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Memorandum

To: Andrew Prophete (National Grid NY)

From: Brian Skelly

Copy to: Richard Dana, 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 (GEI Consultants, Inc.)

Date: June 5, 2012

Regarding: Weekly Community Air Monitoring Report Clifton Former MGP Site - Operable Unit 2 (OU-2) May 26, 2012 throughJune 1, 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 May 26 and June 1, 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 onsite truck traffic onsite. 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:

- Backfilling excavated area along Bay Street with slurry
- Backfilling Willow Ave trench with kiln-dust
- Decontaminating dump trucks on decontamination pad
- Receiving deliveries of kiln-dust in OU-2
- Excavating along Bay Street for slurry wall installation
- Excavating along Willow Avenue for buttress wall installation
- Operating hoe-ram at Willow Avenue excavation
- Loading soil offsite via dump trucks
- Mixing slurry at batch plant in OU-2
- Mixing soil inside the temporary fabric structure (TFS)w/ kiln-dust
- Removing containment boxes from site via flatbed truck
- Removing generator from site via flatbed truck
- Site surveying on Bay Street
- Stockpiling concrete blocks in OU-2
- Covering dump trucks with tarps using scaffolding
- Transporting equipment around OU-2 using construction vehicle
- Transporting soil from excavation along Willow Avenue to the TFS via pave loader
- Transporting soil from excavation operations along Bay Street and Willow Avenue into the TFS via dump trucks

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). FAM#3 was located in the northeast corner of the 40 Willow Avenue Property during the week. 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. Diesel generators were used to power the four AirLogics Classic stations and will continue 24 hours a day, 7 days per week until 120 volt electrical connections are established onsite.

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 May 31, 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. Weekly Community Air Monitoring Report Clifton Former MGP Site Operable Unit 2 (OU-2) May 26, 2012 through June 1, 2012 June 5, 2012 Page 3

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.

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/m ³ , < 150 ug/m ³	≥ 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/m ³ , < 440 ug/m ³	≥ 440 ug/m ³

Notes:

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)

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



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

			ΤV	OC			PM-10							
Date			(pp	om)			(ug/m ³)							
	FAM#1	FAM#2	FAM#3	FAM#4	FAM#5	FAM#6	FAM#1	FAM#2	FAM#3	FAM#4	FAM#5	FAM#6		
5/26/2012	ND ^(a)	0.2	0.2	0.3	0.1	0.1	57	24	3	15	4	62		
5/27/2012	ND ^(a)	0.1	0.1	0.2	0.1	0.1	76	27	3	21	8	78		
5/28/2012	ND ^(a)	0.1	0.1	0.2	0.1	0.1	87	22 ^(b)	2	9	0	54		
5/29/2012	1.2 ^(a)	0.1	0.1	0.7	0.1	0.1	142	27 ^(b)	68	1 ^(c)	0	65		
5/30/2012	0.1	0.1	0.1	0.4	0.1	0.1	157	22	44	17 ^(c)	0	68		
5/31/2012	0.1	0.1	0.1	0.3	0.1	0.1	60	31	8	18 ^(d)	4	66		
6/1/2012	0.1	0.2	0.1	0.2	0.1	0.1	32	3	4	14 ^(d)	5	44		
Average	0.1	0.1	0.1	0.3	0.1	0.1	87	21	19	15	3	62		
Maximum	0.1	0.2	0.2	0.7	0.1	0.1	157	31	68	21	8	78		

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

^(a) Due to an equipment malfunction, no TVOC data are available for FAM#1 from 02:15 on 5/26/12 - 06:41 on 5/29/12.

^(b) Due to an equipment malfunction, no TVOC data are available for FAM#2 from 12:17 on 5/28/12 - 06:39 on 5/29/12.

^(c) Due to a power loss, no TVOC and PM-10 data are available for FAM#4 from 20:48 on 5/29/12 - 06:18 on 5/30/12.

