

455 Winding Brook Drive Suite 201 Glastonbury, CT 06033 Ph: (860) 368-5300 Fax: (860) 368-5307

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: December 21, 2012

Regarding: Weekly Community Air Monitoring Report

Clifton Former MGP Site - Operable Unit 2 (OU-2) December 8, 2012 through December 14, 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 December 8, 2012 and December 14, 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 was an exceedance above the alert level for Particulate Matter (PM-10) [dust] at a crosswind station. This was caused by sawing through the concrete sidewalk during site restoration at close proximity to the station. The construction manager was notified, water was applied and the levels dropped below the alert level. 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

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- Elevated concentrations (if any)
- Meteorological data

Site Construction Activities

Construction activities during this reporting period included:

- Excavated in Temporary Fabric Structure (TFS)
- Deconned dump trucks
- Received deliveries of clean backfill
- Installed erosion control along Bay Street
- Installed lining in the bottom of the trench north of the TFS
- Leveled terrain in the TFS
- Loaded out soil from the TFS
- Performed Shallow excavation northeast of the TFS
- Received deliveries of clean backfill
- Restored side walk along Willow Avenue
- Tarped dump trucks
- Transported soil into the TFS
- Loaded out soil from shallow excavation

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 December 12, 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		
12/8/2012	0.0	0.1	0.4	0.1	0.1	0.0	79	5	34	45	65	79		
12/9/2012	0.0	0.1	0.2	0.1	0.1	0.0	68	6	21	34	53	57		
12/10/2012	0.0	0.5	0.4	0.5	0.3	0.0	96	97	3	84	107	112		
12/11/2012	0.0	0.1	0.6	0.6	0.5	0.0	44	29	9	28	40	45		
12/12/2012	0.0	0.2	0.5	0.4	0.1	0.0	27	28	148	41	55	39		
12/13/2012	0.0	0.2	0.1	0.0	0.1	0.0	60	27	12	43	64	32		
12/14/2012	0.1	0.1	0.2	0.5	0.1	0.0	64	65	14	42	63	39		
Average	0.0	0.2	0.4	0.3	0.2	0.0	63	37	34	45	64	58		
Maximum	0.1	0.5	0.6	0.6	0.5	0.0	96	97	148	84	107	112		

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

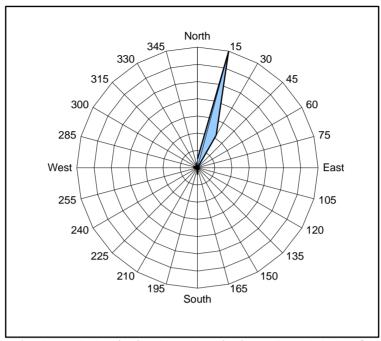


Figure 1. Wind rose for the period 12/08/12 through 12/14/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Wind direction data used to create the wind rose were calculated from 1-minute data.

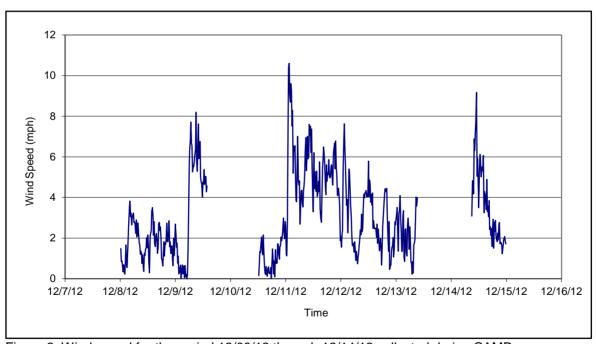


Figure 2. Wind speed for the period 12/08/12 through 12/14/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

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

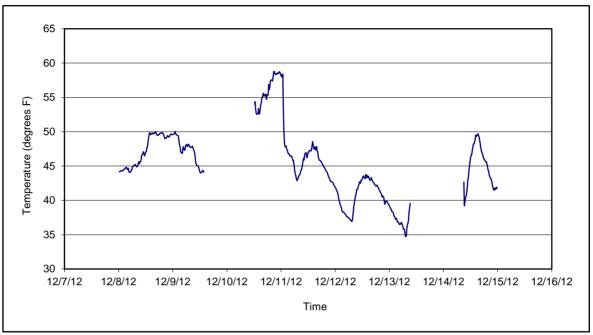


Figure 3. Temperature for the period 12/08/12 through 12/14/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

