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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: August 24, 2012

Regarding: Weekly Community Air Monitoring Report

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

August 11, 2012 through August 17, 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 August 11, 2012 and August 17, 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. 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 in Temporary Fabric Structure (TFS)
- Cleaned Willow Avenue street using sweeper attachment
- Deconned load out dump trucks
- Installed vents on South side of TFS
- Installed and leveled gravel roadway near exit at 25 Willow Avenue
- Load out soil from site via tarped dumptrucks
- Mobilized and installed TIGG units
- Operated hoe-ram in TFS
- Operated odor and dust suppressant systems
- Received delivery of clean backfill
- Relocated frac tanks
- Tarped dump trucks
- Transported clean backfill into TFS

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 August 15, 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.

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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		
8/11/2012	0.1	0.0	0.0	0.0	0.0	0.0	60	22	0	5	56	31		
8/12/2012	0.1	0.0	0.0	0.0	0.0	0.1	64	19	0	1	14	26		
8/13/2012	0.2	0.1	0.1	0.1	0.1	0.0	34	17	5	4	21	23		
8/14/2012	1.3	0.6	0.9	8.0	0.4	0.4	61	25	5	11	35	0		
8/15/2012	0.1	0.1	0.1	0.4	0.2	0.1	74	20	8	89	67	1		
8/16/2012	0.1	0.1	0.4	0.1	0.1	0.1	47	22	5	17	40	1		
8/17/2012	0.1	0.1	0.2	0.4	0.2	0.1	70	24	5	11	94	0		
Average	0.3	0.2	0.3	0.3	0.2	0.1	59	21	4	20	47	12		
Maximum	1.3	0.6	0.9	0.8	0.4	0.4	74	25	8	89	94	31		

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



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

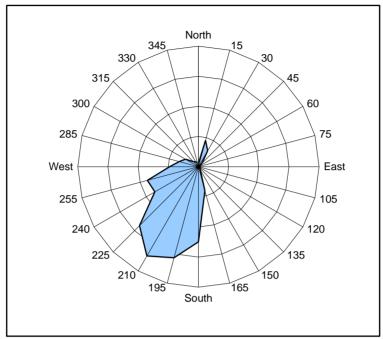


Figure 1. Wind rose for the period 08/11/12 through 08/17/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Wind direction data used to create the wind rose were calculated from 1-minute data.

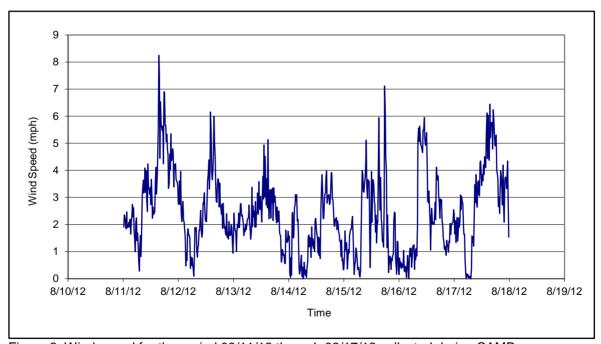


Figure 2. Wind speed for the period 08/11/12 through 08/17/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

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

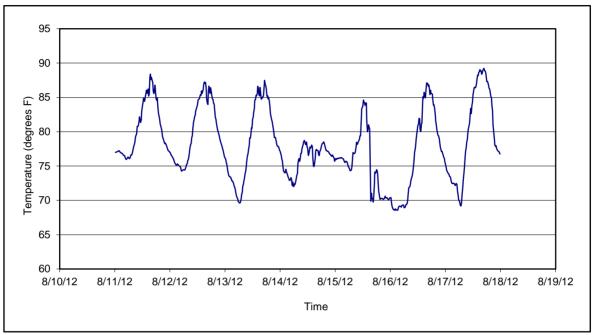


Figure 3. Temperature for the period 08/11/12 through 08/17/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

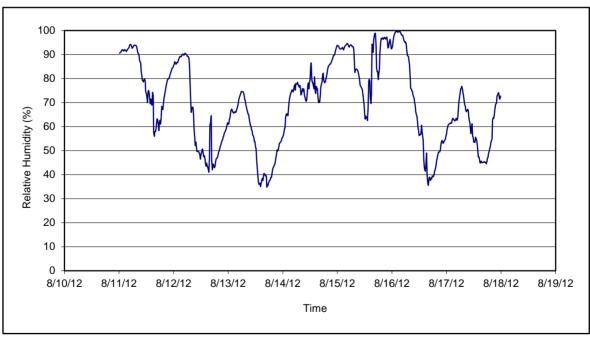


Figure 4. Relative humidity for the period 08/11/12 through 08/17/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