^(d) Due to an equipment malfunction, no TVOC and PM-10 data are available for FAM#4 from 22:03 on 5/31/12 - 08:13 on 6/1/12.



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

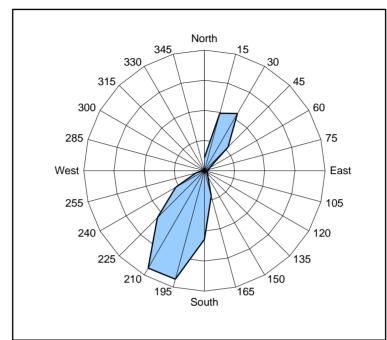


Figure 1. Wind rose for the period 05/26/12 through 06/01/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Wind direction data used to create the wind rose were calculated from 1-minute data.

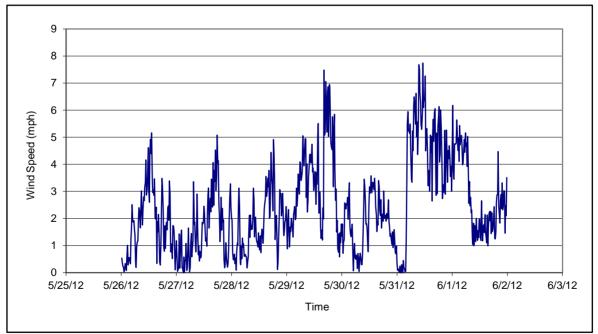


Figure 2. Wind speed for the period 05/26/12 through 06/01/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

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

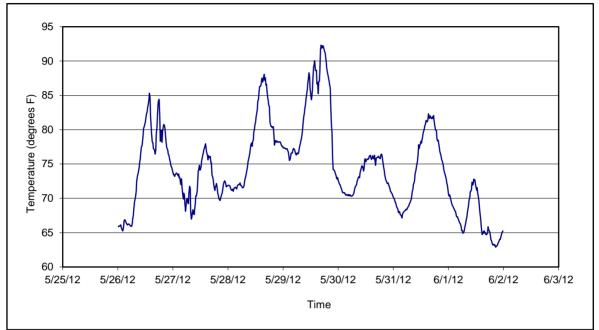


Figure 3. Temperature for the period 05/26/12 through 06/01/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

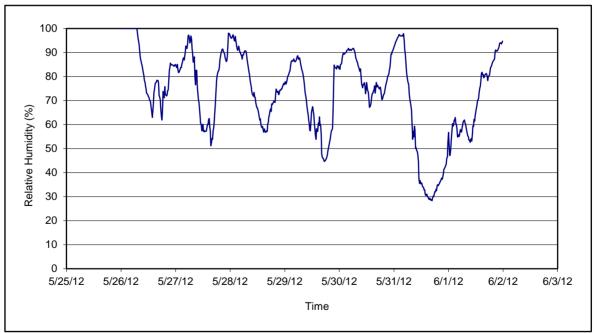


Figure 4. Relative humidity for the period 05/26/12 through 06/01/12 collected during CAMP implementation at the Clifton Former MGP Site - Operable Unit 2. Data are 15-minute averages.

	-	m Operatior								Genera	I Observatior	IS			
l		ampling Date		/2012	General We	eather Co	onditions:								
		m Start Time		nuous	Clear - ~8	88°F- ~9	0°F		Deconned dump trucks on decon pad						
	•	m Stop Time		nuous						nptrucks using					
	Total H	rs Monitored	2	24			of Site Activities:					ations along Bay St. into the TFS via dump tru	cks		
					Health &		-			y at batch pla					
		Calibrations)k	Continuo							treet with slurry			
	(Time/Status)	0636	-0916	Site surve					offsite via du					
							st in OU-2					ations along Willow Ave into the TFS via dump	o trucks		
							he TFS w/ Kil-dust				n site via flatbe				
		1			Excavatio	on along	Willow ave for butt	ress wall installation	1		. for slurry wall	installation			
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)			
5/29/2012	PM-10	FAM#1	14:52	15:05	14	ESE	UW	N/A	119	124	1	Dump trucks moving along the site	Notified W		
5/29/2012	PM-10	FAM#1	16:39	16:53	15	SSW	CW	N/A	107	142	1	Dump trucks moving along the site	Notified W		
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Comments:				1		1									
Somments.	•														
			A	lert Limit	:		(15-min) ug/m ³	TVOC (15-min) 3.7 ppm		TVOC	(1-min) -	Odor Intensity (15-min)			

