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23 July 2008

Mr. Scott Serviss
D.A. Collins Environmental Services
101 Route 67, PO Box 191
Mechanicville, New York 12118

VIA ELECTRONIC MAIL (sserviss@dacollins.com)

Re: Review of Personal and Area Air Sampling Data – May 2008 (revised)
Former Bouchard Junkyard Project, New Lebanon, NY
JWA Project No. 0806028

Dear Scott:

Per your request, JWhitehouse & Associates, Inc. has reviewed the three air sampling data sets collected at the Former Bouchard Junkyard project in May and early June as provided to me by DA Collins. The following air data sets were reviewed: LIMT 16333, 16627 and 16628. This data covers personal sampling conducted on May 21 and 23 and area sampling conducted on May 22, 29 and June 2, 2008. The data provided by DA Collins and reviewed by JWhitehouse & Associates included personal air sampling results for PCB (EPA method TO-4A), pesticides (EPA method TO-10), metals (NIOSH method 7300) and dust (NIOSH method 0500) and area samples for dust collected at four perimeter sampling locations. This revised report summarizes the May data review.

Personal Exposure Monitoring

Personal air monitoring data was collected on May 21 and 23. This data represents both short term and full shift personal air sampling collected on project personnel working on the Former Bouchard Junkyard remediation project site. Sampling was conducted on various project personnel for PCB, pesticides, metals and total dust. The findings of this data review are summarized below.

Based on the personal air sample data received, the modified level D personal protective equipment (PPE) ensemble established for the work site is appropriate for project personnel. All personal exposure monitoring results were either at or below the reporting limit of the analytical methods and thus well below the applicable OSHA Permissible Exposure Limits (PEL) and project action levels.

Metals

Personal air sampling for metals included analysis for the following metals; silver, arsenic, barium, cadmium, chromium, lead and selenium. All metal exposure results were below the reporting limit of the NIOSH 7300 analytical method with one exception. Chromium was

detected at a concentration slightly above the reporting limit on one of the personal samples collected on May 21. This result was 2.6 ug/m^3 , which is well below the OSHA PEL for chromium metal of 50 ug/m^3 . The personal samples collected do not indicate any metal exposures approaching the respective OSHA permissible exposure limits (PEL).

The NIOSH 7300 method for metals has a recommended air sampling flow rate of 1 to 4 liters per minute (lpm). The chain of custody for the personal samples submitted for metals analysis indicates that the Bouchard Junkyard samples were collected at a flow rate of 0.5 lpm. This flow rate should be increased to at least 1 lpm (a flow rate of 2 lpm is commonly used for metals) to follow the recommended sampling methodology and also to increase each sample volume. The increased sample volume will result in a lower reporting limit on the analytical results.

Dust

Two personal samples for dust were collected on May 21 and analyzed via NIOSH method 0500. Both sample results were below the analytical reporting limit and were reported as <0.223 and <0.633 milligrams per cubic meter (mg/m^3). These results are below the OSHA PEL of 5 mg/m^3 for respirable dust and 15 mg/m^3 for total dust. Although there was no dust identified above the reporting limit on these samples, the reporting limit for the samples is relatively high due to the air volume collected on the samples. To ensure a reporting limit as low as possible, a longer sample time and/or higher sample volume should be utilized for future dust samples. Dust sampling is normally conducted at a flow rate of approximately 2 lpm. It was noted on the chain of custody that these samples were collected at a flow rate of 0.5 lpm. Increasing the sampling flow rate to 2 lpm will increase the sample volume and thus decrease the reporting limit for the dust samples.

PCB

No PCB were detected on the two personal samples collected during this monitoring period. Both results were reported as less than ($<$) the reporting limits ($<2.49 \text{ ug/m}^3$ for one sample and $<0.889 \text{ ug/m}^3$ for the second sample). These results are well below the established OSHA PEL for PCB 1242 and 1254 of 100 ug/m^3 and 50 ug/m^3 respectively.

Pesticides

Personal samples for pesticides in air (EPA method TO-10) were collected on May 21 and 23. The samples were collected and analyzed for 22 pesticides (4,4-DDD, 4,4-DDE, 4,4-DDT, Alachlor, Aldrin, alpha-BHC, beta-BHC, Chlordane, delta-BHC, Dieldrin, Endosulfan I, Endosulfan II, Endosulfan Sulfate, Endrin, Endrin Aldehyde, Endrin Ketone, gamma-BHC (Lindane), Heptachlor, Heptachlor Epoxide, Hexachlorobenzene, Methoxychlor and Toxaphene). No pesticides were detected on the two samples submitted for analysis. All sample results were reported as less than ($<$) the detection limit for the analytical method.

Area Air Monitoring

Area air monitoring was collected at four stationary locations on May 22, May 29 and June 2. The samples were collected and analyzed for dust via NIOSH method 0500. These samples were typically collected for six to seven hours of the work shift in stationary locations around the project site. Although it does not appear that there is a concern for airborne dust levels detected at these stationary locations, the reportable limit of detection is relatively high due to the air volume collected on the samples. It is recommended that the air flow rate for these samples be increased from 0.5 lpm to at least 2 lpm. This will increase the sample volume, decrease the reportable limit of detection and offer a better representation of actual dust levels.

Dust

Three sets of area dust samples were received from sampling conducted in May and early June. All sample results, with the exception of two samples (Stations 1 and 3) collected on May 29, were reported as less than the laboratory reportable limit. The two detectable dust results were 0.710 mg/m³ at Station 1 and 0.937 mg/m³ at Station 3 on May 29. Since no background dust data is available for review/comparison and personal dust monitoring data was below the analytical reporting limit and well below the OSHA PEL for dust, it is suggested that this data be utilized to assist in establishing a background dust level for the project and subsequent data be compared against these results.

In the remaining area samples collected, although there was no dust identified above the reporting limit, the reporting limit for the samples is relatively high and as mentioned previously, a longer sample time and/or higher sample volume should be utilized for future dust samples. Dust sampling is normally conducted at a flow rate of approximately 2 lpm. It was noted on the chain of custody that these samples were collected at a flow rate of 0.5 lpm. Increasing the sampling flow rate to 2 lpm will increase the sample volume and thus decrease the reporting limit for the dust samples.

JWhitehouse & Associates appreciates the opportunity to work with DA Collins Environmental on the review of the Former Bouchard Junkyard project air monitoring data. Please give me a call if there are any questions.

Sincerely,

Jane M. Whitehouse, CIH, CSP
President and Principal Consultant

cc: Dave MacDougall