

Attachment 1

Community Air Monitoring Plan

Northrop Grumman Corporation, Bethpage, New York.

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Introduction

In accordance with New York State Department of Health (NYSDOH) requirements, this Community Air Monitoring Plan (CAMP) has been prepared for use during certain investigative and remedial field activities associated with the Northrop Grumman Corporation (NGC), Bethpage Facility (Site). This CAMP serves to present the methods and procedures to conduct real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at each designated work area when certain activities are in progress. This CAMP is not intended for use in establishing action levels for worker respiratory protection; action levels are described in the Northrop Grumman Corporation Health and Safety Plan (HASP) (ARCADIS G&M, Inc. 2004). The intent of this CAMP is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers that are not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities that are related to the Site. The response levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, this CAMP helps to confirm that work activities do not spread contamination off-site through the air.

Depending upon the nature of the site-related contaminants of concern, chemical-specific monitoring, with appropriately-sensitive methods, may be required during field work (please refer to the HASP for details).

Reliance on this CAMP does not preclude simple, common-sense measures to keep potential VOCs, dust, and odor emissions at a minimum around work areas.

The following sections of this CAMP present the monitoring instrumentation required to comply with NYSDOH policy, the frequency of monitoring, response levels, and response actions.

Monitoring Instrumentation

Based on the currently available analytical data and the contaminants of concern for the NGC Site, real-time air monitoring for VOCs and particulates at the perimeter areas of the work area (i.e., the exclusion zone – see HASP for definition) will be necessary for field activities associated with investigation and remediation of the NGC Site.

VOC monitoring will be performed using real-time monitoring instrumentation that is appropriate to measure the types of VOCs known or suspected to be present at the work location (please refer to the HASP for details). The equipment will be calibrated on the frequency and using the methods described in the HASP. It is preferable to use instrumentation that is capable of calculating 15-minute running average concentrations or provide a written record of readings taken during monitoring events. If neither capability is available, then the reading obtained every 15 minutes will be used for decision making.

The particulate monitoring will be performed using real-time monitoring instrumentation that is capable of measuring particulates less than 10 micrometers in size (PM-10). It is preferable to use instrumentation that is capable of calculating 15-minute running average concentrations or provide a written record of readings taken during monitoring events. If neither capability is available, then the reading obtained every 15 minutes will be used for decision making. The particulate monitoring equipment will be equipped with an audible alarm to indicate exceedence of the response level.

Monitoring Frequency

This section defines the typical activities that will occur in relation to the NGC Site and relates these activities to the frequency of monitoring required.

Continuous monitoring for VOCs and particulates will be carried out for intrusive activities. Additionally, upwind VOC and particulate concentrations will be measured at the **start** of each work day and **periodically** (see below) thereafter to establish the background concentration. Ground intrusive activities typically include the following:

1. Soil excavation and handling.
2. Test pitting or trenching.
3. Drilling and installation of vertical profile borings, soil borings, and/or wells.
4. During the demolition of contaminated or potentially contaminated structures.
5. Construction activities involving earthwork or disturbance of earthen surfaces.
6. Other activities specified in this CAMP.

Periodic monitoring for VOCs will be carried out during non-intrusive activities.

For non-intrusive activities, the upwind concentrations will be measured at the **start and finish** of the work effort to establish the background concentration. Non-intrusive activities typically include the following:

1. Site Mobilization/Demobilization of equipment and machinery.
2. Drum or container sampling.
3. Soil sampling (to the extent not coinciding with intrusive work).

4. Groundwater sampling.
5. Water-level measurements.
6. Surveying (geophysical, coordinate/elevation).
7. Well development.
8. Waste transportation.
9. Site preparation and restoration that does not involve re-grading or other disturbances to surface materials.

“Periodic” monitoring should be performed, at a minimum as follows:

1. Upon arrival at a work location to determine the ambient, or background concentrations.
2. During each phase of work that potentially may generate VOC emissions to the air.
3. Prior to leaving the work location.

As an example, “Periodic” monitoring for VOCs during sample collection activities shall include monitoring as above and during the following times:

1. When accessing wells, opening drums or containers, or overturning soil.
2. During well bailing/purging.
3. During collection of samples (soil/sediment/water).

For non-intrusive activities, particulate monitoring will not be performed.

Continuous monitoring for VOCs will be carried out during activities that occur on the Bethpage Community Park property.

VOC Monitoring Station Locations, Response Levels, and Actions

During each workday, the VOC monitoring station will be positioned at the downwind perimeter of the work area (i.e., the exclusion zone – see HASP for definition). As stated above, monitoring frequency (periodic or continuous) will be determined based on whether the activity is considered intrusive or non-intrusive (or whether the activity is occurring on Bethpage Community Park property). The direction of wind (if any) will be periodically recorded during each work day and re-positioning of upwind/downwind monitoring stations will be performed accordingly.

The VOC monitoring instrumentation output documenting 15-minute running average concentrations (or printed output of readings taken or the reading taken every 15 minutes, as available), will be compared to the following response levels:

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area exceeds 5 parts per million (ppm) **above background** for the 15-minute average, work activities will be temporarily halted and monitoring continued.

If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities will resume with continued monitoring.

- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm **above background** but less than 25 ppm, work activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities will resume provided that the total organic vapor level 200 feet downwind of the work area or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15- minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shutdown.

All readings will be recorded on the appropriate air monitoring log (please refer to the HASP for details) or the electronic log will be printed out. Air monitoring results will be appended to the appropriate report.

Particulate Monitoring Station Locations, Response Levels, and Actions

For intrusive activities, the particulate (i.e., dust) monitoring station will be positioned at the downwind perimeter of the work zone (i.e., exclusion zone – see HASP for definition). In addition, fugitive dust migration will be visually assessed during all work activities. The direction of wind (if any) will be periodically recorded during each work day and re-positioning of the downwind monitoring station will be performed accordingly. The response levels and actions for fugitive dust are as follows:

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m³) greater **than background** (upwind perimeter) for the 15-minute period or if airborne dust is visually observed leaving the work area, then dust suppression techniques will be employed. Work will continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m³ above the upwind level and provided that no visible dust is observed leaving the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m³ above the **background** concentration, then work will be stopped and a re-evaluation of activities initiated. Work will resume provided that dust suppression measures and/or other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m³ of the upwind level and in preventing visible dust from leaving the work area.

All readings will be recorded on the appropriate air monitoring log (please refer to the HASP for details) or the electronic log will be printed out. Air monitoring results will be appended to the appropriate report.