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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: September 5, 2012

Regarding: Weekly Community Air Monitoring Report

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

August 25, 2012 through August 31, 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 25, 2012 and August 31, 2012.

There were no fifteen-minute exceedances of the Total Volatile Organic Compounds (TVOC) or odor action levels associated with ground intrusive site activities during this reporting period. There were fifteen-minute exceedances for Particulate Matter (PM-10) [dust]. The elevated levels were caused by the hoe-ram attachment operating on the foundation of the former one-story building. The construction manager was notified, water was sprayed, and the levels dropped below the action and alert levels. 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

Weekly Community Air Monitoring Report Clifton Former MGP Site Operable Unit 2 (OU-2) August 25, 2012 through August 31, 2012 September 5, 2012 Page 2

- Elevated concentrations (if any)
- Meteorological data

Site Construction Activities

Construction activities during this reporting period included:

- Excavated and backfilled in Temporary Fabric Structure (TFS)
- Installed new gravel roadway
- Loaded out contaminated soil off site
- Loaded concrete and rebar into roll off dumpster
- Operated hoe-ram on foundation of one-story building
- Operated odor suppressant systems
- Operated street sweeper along Willow Avenue
- Received deliveries of clean backfill
- Relocated jersey blocks to stabilize TFS
- Relocated TFS
- Stockpiled clean soil
- Stockpiled concrete waste
- Welded rebar from foundation

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 30, 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.

Due to a malfunctioning dust monitor at FAM#2, data were not available from 11:10 pm on Saturday August 25 through 6:47 am on Monday August 27. During this time no site activities were performed as these were non-working hours for the contractor.

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		
8/25/2012	0.2	0.1	0.1	0.1	0.2	0.4	56	ND*	8	23	47	81		
8/26/2012	0.2	0.0	0.0	0.0	0.1	0.1	35	ND*	3	1	3	12		
8/27/2012	0.1	0.1	0.1	0.0	0.3	0.1	33	197*	10	6	23	1		
8/28/2012	0.1	0.1	0.1	0.1	0.1	0.1	37	5	20	8	162**	22		
8/29/2012	0.1	0.2	0.4	0.2	0.4	0.1	33	6	12	12	49	22		
8/30/2012	0.1	0.3	0.3	0.4	0.2	0.2	25	20	7	15	110	17		
8/31/2012	0.2	0.1	0.1	0.1	0.1	0.1	60	56	5	9	44	40		
Average	0.1	0.1	0.2	0.1	0.2	0.2	40	22	9	11	46	28		
Maximum	0.2	0.3	0.4	0.4	0.4	0.4	60	56	20	23	110	81		

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

Due to equipment malfunction there is no recordable data for PM-10 @ FAM#2 from 00:01 on 8/25/12 - 06:47 on 8/27/12.



^{*}These measurements are not reflected for this time period

^{**} This measurement was recorded at an UW/CW station after hours

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

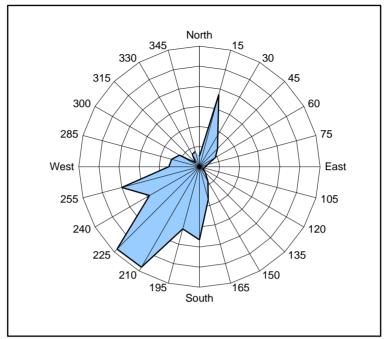


Figure 1. Wind rose for the period 08/25/12 through 08/31/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Wind direction data used to create the wind rose were calculated from 1-minute data.