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							site via tarped dur								
							backfill into TFS		Cleaned Wil	low Avenue str	eet using sweeper attach	ment			
					Operated	hoe-ran	n in TFS	1	1		1				
					# of					Minute					
Date	Alert	Station	Start	End	15-min	Wind	Upwind/	Upwind		nd-Upwind	Site Condition	Site Activity During the Period	Actions Taken		
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		l				ļ			Min**	Max**					
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Comments	:														
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	Alert Limit: 100 ug/m ³										- 1	- ` ` `			
			Act	tion Limit:			ug/m³	3.7 ppm 5.0 ppm			25 ppm	3 (n-butanol scale)			
Notes:								•							
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		per cubic met							ND - no data	a available		Field Representative:	R. Marshall		
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Page 1 of _1_

Sampling Date 8 14/2012 General Weather Conditions: System Start Time Continuous Continu		Syster	m Operations	s								General Observations	S			
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	Syste	m Start Time	conti	nuous	Clear- ~	78°F - ~8	35°F								
	Syste	m Stop Time	conti	nuous											
	Total H	rs Monitored	2	24	General De	scription	of Site Activities:								
					Health &	Safety N	/leeting	Deconned dump trucks Leveling gravel roadway near exit at 25 Willow avenue							
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					Load out	soil from	site via tarped du	mptrucks	Tarped dum	p trucks					
					Transpor	ted clear	n backfill into TFS		Cleaned Wi	low Avenue str	eet using sweeper atta	chment			
					Operated	d hoe-rar	n in TFS		Mobilized ar	nd installed sec	ond Tig unit				
					# of				15-	Minute					
Date	Alert	Station	Start	End	# of 15-min	Wind	Upwind/	Upwind	Downwind-Upwind Site Condition		Cita Condition	Site Activity During the Period	Actions Taken		
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ug/m³ - micrograms per cubic meter									ND - no data	a available		Field Representative: R. Marshall			
ppmv - p	arts per mill	ion by volume	9									Date:	8/15/2012		
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	Syster	m Operations	s								General Observations	3				
		ampling Date		/2012	General We	eather C	onditions:									
	Syste	m Start Time	conti	nuous	Clear- ~	78°F - ~8	31°F									
	Syste	m Stop Time	conti	nuous												
		rs Monitored	2	24	General De	scription	of Site Activities:									
					Health &			Deconned dump trucks Installed vents on South side of TFS								
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8/16/2012	No exceed	ances														
Comments	:	•														
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				lert Limit:			ug/m ³	3.7 ppm			-					
			Act	ion Limit:	:	150	ug/m³	5.0 ppm			25 ppm	3 (n-butanol scale)				
** Upwin	d minus dov	e presented by vnwind conce litoring station	ntrations	are a tim						l volatile organi	(i.e. dust) less than 10 ic compounds	microns in diameter				
		per cubic met							ND - no data			Field Representative:	C. John			
		ion by volume							- 110 uate	a available		Field Representative: C. John Date: 8/16/2012				
ppilly - p	ans per mil	ion by volume	7									Date				
													Page 1 of _1_			



	Svste	m Operations	s								General Observations				
		ampling Date		/2012	General We	eather C	onditions:								
	Syste	m Start Time	conti	nuous	Clear- ~	78°F - ~	37°F								
	Syste	m Stop Time	conti	nuous											
		rs Monitored	2	24	General De	scription	of Site Activities:								
					Health &				Deconned of	lump trucks					
	System	Calibrations		Ok	Continuo					elivery of clean	backfill				
		Time/Status)	0647				ut dump trucks	Operated odor and dust suppressant systems							
	,	· ····o/ Otatao)	0011				site via tarped du		Tarped dum		pprocedure oyotomo				
							n backfill into TFS								
					Relocate						abric Structure (TFS)				
						1	1			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		
	riiggoi		Tillio	111110	Periods	D	Downwind	Otation(0)	Min**	Max**		(п аррпоавіс)			
8/17/2012	No exceed	ances			1					1					
J. 11/2012	5 0,,00000	1			†	1									
		İ													
		İ													
		İ													
Comments					•										
						PM-10	(15-min)	TVOC (15-mi	n)	T	VOC (1-min)	Odor Intensity (15-min)			
			А	lert Limit:	:		ug/m ³	3.7 ppm	•		- '	-			
				ion Limit:			ug/m³	5.0 ppm			25 ppm	3 (n-butanol scale)			
** Upwin	d minus dov	e presented by vnwind conce litoring station	y octant (i.e. N, NI are a tim	E, E, SE, S,	SW, W,	NW).			l volatile organi	(i.e. dust) less than 10 m	,			
		per cubic met							ND - no data			Field Representative:	C. John		
		ion by volume							110 uau	a avaliable		Date:	8/17/2012		
ppniv - þ	ans per mili	ion by volume	7									Date: _			
													Page 1 of _ <u>1</u> _		

