.0 ppm			- 25 ppm	3 (n-butanol scale)				
 			ACII	OH LIHIL	•	150 0	ag/111	5.0 ppm			20 ρριιι	3 (II-butanoi scale)				
Notes:	antiona are pres t -	d bu ontart /:	- NI NI	г сг .	C CIA/ IA/ NIIA/I				DM 10	untiaculata ma-++-	or (i.e. duet) less than 10	in diameter				
	ections are presented minus downwind coi									PM-10 - particulate matter (i.e. dust) less than 10 microns in diameter TVOC - total volatile organic compounds						
	ed Air Monitoring stat		are a uille	s specific	companson.				1 400 - 10	ai voiatile orga	and compounds					
	crograms per cubic r								NA - not a	nnlicable						
	rts per million by volu									ita available		Field Representative: C. John				
рршу - ра	no per minion by voic								110 00	ita available		Date:	3/28/2013			
1												Dutc	0/20/2010			



	System Op	erations									General Observations						
		mpling Date	3/29/	2013	General Weather	Conditio	ons:										
	Systen	n Start Time	contir	nuous	Clear - ~ 40	°F - ~53	s°F										
		n Stop Time	contir	nuous													
	Total Hr	rs Monitored	2	4	General Descripti												
										Waste material loaded out from roller container to tarped dump truck							
		Calibrations		k						Front end loader leveled roadways							
	T)	Time/Status)	0737	-0851			kpiled former perim	eter fence									
					Installed NA												
					Disassembl	ed wast	e water treatment p	plant in OU1									
-	1	l					I		15	Minute		1					
	Alert		Start	End	# of	Wind	Upwind/	Upwind		ind-Upwind		Site Activity During the Period					
Date	Trigger	Station	Time	Time	15-min	Dir.	Downwind	Station(s)	Concentration		Site Condition	(if applicable)	Actions Taken				
	ggo.				Periods	J	20111111111	Gidaion(o)	Min**	Max**		(ii applicable)					
3/29/13	No Exceedances												Non Taken				
Comments:	ı	l			1		ı										
							15-min)	TVOC (15-min)			TVOC (1-min)	Odor Intensity (15-min)					
1				ert Limit:		100 u		3.7 ppm			-	-					
			Acti	on Limit:		150 u	g/m³	5.0 ppm			25 ppm	3 (n-butanol scale)					
Notes:																	
	ections are presented										er (i.e. dust) less than 10 microns	in diameter					
	minus downwind cor		are a time	e specific	comparison.				TVOC - tot	al volatile orga	inic compounds						
	ed Air Monitoring stat																
	crograms per cubic r								NA - not a								
ppmv - pai	rts per million by volu	ıme							ND - no da	ta available		Field Representative:	C. John				
												Date:	3/29/2013				