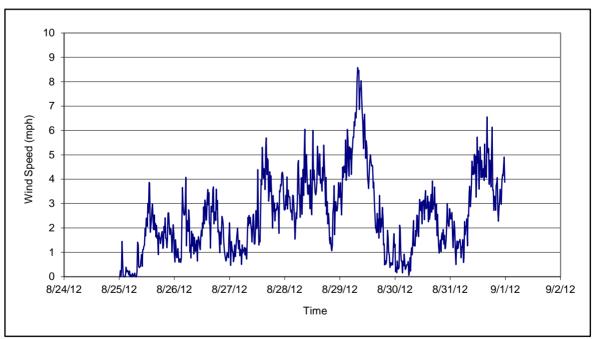


Figure 2. Wind speed for the period 08/25/12 through 08/31/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

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

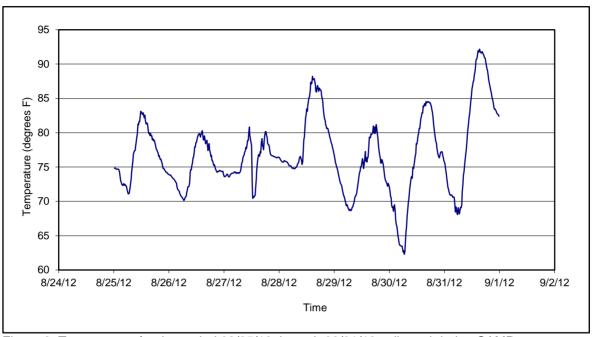


Figure 3. Temperature for the period 08/25/12 through 08/31/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

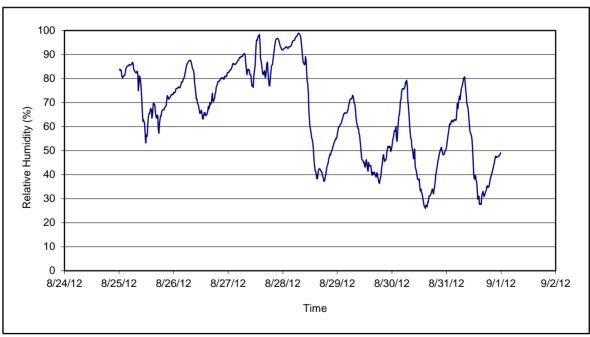


Figure 4. Relative humidity for the period 08/25/12 through 08/31/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

	System O										General Observations					
	S	Sampling Date	8/27	/2012	General We	ather C	onditions:									
	,	em Start Time		nuous	Clear- ~ 7	′2°F - ~7	'8°F									
	,	em Stop Time	conti	nuous												
	Total I	Hrs Monitored	2	24			of Site Activities:		Loading concrete and rebar into roll off dumpster							
					Health &											
		n Calibrations)k	Continuo											
		(Time/Status)	0618	-0859			rary Fabric Structu	re (TFS)								
							es of clean backfill									
						Welding reebar from foundation										
		1			Operated	hoe-ran	on foundation of o	one-story building								
			_		# of					Minute						
Date	Alert	Station	Start	End	15-min	Wind	Upwind/	Upwind		nd-Upwind	Site Condition	Site Activity During the Period	Actions Taken			
	Trigger		Time	Time	Periods	Dir.	Downwind	Station(s)		entration		(if applicable)				
									Min**	Max**		N. eff. I				
8/27/2012	PM-10	FAM#2	7:49	8:04	15	SSE	DW	FAM#3	109	194	3	Hoe-ram operating on foundation	Notified construction manager Water was sprayed			
3/27/2012	PM-10	FAM#2	8:14	8:29	16	SSE	DW	FAM#3	101	150	3	Hoe-ram operating on foundation	Notified construction manager Water was sprayed			
8/27/2012	PM-10	FAM#2	9:47	9:59	16	SSE	DW	FAM#3	99	108	2	Hoe-ram operating on foundation	Notified construction manager Water was sprayed			
8/27/2012	PM-10	FAM#2	10:00	10:00	1	S	DW	FAM#3	108	108	2	Hoe-ram operating on foundation	Notified construction manager Water was sprayed			
omments:									l							
illinents.																
						PM-10	(15-min)	TVOC (15-mi	in)	T	VOC (1-min)	Odor Intensity (15-min)				
	Alert Lin						ug/m ³	3.7 ppm	,		-					
				tion Limit:			ug/m ³	5.0 ppm			25 ppm	3 (n-butanol scale)				
			,101	aon Emille		.50	-9	о.о ррпп			=o bbiii	o (ii batanoi odalo)				
otes:	raatiana ara praaanta	d by catant (i	. NI NIE	E 0E 0	CIAL IAL NIV	Λ.			DM 10 por	ticulate metter	(i.e. dust) loss than 10 mis	arona in diameter				
	rections are presente					·).					(i.e. dust) less than 10 mid	ouis in diaffeter				
	I minus downwind co sed Air Monitoring sta		ie a uine	specific	Joinpanson.				i voc - tota	l volatile organi	ic compounds					
	icrograms per cubic								NA not on	dicable						
-									NA - not app ND - no data			Field Representative:	R. Marshall			
hhiiin - bs	pmv - parts per million by volume									a avallable		rieiu kepiesentative:	r. Iviai Si iali			