5.0 ppm

Notes:

* Wind directions are presented by octant (i.e. N, NE, E, SE, S, SW, W, NW).

Action Limit:

** Upwind minus downwind concentrations are a time specific comparison.

FAM - Fixed Air Monitoring station location

ug/m³ - micrograms per cubic meter

ppmv - parts per million by volume

Due to equipment malfunction no recordable data is available for FAM#1 from 00:01 - 6:41 (non working hours).

 150 ug/m^3

Due to power loss no recordable data is available for FAM#4 from 00:01 - 06:38 (non working hours).

PM-10 - particulate matter (i.e. dust) less than 10 microns in diameter TVOC - total volatile organic compounds NA - not applicable ND - no data available Field Re

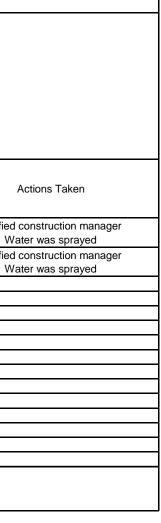
25 ppm

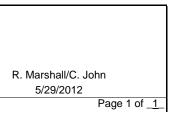
Field Representative:

3 (n-butanol scale)



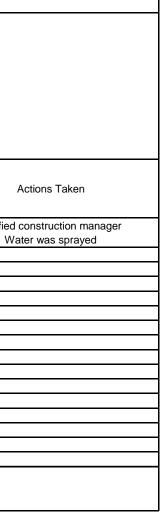


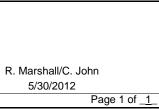




	Syste	m Operation				General Observations										
	Sa	ampling Date	5/30	/2012	General We	eather C	onditions:									
	Syster	m Start Time	conti	nuous	Clear - ~	70°F- ~7	6°F									
	System Stop Time continuous								Deconned dump trucks on decon pad							
	Total H	rs Monitored	2	24	General De	scriptior	of Site Activities:		Tarped dum	ptrucks using	scaffolding					
					Health &	Safety N	leeting		Mixed slurry	/ at batch plar	nt in OU-2					
	System	Calibrations	C)k	Continuo	us Air M	onitoring		Backfilled e	xcavated area	a along Bay S	treet with slurry				
		Time/Status)	0650	-0907	Site surve					offsite via du						
		,					st in OU-2					ations along Willow Ave into the TFS via dump	trucks			
							the TFS w/ Kil-dust					via flatbed truck				
								ress wall installation			for slurry wall					
	[I	1					Vinute						
_	Alert		Start	End	# of	Wind	Upwind/	Upwind		nd-Upwind	Site	Site Activity During the Period				
Date	Trigger	Station	Time	Time	15-min	Dir.	Downwind	Station(s)	Concentration		Condition	(if applicable)				
	55-		-		Periods				Min**	Max**		(
5/29/2012	PM-10	FAM#1	14:22	14:29	8	S	DW	N/A	133	138	2	Dump trucks moving along the site	Notified W			
										1						
										1						
					1											
					1											
Comments	-															
Comments	•															
						PM-10	(15-min)	TVOC (15-min)		тиос	(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:																
* Wind di	rections are	e presented b	by octant	(i.e. N, N	E, E, SE, S,	SW, W,	NW).		PM-10 - pai	ticulate matte	r (i.e. dust) le	ss than 10 microns in diameter				
		wnwind conce							TVOC - tota	al volatile orga	inic compound	ds				
		nitoring statio							NA - not ap							
		per cubic me							ND - no dat			Field Representative:	R			
ppmv - pa	arts per mil	lion by volum	e									Date:				
	•	•										=				
L																







