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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: July 25, 2012

Regarding: Weekly Community Air Monitoring Report

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

July 14, 2012 through July 20, 2012

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 July 14, 2012 and July 20, 2012.

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. There were some elevated levels of dust measured that were attributed to vehicular traffic moving along the terrain. 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:

- Excavated inside Temporary Fabric Structure (TFS)
- Backfilled in TFS
- Loaded out soil off site via tarped dump trucks
- Deconned load out dump trucks
- Received delivery of roll off dumpster
- Excavated South of TFS
- Operated hoe-ram attachment inside TFS
- Operated odor suppressant along East side of TFS and along Willow Avenue
- Operated rock crusher
- Transported clean soil into TFS
- Operated hoe-ram to break up concrete slab

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 July 18, 2012. 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.

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.

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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		
7/14/2012	0.0	0.1	0.2	0.1	0.1	0.0	52	27	3	3	1	40		
7/15/2012	0.1	0.0	ND	0.0	ND	0.0	47	31	4	4	49	38		
7/16/2012	0.1	0.1	0.1*	0.1	0.9*	0.0	72	62	9	6	0	58		
7/17/2012	0.7	0.4	0.2	0.4	0.2	0.2	73	36	9	23	70	107		
7/18/2012	0.1	0.1	0.1	0.5	0.1	0.9	109	64	8	22	35	113		
7/19/2012	0.1	0.0	0.3	0.2	0.1	0.2	57	44	4	28	34	63		
7/20/2012	0.0	0.0	0.5	0.1	0.1	0.0	52	23	3	24	13	19		
Average	0.1	0.1	0.2	0.2	0.1	0.2	66	41	6	16	29	63		
Maximum	0.7	0.4	0.5	0.5	0.2	0.9	109	64	9	28	70	113		

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 available

*Due to equipment malfunction there is no recordable TVOC data for FAM#3 from 00:10 on 7/15/2012 - 7:41 on 7/16/2012.

*Due to equipment malfunction there is no recordable TVOC data for FAM#5 from 10:22 on 7/15/2012 - 7:15 on 7/16/2012.

*The listed measurements do not reflect the above mentioned time periods.



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

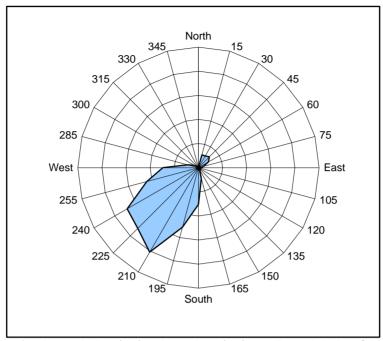


Figure 1. Wind rose for the period 07/14/12 through 07/20/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Wind direction data used to create the wind rose were calculated from 1-minute data.

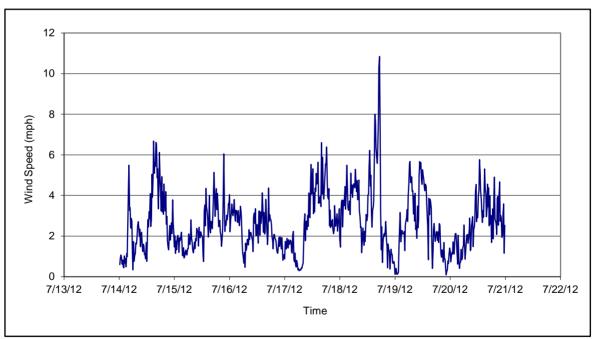


Figure 2. Wind speed for the period 07/14/12 through 07/20/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

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

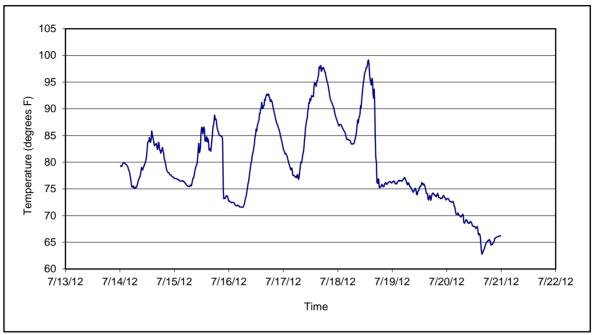


Figure 3. Temperature for the period 07/14/12 through 07/20/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

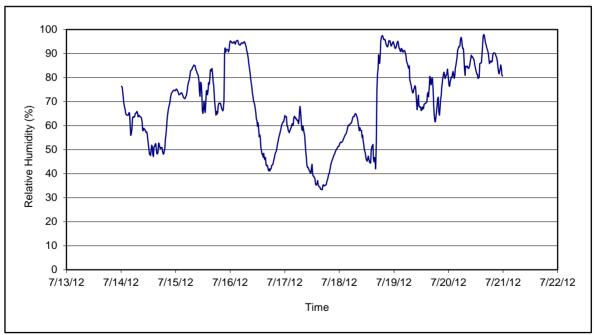


Figure 4. Relative humidity for the period 07/14/12 through 07/20/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

