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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: November 27, 2012

Regarding: Weekly Community Air Monitoring Report

Clifton Former MGP Site - Operable Unit 2 (OU-2) November 17, 2012 through November 23, 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 November 17, 2012 and November 23, 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 we exceedances for PM-10 above the alert level at an upwind station during working hours and during non-working hours attributed to offsite activities. 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)
- Deconned dump trucks
- Loaded out soil from TFS
- Tarped dump trucks
- Relocated bin-blocks

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 November 21, 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

			I		
	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	
11/17/2012	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
11/18/2012	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	
11/19/2012	1.6	0.5	0.1	2.6	0.1	0.4	32	11	5	11	28	73	
11/20/2012	0.2	0.1	0.1	0.1	0.1	0.7	51	90	10	15	31	120	
11/21/2012	0.2	0.3	0.4	0.2	0.2	0.7	59	26	10	22	66	85	
11/22/2012	0.1	0.2	0.1	0.1	0.1	0.6	71	22	8	12	26	121	
11/23/2012	0.1	0.2	0.1	0.1	0.1		58	22	9	15	37	121	
Average	0.4	0.3	0.2	0.6	0.1	0.6	54	34	8	15	38	104	
Maximum	1.6	0.5	0.4	2.6	0.2	0.7	71	90	10	22	66	121	

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



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

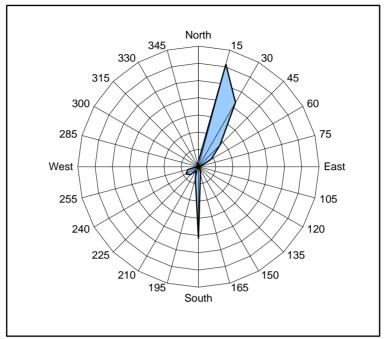


Figure 1. Wind rose for the period 11/17/12 through 11/23/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Wind direction data used to create the wind rose were calculated from 1-minute data.

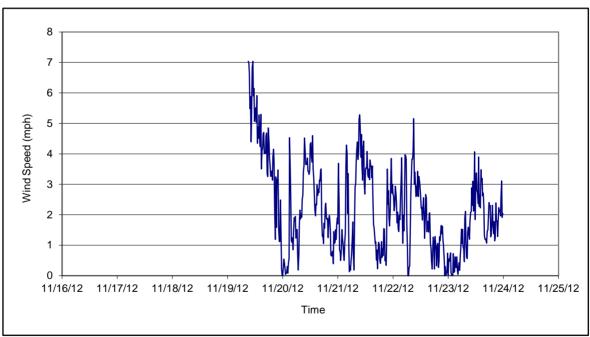


Figure 2. Wind speed for the period 11/17/12 through 11/23/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

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

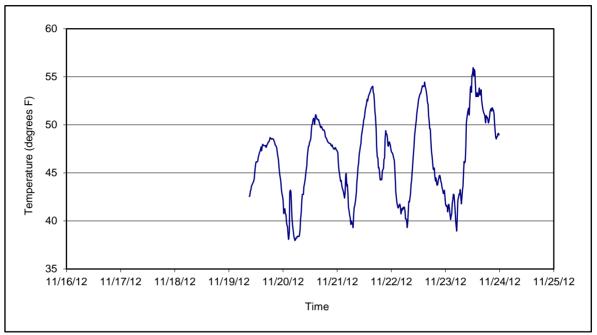


Figure 3. Temperature for the period 11/17/12 through 11/23/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.



Figure 4. Relative humidity for the period 11/17/12 through 11/23/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

Daily Field Report Community Air Monitoring Program Clifton Former MGP Site Operable Unit 2 Borough of Staten Island, New York

	n Oneretien			General Observations											
	System Operations Sampling Date 11/19/2012					General Weather Conditions:									
				nuous		General weatine Continuous. Clear - 41°F52°F									
		Start Time			Clear - ~	- 41°F	~52°F								
		n Stop Time		nuous											
	I otal Hr	s Monitored	2	24			of Site Activities:								
					Health &										
		Calibrations	C)k	Continuo										
	(T	ime/Status)	0734	-0922			nporary Fabric Stru	cture (TFS)							
					Deconne	d dump	trucks								
					Loaded of	out soil fr	om TFS								
					Tarped d	lump truc	cks								
									15-N	linute					
	Alert		Start	End	# of	Wind	Upwind/	Upwind		d-Upwind	Site	Site Activity During the Period			
Date	Trigger	Station	Time	Time	15-min	Dir.	Downwind	Station(s)		ntration	Condition	(if applicable)	Actions Taken		
	55				Periods			(-)	Min**	Max**		(ii apprisable)			
11/19//2012	No exceed	dances		l					1		 		None taken		
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Comments:															
						DM 40	(4F!)	TV00 (45 ·)		T)/00	\ (4!\	Odes between 145 mile)			
							(15-min)	TVOC (15-min)		1 000	(1-min)	Odor Intensity (15-min)			
				ert Limit:			ug/m³	3.7 ppm			-				
ļ			Act	ion Limit:		150	ug/m ³	5.0 ppm		25	ppm	3 (n-butanol scale)			
Notes:															
		e presented b										less than 10 microns in diameter			
** Upwind	** Upwind minus downwind concentrations are a time specific comparison.								TVOC - to	al volatile o	organic compou	unds			
FAM - Fix	ed Air Mor	nitoring statio	n location	n											
	ug/m³ - micrograms per cubic meter								NA - not a	oplicable					
ppmv - pa	arts per mil	lion by volum	ne						ND - no da	ita available	Э	Field Representative:	R. Marshall		
1	•											Date:	11/19//2012		
												-	Page 1 of _1_		