8/27/2012

	System O	nerations									General Observations					
		ampling Date	8/28	/2012	General We	eather C	onditions:				Octional Observations					
		em Start Time		nuous	Clear- ~											
		em Stop Time		nuous												
		Irs Monitored		24	General De	scription	of Site Activities:		Loading concrete and rebar into roll off dumpster							
					Health &				Installed new gravel roadway							
	System	n Calibrations		Ok	Continuo			Stockpiled concrete waste								
		(Time/Status)	0622	-0902			blocks to stabilize T	FS								
		,					es of clean backfill									
					Welding i	reebar fr	om foundation									
					Operated	hoe-ran	n on foundation of o	ne-story building								
					# of				15-	Minute						
D-4-	Alert	Station	Start	End	# 01 15-min	Wind	Upwind/	Upwind	Downw	nd-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			
									Min**	Max**						
8/28/2012	PM-10	FAM#5	18:40	19:08	29	WNW	CW/UW	N/A	102	132	1	No activity, After hours	None taken			
8/28/2012	PM-10	FAM#5	19:19	19:20	2	WSW	CW/UW	N/A	101	103	1	No activity, After hours	None taken			
8/28/2012	PM-10	FAM#5	19:23	20:39	67	WSW	CW/UW	N/A	105	162	1	No activity, After hours	None taken			
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Comments:		l i					<u> </u>									
Comments.																
						PM-10	(15-min)	TVOC (15-mir	n)	T\	VOC (1-min)	Odor Intensity (15-min)				
			А	lert Limit:			ug/m ³	3.7 ppm	•		-	-				
			Act	tion Limit:		150	ug/m ³	5.0 ppm			25 ppm	3 (n-butanol scale)				
Notes:																
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	ced Air Monitoring sta									g	4					
	icrograms per cubic								NA - not ap	olicable						
-	arts per million by vol								ND - no dat			Field Representative:	R. Marshall			
												Date:	8/28/2012			



	System Op	erations									General Observations				
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		m Start Time		nuous	Clear- ~ 6	Clear- ~ 69°F - ~81°F									
		m Stop Time		nuous											
	Total H	rs Monitored	2	24			of Site Activities:								
					Health &										
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	(Time/Status)	0618	3-0755			on foundation of c								
						Loaded concrete and rebar into roll off dumpster									
					Stockpile										
	ı	1	1	1	Stockpile	a concre	te waste				1				
	A1		011		# of	100	11. 2. 1/	11. 2.1		Minute		On Asia in Burnella Burnella			
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	Trigger		Time	Time	Periods	DII.	Downwind	Station(s)	Min**	Max**		(ii applicable)			
8/29/2012	No Exceedances					1			IVIIII	IVIAA					
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						<u> </u>									
comments:															
						DM-10	15-min)	TVOC (15-mi	in\	T	VOC (1-min)	Odor Intensity (15-min)			
			Δ	lert Limit:		100		3.7 ppm	,		-	odor interisity (13-11111)			
				tion Limit:		150		5.0 ppm			25 ppm	3 (n-butanol scale)			
leten			7101	aon Emille		.50	- J	о.о ррпп			-0 PPIII	o (ii balanoi soale)			
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	irections are presented d minus downwind con									liculate matter i I volatile organi	(i.e. dust) less than 10 mic	rons in diameter			
	a minus downwind con xed Air Monitoring stat		ue a urne	specific	companson.				1 VOC - 101a	voiaule organi	c compounds				
	xed Air Monitoring Stat nicrograms per cubic n								NA - not app	dicable					
	arts per million by volu								ND - no data			Field Representative:	C. John		
ppinv - p	and per million by void								TID - IIU date	a a valiable		Date:	8/29/2012		