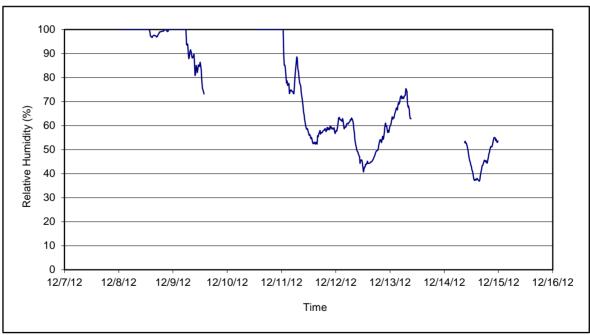


Figure 4. Relative humidity for the period 12/08/12 through 12/14/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

	System Op	erations								Genera	I Observation	18				
		ampling Date	12/10	/2012	General Weat	her Cond	ditions:									
	System	m Start Time	contin	nuous	Overcast	- ~ 44°	F - ~54°F									
	Syste	m Stop Time	contin	nuous	1											
	Total H	rs Monitored	2	4	General Desci	ription of	Site Activities:									
					Health &	Safety N	1eeting		Transported soil into TFS							
	System	Calibrations	C	k	Continuous Air Monitoring					Restored side walk west of 85 Willow Ave						
	(Time/Status)	0645	-1027	Excavated in Temporary Fabric Structure (TFS)					f clean bacl	cfill					
					Deconne											
					Loaded of											
					Tarped d	lump truc	cks		1							
			_		# of					linute						
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)	Min**	ntration Max**	Condition	(if applicable)				
12/10//2012	PM-10	FAM#5	12:54	13:26	33	NNE	CW/DW	FAM#6	0	iviax 3	1	Dump trucks moviing along the terrain	CM notified			
12/10/2012	PM-10	FAM#6	12:47	13:24	37	NNW	UW	N/A	100	112	1	Dump trucks moving along the terrain	CM notified			
12/10/2012	1 101 10	17441770	12.77	10.24	0.	14.400	OW	N/A	100	112	·	Dump trucks moving along the terrain	Civi flotified			
					1				1							
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Comments:																
						PM-10	(15-min)	TVOC (15-min)		TVO	C (1-min)	Odor Intensity (15-min)				
			Al	ert Limit:			ug/m ³	3.7 ppm			-	-				
				on Limit:			ug/m³	5.0 ppm		25	ppm	3 (n-butanol scale)				
Notes:							-					,				
	tions are presente	d by octant (i	e. N. NF	E.SE	s. sw. w. nw)				PM-10 - na	articulate m	atter (i.e. dust	t) less than 10 microns in diameter				
	ninus downwind co										organic compo					
	Air Monitoring sta										5 · · · · · · · · · · · · · · · · · · ·					
	rograms per cubic								NA - not a	pplicable						
ppmv - parts	s per million by vol						ND - no da	ata availabl	е	Field Representative:	R. Marshall					
	•											Date:	12/10//2012			
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	System Op	erations				General Observations											
		mpling Date	12/11	/2012	General Weat	ner Cond	ditions:			2011010							
		Start Time		nuous			42°F - ~47°F										
		n Stop Time		nuous	,	.,											
		s Monitored		4	General Descr	iption of	Site Activities:										
					Health &	Safetv N	/leeting		Transported soil into TFS								
	System	Calibrations	C)k	Continuous Air Monitoring					Restored side walk along Willow Ave							
		ime/Status)	0729	-0834						clean back							
	•	,			Deconne			, ,	Shallow ex	cavation p	erformed Nort	h East of TFS					
					Loaded o	ut soil fr	om TFS		Bull Dozer	spreading	material into	TFS					
					Tarped d	ump truc	cks										
					11 -4				15-N	linute							
Date	Alert C		Start	End	# of 15-min	Wind	Upwind/	Upwind	Downwir	d-Upwind	Site	Site Activity During the Period	Actions Taken				
Date	Trigger	Station	Time	Time	Periods	Dir.	Downwind	Station(s)	Conce	ntration	Condition	(if applicable)	Actions Taken				
					1 011000				Min**	Max**							
12/11//2012	No Exceedances												No Action Taken				
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Comments:					1				1								
							(15-min)	TVOC (15-min)		TVO	C (1-min)	Odor Intensity (15-min)					
				ert Limit:			ug/m³	3.7 ppm			-	-					
			Acti	ion Limit:		150	ug/m³	5.0 ppm		25	ppm .	3 (n-butanol scale)					
Notes:																	
	ctions are presented											t) less than 10 microns in diameter					
	minus downwind cor		are a time	e specific	comparison.				TVOC - to	tal volatile o	organic compo	ounds					
	d Air Monitoring stat																
	rograms per cubic r								NA - not applicable								
ppmv - part	ts per million by volu	me							ND - no da	ata available	е	Field Representative:	C. John				
												Date:	12/11/2012				
													Page 1 of _1_				