	Syste	m Operation	ıs								General Observations				
		mpling Date	7/16/	/2012	General W	eather C	onditions:								
		n Start Time	contir		Clear ~7										
		n Stop Time		nuous											
	,	s Monitored		24	General De	escription	of Site Activities:								
		0 111011110100	_		Health &										
	System	Calibrations	C)k	Continuo										
		ime/Status)	0712			d hoe-ram attachment inside TFS Transported clean soil into TFS									
	('	inic/Otatas)	07.12	0021	Excavate			, 11 0	Backfilled in		11 0				
							ut dump trucks		Operated ro						
							n site via tarped du	mntrucks	Backfilled in						
				1		1	l site via tarpea aai	I I I I I I I I I I I I I I I I I I I		Minute					
	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)		entration	Site Condition	(if applicable)	Actions Taken		
	rrigger		Tillie	Tillie	Periods	Dii.	Downwind	Otation(3)	Min**	Max**		(ii applicable)			
7/16/2012				l		1				I			None taken		
.,10/2012				l -					+				140110 takon		
				l	1	1			+						
					1				+						
									-						
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					1	1			+						
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					1	1			+						
									+						
Comments:				l		1	l .	1	1						
						DM 40	(45)	TV00 (45			1/00 //	0.1-1-1			
							(15-min)	TVOC (15-m	iin)	I	VOC (1-min)	Odor Intensity (15-min)			
	Alert Limit: 100 ug/m ³ Action Limit: 150 ug/m ³							3.7 ppm			-	-			
			Act	ion Limit:		150	ug/m ⁻	5.0 ppm			25 ppm	3 (n-butanol scale)			
Notes:															
		e presented l									(i.e. dust) less than 10 mi	crons in diameter			
		wnwind conc			me specific o	comparis	on.			ıl volatile organ	ic compounds				
		nitoring static		n					NA - not app						
		per cubic me							ND - no dat	a available		Field Representative:	R. Marshall		
ppmv - pa	arts per mi	llion by volum	ne									Date:	7/16/2012		
													Page 1 of _1_		



	Syste	m Operation	s			General Observations										
		mpling Date	7/17/		General We											
		m Start Time	contir		Clear ~77	7°F- ~97°	F									
		m Stop Time	contir													
	Total Hr	rs Monitored	2	4			of Site Activities:									
					Health &											
		Calibrations)k	Continuo			Delivery of rolloff dumpster								
	(7	Time/Status)	0645	-0856			attachment inside	ΓFS	Backfilled in TFS							
					Excavate				Operated ro							
							t dump trucks		Backfilled in							
					Load out	soil from	site via tarped dun	nptrucks		•	along Willow Avenue					
			. .		# of					Minute		80 4 4 5 5 4 4 5 4 4				
Date	Alert	Station	Start	End	15-min			Site Condition	Site Activity During the Period	Actions Taken						
	Trigger		Time	e Time	Periods	Dir.	Downwind	Station(s)	Min**	Max**		(if applicable)				
									IVIIII	iviax		Vehicle Traffic				
7/17/2012	PM-10	FAM#6	13:40	13:53	14	wsw	CW/UW	N/A	101 107		1	Additional water was sprayed	Notified construction manager			
Comments:	l :	l l			<u> </u>				1							
							15-min)	TVOC (15-mi	in)	T\	VOC (1-min)	Odor Intensity (15-min)				
				ert Limit:	9						-	-				
			Acti	ion Limit:		150	ug/m³	5.0 ppm			25 ppm	3 (n-butanol scale)				
** Upwin	d minus do	re presented wnwind conc	entrations	s are a ti					TVOC - tota	volatile organi	(i.e. dust) less than 10 mic c compounds	crons in diameter				
		nitoring statio		n					NA - not app							
	ug/m³ - micrograms per cubic meter									ND - no data available Field Representative: R. Marshall						



ppmv - parts per million by volume

Date:

7/17/2012

	System O	perations			General Observations									
		ampling Date		/2012	General We									
		m Start Time m Stop Time	conti		Clear ~82	2°F- ~10′	l°F							
		rs Monitored		24	General De	scription	of Site Activities:							
					Health &									
	,	Calibrations)k	Continuous Air Monitoring Operated hoe-ram attachment inside TFS									
	(Time/Status)	0648	-0841				IFS	Backfilled in Operated ro					
					Excavated inside TFS Deconned load out dump trucks				Backfilled in					
					Load out soil from site via tarped dumptrucks					dor supressant	along Willow Avenue			
Date	Alert Trigger	Station	Start Time	End Time	# of 15-min Periods	Wind Dir.	Upwind/ Downwind	Upwind Station(s)	15-Minute Downwind-Upwind Concentration Min** Max**		Site Condition	Site Activity During the Period (if applicable)	Actions Taken	
7/18/2012	PM-10	FAM#1	11:36	11:45	30	SW	CW/UW	N/A	100 103		1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#1	12:12	12:14	3	SSW	CW	N/A	100	101	1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#1	12:21	12:47	27	SSE	DW	FAM#4	83	87	1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#1	12:50	12:50	1	SSE	DW	FAM#4	83	83	1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#1	13:21	13:22	2	S	DW/CW	FAM#4	84	84	1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#1	14:08	14:11	2	SSE	DW/CW	FAM#4	84	86	1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#1	14:29	14:32	4	SSE	DW	FAM#4	100	104	2	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#6	13:11	13:19	9	SSW	CW/UW	N/A	100	113	1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
7/18/2012	PM-10	FAM#6	13:22	13:22	1	S	CW	N/A	100	100	1	Construction vehicles moving along the terrain	Notified construction manager Additional water was sprayed	
													-	
Comments:											<u> </u>			
						PM-10 (15-min)	TVOC (15-m	nin)	TV	/OC (1-min)	Odor Intensity (15-min)		
				lert Limit:	100 ug/m ³			3.7 ppm 5.0 ppm	om -			3 (n-butanol scale)		
	ections are preser									rticulate matter	i.e. dust) less than 10 mi	crons in diameter		