Daily Field Report Community Air Monitoring Program Clifton Former MGP Site Operable Unit 2 Borough of Staten Island, New York

	m Operation	s							Gener	al Observation	ons		
	mpling Date	11/20		General We	eather Co	onditions:							
		n Start Time	contir	nuous	Clear - ~	- 41°F	~50°F						
		n Stop Time	contir	nuous									
	Total Hr	s Monitored	2	4			of Site Activities:						
					Health &								
		Calibrations		k	Continuo								
	(T	ime/Status)	0657	-0905			nporary Fabric Stru	cture (TFS)					
					Deconne								
					Loaded o								
					Tarped d	lump truc	cks				1		
					# of					linute			
Date	Alert	Station	Start	End	15-min	Wind	Upwind/	Upwind		d-Upwind	Site	Site Activity During the Period	Actions Taken
	Trigger		Time	Time	Periods	Dir.	Downwind	Station(s)		ntration	Condition	(if applicable)	
									Min**	Max**			
11/20//2012	PM-10	FAM#6	12:12	12:21	10	N	UW	N/A	101	120	1	Off site activity	Construction manager was notified No action taken
Comments:						•							
								TVOC (15-min) 3.7 ppm		TVOC	C (1-min)	Odor Intensity (15-min)	
				on Limit:			ug/m³	5.0 ppm		25	- 5 ppm	3 (n-butanol scale)	
** Upwind	d minus do	e presented to wnwind concurrence to the presented to the	entrations	s are a ti							atter (i.e. dus	t) less than 10 microns in diameter bunds	
									NA - not a	oplicable			
ug/m³ - micrograms per cubic meter ppmv - parts per million by volume										ita available	е	Field Representative: Date:	R. Marshall 11/20//2012
												Date.	Page 1 of _1



Daily Field Report Community Air Monitoring Program Clifton Former MGP Site Operable Unit 2 Borough of Staten Island, New York

	Syster	n Operation	s		General Observations								
		mpling Date	11/21	/2012	General We	eather Co	onditions:						
	System	Start Time	contin	nuous	Clear - ~	40°F -	-52°F						
	Systen	n Stop Time	contir	nuous									
		s Monitored	2		General De	scription	of Site Activities:						
Health & Safety Meeting Relocated bin-blocks													
	System	Calibrations	0	lk	Continuous Air Monitoring					DIII DIOONO			
		ime/Status)	0649-				nporary Fabric Stru	cture (TES)					
	(1	ine/Status)	0043	-0022	Deconne			cture (11 5)					
					Loaded o								
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					raipeu u	ump truc	, Ko		45.14	inute			
	Alert		Start	End	# of	Wind	Upwind/	Upwind	Downwin		Site	Site Activity During the Period	
Date	Trigger	Station	Time	Time	15-min	Dir.	Downwind	Station(s)	Conce		Condition	(if applicable)	Actions Taken
	riiggei		Tille	Tille	Periods	Dii.	Downwind	Station(s)	Min**	Max**	Condition	(п аррпсаые)	
11/21//2012	No exceed	dances							IVIIII	IVIAA			None taken
													tanon
Comments:													
	PM-10 (15-min) TVOC (15-min)									TVOC	(1-min)	Odor Intensity (15-min)	
			Ale	ert Limit:			ug/m³	3.7 ppm			-		
			Acti	on Limit:		150	ug/m ³	5.0 ppm		25	ppm	3 (n-butanol scale)	
Notes:								·					
* Wind di	* Wind directions are presented by octant (i.e. N, NE, E, SE, S, SW, W, NW). ** Upwind minus downwind concentrations are a time specific comparison. FAM - Fixed Air Monitoring station location ug/m³ - micrograms per cubic meter								PM-10 - particulate matter (i.e. dust) less than 10 microns in diameter TVOC - total volatile organic compounds				
									NA - not ap	onlicable			
		lion by volum							ND - no da)	Field Representative:	R. Marshall
PP PS			-									Date:	11/21//2012
1													Page 1 of _1_