	System	npling Date	5/31/2	2012	General We	othor Co	and Change and												
		Stort Time			General Weather Conditions: Clear - ~68°F- ~81°F														
	Svstem	System Start Time continuous					°F												
		n Stop Time	contin	uous															
	Total Hrs	s Monitored	24	4	General De	scription	of Site Activities:												
					Health &	Safety M	eeting		Deconned o	lump trucks o	n decon pad								
	System (Calibrations	0	k	Continuo					ptrucks using									
		ime/Status)	0611-	0859	Site surve					at batch plan									
		,					ne TFS w/ Kil-dust			offsite via dur									
					Excavatio	on along	Nillow ave for butt	ess wall installation			nch with kil-dust								
								ng Willow Ave to the TFS via pave loader			round OU-2 using constru	ction vehicle							
								.		/linute	<u> </u>								
	Alert Frigger	Station	Start Time	End Time	# of 15-min	Wind Dir.	Upwind/ Downwind	Upwind Station(s)	Downwind-Upwind Concentration		Downwind-Upwind		Downwind-Upwind		Downwind-Upwind		Site Condition	Site Activity During the Period (if applicable)	Actions Taken
					Periods				Min** Max**										
31/2012	None												No exceedances						
mments:																			
						PM-10 (TVOC (15-min)		т	VOC (1-min)	Odor Intensity (15-min)							
	Alert Limit:					• II					-	-							
			Acti	on Limit:		150 ເ	ig/m°	5.0 ppm			25 ppm	3 (n-butanol scale)							

FAM - Fixed Air Monitoring station location

ug/m³ - micrograms per cubic meter

ppmv - parts per million by volume

Due to equipment malfunction no recordable data is available for FAM#2 from 22:03 - 23:59 (After hours)

PM-10 - particulate matter (i.e. dust) less than 10 microns in diameter TVOC - total volatile organic compounds NA - not applicable ND - no data available



Field Representative: R. Marshall Date: ______5/31/2012 Page 1 of _1___

		m Operation								General C	bservations		
		mpling Date	6/1/2		General W	eather Co	onditions:						
		n Start Time	contir		Clear - ~	65°F- ~72	2°F						
	System Stop Time continuous								oncrete block				
	Total Hr	s Monitored	2	4	General Description of Site Activities:						illow Ave excavation		
					Health &					ump trucks o			
		Calibrations	0		Continuo					ptrucks using			
	(1	Time/Status)	0640-	0905	Site surv					at batch plar			
							he TFS w/ Kil-dust			offsite via du			
								ress wall installation			nch with kil-dust		
					Transpor	ted soil fi	rom excavation alo	ng Willow Ave to the TFS via pave loader			round OU-2 using constr	uction vehicle	
					# of					1inute			
Date	Alert Trigger	Station	Start Time	End Time	15-min Periods	Wind Dir.	Upwind/ Downwind	Upwind Station(s)	Downwind-Upwind Concentration Min** Max**		Site Condition	Site Activity During the Period (if applicable)	Actions Taken
1/2012	None									No exceedances			
nments:													
						PM-10 ((15-min)	TVOC (15-min)		Т	VOC (1-min)	Odor Intensity (15-min)	
			AI	ert Limit:		100 (ug/m ³	3.7 ppm			-	-	
	Action Limit:							5.0 ppm			25 ppm	3 (n-butanol scale)	

 * 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

ppmv - parts per million by volume

Due to equipment malfunction no recordable data is available for FAM#2 from 00:00 - 08:13.

PM-10 - particulate matter (i.e. dust) less than 10 microns in diameter TVOC - total volatile organic compounds NA - not applicable ND - no data available



Field Representative: R. Marshall Date: _______6/1/2012 Page 1 of _1____