	System Op	erations				General Observations										
		mpling Date	12/12	/2012	General Weath	ner Cond	ditions:									
	Systen	n Start Time	contir	nuous	Clear - ~	37°F - ~	-43°F									
		n Stop Time	contir	nuous	1											
	Total Hr	s Monitored	2	4	General Descr											
					Health &				Transported soil into TFS							
		Calibrations		k	Continuo				Restored side walk along Willow Ave							
	(T	ime/Status)	0641-	-0758			nporary Fabric Stru	cture (TFS)			f clean backfill					
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	rrigger		Time	Time	Periods	DII.	Downwind	Station(s)	Min**	Max**	Condition	(ii applicable)				
					 							Sawing through concrete sidewalk	Notified construction manager			
12/12//2012	PM-10	FAM#3	10:05	10:19	15	NNE	CW	FAM#2	92	141	2	along Willow Avenue	Water was applied			
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* Wind direct ** Upwind m	ctions are presented	ncentrations a									atter (i.e. dust organic compo) less than 10 microns in diameter aunds				
	Air Monitoring stat rograms per cubic r								NIA net -	nnliaahle						
	rograms per cubic r s per million by volu								NA - not applicable ND - no data available Field Rep				C. John 12/12/2012			
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	System Op									Gene	eral Observations				
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1		m Start Time		nuous	Clear	37°F -	~43°F								
1		m Stop Time		nuous											
	Total H	rs Monitored	2	24			Site Activities:								
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	System	Calibrations	()k	Continuo	us Air M	lonitoring		Installed e	rrosion con	trol along Bay St.				
	(Time/Status)	0742	-0944			nporary Fabric Stru	cture (TFS)	Delivery of						
					Deconned dump trucks					shallow ex	cavation North Ea	st of TFS			
					Loaded of					rrain in TFS					
					Tarped d	ump tru	cks		Restored :	siidewalk al	ong Willow Avenue				
					# of					linute					
Date	Alert	Station	Start	End	15-min	Wind	Upwind/	Upwind		d-Upwind	Site Condition	Site Activity During the Period	Actions Taken		
Date	Trigger	Station	Time	Time	Periods	Dir.	Downwind	Station(s)		ntration	One condition	(if applicable)	Actions ration		
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	d Air Monitoring sta crograms per cubic								NIA not o	onlianhla					
	• .								NA - not a			Field Denge 1-4	Claha		
ppmv - par	ts per million by vol	ume							ND - no da	ita available	е	Field Representative:	C. John		
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	System Ope	erations									General Observations						
		mpling Date	12/14	/2012	General Weat	ner Cond	ditions:				Constant Castal Validity						
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1		Stop Time		nuous													
		s Monitored			General Descr	iption of	Site Activities:										
					Health &	Safety N	/leeting		Transported soil into TFS								
	System	Calibrations	C)k	Continuo				Restored :	side walk ald	ong Willow Ave	Hoe Ram operated inside Trench north of TF	rs				
	, (T	ime/Status)	0742	-0944	Excavate	d in Ten	nporary Fabric Stru	icture (TFS)		clean back		Stockpiled Cement w/ rebar and load out into	tarped dump trucks				
					Deconne	d dump	trucks		Shallow ex	cavation pe	erformed North East of TFS	Tarped Clean backfill Stockpile in preparation	n for Weekend incliment weather				
					Loaded of	ut soil fr	om TFS		Bull Dozer	spread ma	terial into TFS						
					Tarped d	ump truc	cks		Sidewalk I	Restorated a	along Willow Ave.						
									15-N	linute							
Date	Alert	Station	Start	End	# of 15-min	Wind	Upwind/	Upwind	Downwir	d-Upwind	Site Condition	Site Activity During the Period	Actions Taken				
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12/14//2012	No Exceedances												No Action Taken				
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						PM-10	(15-min)	TVOC (15-min)			TVOC (1-min)	Odor Intensity (15-min)					
			Al	ert Limit:			ug/m ³	3.7 ppm			-	-					
1				ion Limit:			ug/m ³	5.0 ppm			25 ppm	3 (n-butanol scale)					
Notes:																	
	ctions are presented	l by octant (i	e N NF	F SF S	S SW W NW)				PM-10 - n:	articulate ma	atter (i.e. dust) less than 10 n	nicrons in diameter					
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	d Air Monitoring stat				22						gp - 3/100						
	rograms per cubic n								NA - not a	pplicable							
	s per million by volu									ata available	9	Field Representative:	C. John				
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