Upwind minus downwind concentrations are a time specific comparison.

FAM - Fixed Air Monitoring station location

ppmv - parts per million by volume

ug/m³ - micrograms per cubic meter

TVOC - total volatile organic compounds

NA - not applicable

ND - no data available Field Representative: R. Marshall

7/18/2012



	System Op	orations									General Observations		
		ampling Date	7/19	/2012	General We	eather Co	anditions:				General Observations		
		m Start Time		nuous	Overcast								
		m Stop Time		nuous	0.0.000								
		Irs Monitored		24	General De	scription	of Site Activities:						
	- Ottain		-	- '	Health & Safety Meeting					TFS			
	System	Calibrations	(Ok	Continuo				Operated ro				
		Time/Status)		-0915	Excavate				Excavated S				
	`	, ,					it dump trucks						
							site via tarped dur	nptrucks					
									15-	Minute			
_	Alert		Start	End	# of	Wind	Upwind/	Upwind	Downwind-Upwind Concentration Site Condition			Site Activity During the Period	
Date	Trigger	Station	Time	Time	15-min	Dir.	Downwind	Station(s)			Site Condition	(if applicable)	Actions Taken
	33				Periods			(-)	Min**	Max**		(111)	
7/19/2012	No Exceedances	l l											None taken
Comments:					•								
			_				(15-min)	TVOC (15-mi	in)	Т	VOC (1-min)	Odor Intensity (15-min)	
			Α	lert Limit:		100 (3.7 ppm			-	-	
			Act	tion Limit:		150 ו	ug/m³	5.0 ppm			25 ppm	3 (n-butanol scale)	
Notes:			_										
	irections are presented	l by octant (i.e	. N. NE.	E. SE. S.	SW. W. NW	/).			PM-10 - par	ticulate matter	(i.e. dust) less than 10 mi	crons in diameter	
	d minus downwind con					,-					nic compounds		
	xed Air Monitoring stat			.,					NA - not app		· · · · · premier		
	nicrograms per cubic m								ND - no data			Field Representative:	C. John
	arts per million by volu											Date:	7/19/2012
PP14 P	and por million by void											Duito.	., .5/2012



	System O	perations									General Observations					
-		mpling Date	7/20/	/2012	General We	eather Co	onditions:									
	Syster	m Start Time	contin	nuous	Clear ~78	3°F- ~93°	°F									
	Syste	m Stop Time	contin	nuous												
	Total H	rs Monitored	2	24	General De	Description of Site Activities:										
					Health &	Safety M	leeting									
	System	Calibrations	C	Ok	Continuo	us Air Mo	onitoring		Operated odor suppressant along East side of TFS							
	(Time/Status)	0745	-0901	Operated	hoe-ram	n attachment inside	TFS	Transported	Transported clean soil into TFS Backfilled in TFS						
					Excavate	d inside	TFS		Backfilled in							
					Deconne	d load ou	ut dump trucks		Operated ro							
					Load out	soil from	site via tarped dum	ptrucks	Backfilled in	Backfilled in TFS						
					# of				15-	Minute						
Date	Alert	Station	Start	End	# 01 15-min	Wind Dir.	Upwind/	Upwind		nd-Upwind	Site Condition	Site Activity During the Period	Actions Taken			
	Trigger		Time	Time	Periods	DIF.	Downwind	Station(s)	Min**	entration Max**		(if applicable)				
7/20/2012	No Exceedances												None taken			
Comments:		l I		1	<u> </u>		l l		1		l l					
							(15-min)	TVOC (15-m	in)	T	VOC (1-min)	Odor Intensity (15-min)				
	Alert Limit: 100 ug/m³ Action Limit: 150 ug/m³							3.7 ppm			-	-				
			Act	ion Limit:		150	ug/m	5.0 ppm			25 ppm	3 (n-butanol scale)				
Notes:																
	rections are presen										(i.e. dust) less than 10 mic	rons in diameter				
	d minus downwind o			me specif	fic compariso	on.				l volatile organi	ic compounds					
	xed Air Monitoring s		n						NA - not app							
ua/m³ - r	nicrograms per cubi	c meter							ND - no data available Field Representative: R. Marshall							
-	arts per million by v								IND - IIO date	avallable		Date:	7/20/2012			