	System Op	erations									General Observations					
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	Syster	m Start Time	conti	nuous	Clear- ~ 6	63°F - ~8	34°F									
	System	m Stop Time	conti	nuous												
	Total H	rs Monitored	2	24	General De	scription	of Site Activities:									
					Health &			Stockpiled Concrete waste								
	System	Calibrations		Ok	Continuo			Loaded out of contaminated soil								
		Time/Status)	0648	-0827			n on foundation of o	ne-story building								
	•	-			Loaded c	oncrete	and rebar into roll of	ff dumpster								
					Stockpile	d Clean	Soil									
					Operated	odor su	ppressant systems									
									15-	-Minute						
D. (_ Alert _		Start	End	# of 15-min	Wind	Upwind/	Upwind	Downw	ind-Upwind	0.4 0 0 150	Site Activity During the Period	A.C Til			
Date	Trigger	Station	Time	Time	Periods	Dir.	Downwind	Station(s)	Cond	entration	Site Condition	(if applicable)	Actions Taken			
					renous				Min**	Max**						
8/30/2012	PM-10	FAM#5	12:11	12:17	7	WNW	CW/UW	N/A	101	110	1	Offsite activities	None taken			
										-						
Comments:				I	<u>I</u>	ı				ļ						
							(15-min)	TVOC (15-mir	n)	T	VOC (1-min)	Odor Intensity (15-min)				
			Α	lert Limit:			ug/m³	3.7 ppm			-	- 1				
			Act	tion Limit:		150	ug/m³	5.0 ppm			25 ppm	3 (n-butanol scale)				
** Upwind	rections are presented I minus downwind con ked Air Monitoring stat	centrations a								rticulate matter al volatile organ	(i.e. dust) less than 10 mid ic compounds	crons in diameter				
ug/m³ - m	ted Air Monitoring stat hicrograms per cubic n arts per million by volu	neter							NA - not ap			Field Representative: Date:	C. John 8/30/2012			



	System Op	erations			General Observations											
		ampling Date	8/31/	/2012	General We	eather Co	onditions:									
		m Start Time		nuous	Clear- ~ 6	69°F - ~8	8°F									
		m Stop Time		nuous												
		rs Monitored		24	General De	scription	of Site Activities:									
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	System	Calibrations	C	Ok	Continuo				Load out contaminated soil off site							
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	Alert		Start	End	# of	Wind	Upwind/	Upwind		nd-Upwind		Site Activity During the Period				
Date	Trigger	Station	Time	Time	15-min	Dir.	Downwind	Station(s)		ncentration Site Condition		(if applicable)	Actions Taken			
	33				Periods			(-,	Min**	Max**		(11				
8/31/2012	No exceedances												None taken			
Comments:																
							(15-min)	TVOC (15-mi	n)	Т	VOC (1-min)	Odor Intensity (15-min)				
				lert Limit:		100		3.7 ppm			-	-				
			Act	tion Limit:		150 ו	ug/m³	5.0 ppm			25 ppm	3 (n-butanol scale)				
Notes:																
	rections are presented					V).					(i.e. dust) less than 10 mi	crons in diameter				
** Upwind	d minus downwind con	centrations a	re a time	specific (comparison.				TVOC - tota	l volatile organ	ic compounds					
	xed Air Monitoring stat															
ug/m³ - n	nicrograms per cubic n	neter							NA - not app	olicable						
ppmv - p	arts per million by volu	ime							ND - no data	a available		Field Representative:	C. John			
											Date:	8/31/2012				

