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COMMUNITY AIR MONITORING PLAN (CAMP)

Former Rickett's Dry Cleaner Site
2017-2019 Doubleday Avenue
Town of Milton, Village of Ballston Spa, NY
DEC Site ID #546058

Prepared For:

Contract# D009808, Work Assignment No. 2
New York State Department of Environmental Conservation
Division of Environmental Remediation
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Albany, New York 12233-7012

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HRP #: DEC1002.P3

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Project/Site Information:

Former Rickett's Dry Cleaners
2017-2019 Doubleday Avenue
Town of Milton, Village of Ballston Spa
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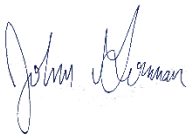

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I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Mark Wright, CSP, PG - Project Manager

1.0 GENERAL

1.1 Overview

This Community Air Monitoring Plan (CAMP) fulfills the requirements set forth by the New York State Department of Health (NYSDOH) Generic Community Air Monitoring Plan, dated June 2000 (**Appendix A**), and New York State Department of Environmental Conservation (NYSDEC) DER-10 Fugitive Dust Suppression and Particulate Monitoring Program at Inactive Hazardous Waste Sites (**Appendix B**). The intent of this CAMP is to provide a measure of protection for the downwind community (mostly residential properties) during the demolition of the buildings of the former Rickett's Dry Cleaner Site (the Site) located at 2017-2019 Doubleday Avenue, Ballston Spa, New York. Additional details regarding the demolition of Site buildings are provided in the Interim Remedial Measure Scope of Work - Building Demolition Work Plan prepared by HRP for the NYSDEC dated September 1, 2021. Details regarding the building demolition plan are provided in **Figure 1**.

A pre-demolition asbestos survey indicated the presence of friable and not friable asbestos containing materials. The completion and monitoring of asbestos related activities will be completed in accordance with New York State Department of Labor (DOL) Code 56 (12 NYCRR Part 56) and approved variances. The approved variance is includes as **Appendix C.**

A third-party project monitor will be contracted by the demolition contractor to provide continual air monitoring prior to and throughout the asbestos abatement and building demolition. The project monitor will provide full time oversight of the asbestos contractor during all abatement activities to ensure that no visible emissions are generated. If visible emissions are generated work practices will be altered according to the project monitors recommendations.

The requirements in this CAMP will be in effect during all building demolition activities.

1.2 Site Description

The Site is approximately 1.3 acres in size, according to the Saratoga County online GIS map viewer. Two buildings are present on the Site, (1) a former dry-cleaning/laundromat two-story building originally constructed in 1930 totaling approximately 22,024 square feet and (2) a self-serve car wash building constructed in 1983 totaling approximately 2,250 square feet. Site operations were reported to have ceased in 2013 and the property is inactive. The Tax Map ID for the property is listed as 203.72-2-11. The owner of the property is listed by the Saratoga County Tax Assessor's online database as "Ricketts Inc." The Site is zoned for commercial use, and surrounding properties in the area are primarily residential.

Dry cleaning operations were performed on the Site by Rickett's Laundry/Rickett's Fabric Care Services/Rickett's Inc. from at least 1950 until 2013. Environmental investigations performed at the Site between 2008 and 2021 identified chlorinated volatile organic compounds (VOCs) in groundwater samples and in soil gas samples at concentrations exceeding applicable clean-up criteria. Tetrachloroethene (PCE) has been detected in Site groundwater at concentrations up to 3,700 micrograms per Liter (µg/L) and trichloroethene (TCE) up to 1,300 µg/L, both above their New York State Ambient Water Quality Standard (TOGS 1.1.1) criteria of 5 µg/L. Associated reductive de-

chlorination by-products, including trans-1,2-dichloroethene, cis-1,2-dichloroethene, and vinyl chloride have also been detected at concentrations above the relevant standards in samples collected from the Site. Data from previous investigations indicate that the groundwater plume at the Site is likely to originate beneath the dry-cleaning building.

1.3 Potential Air Emissions Related to Site Investigation/Remedial Activities

ACM abatement and building demolition activities conducted at the Site have the potential to generate localized impacts to air. These activities can include any building demolition, truck loading, and building material crushing. All demolition activities with the potential to impact air quality are subject to this CAMP.

1.4 Air/Odor Emissions and Control Measures

Air emissions control and fugitive dust suppression techniques will be used during demolition activities to reduce the migration of emissions offsite. During intrusive, non-intrusive, and demolition activities, odor and dust control will be taken when necessary. Odor and dust suppression techniques are determined based on air monitoring results. Examples of these techniques include applying water to structures, material piles, access roads, excavation buckets, equipment, excavation pits, reducing vehicle speeds to ten (10) miles per hour, reducing the number of excavations and exposed soils, covering soils with polyethylene sheeting, and tarping excavated pits, stockpiles, and trucks.

Water applications are to be used in amounts that prevent soaking or slip hazards. Atomizing sprays can be used in place of water and effectively suppress dust. Polyethylene sheeting can be used to prevent VOC odors and emissions. Odor control measures will be implemented based on visual and olfactory observations. Dust control measures will be implemented based on both visual observations and air monitoring.

2.0 AIR MONITORING PROCEDURES— INVESTIGATION/REMEDIATION/REDEVELOPMENT

2.1 General

Real-time air monitoring will be implemented at the Site for VOCs and particulate matter less than ten (10) microns in diameter (PM-10) during demolition activities. Each day, a work area boundary will be established in order to determine the bounds of air monitoring. Wind direction will be recorded daily through the use of a weather station, windsock, or wind vane for the purpose of establishing an upwind station and a downwind station. At minimum, one upwind and one downwind CAMP stations will be set every day of demolition activities. Baseline air sampling will take place prior to the beginning of work each day.

2.2 Sampling Location Selection

CAMP sampling activities will be determined daily based on wind direction and expected workday activities. The upwind location will be established at the beginning of each day. The purpose of the upwind location is to establish a baseline level of VOCs and PM-10 that are present in the air and independent of Site demolition activities. The downwind location will provide information regarding any VOCs or PM-10 emissions from the Site. Should the wind direction change by more than 60 degrees from the established morning direction, both CAMP stations will be adjusted. Any location changes will be documented in field logs.

2.3 VOCs Monitoring

VOCs will be continuously monitored during demolition activities with instrumentation equipped with data logging capabilities. A MiniRae 3000 (or equivalent) device will be used to conduct real-time VOC monitoring. Detailed information on the MiniRae 3000 is included in **Appendix D**. All fifteen (15)-minute readings will be recorded, as well as any instantaneous readings taken to facilitate activity decisions.

2.4 Particulate Matter Monitoring

Real time particulate matter will be continuously monitored during demolition activities with instrumentation equipped with data logging capabilities. A TSI DustTrak II 8530 Dust/Aerosol unit (or equivalent) will be used to conduct real-time PM-10 monitoring. Detailed information on the TSI DustTrak II is provided in **Appendix D.** All fifteen (15)-minute readings will be recorded, as well as any instantaneous readings taken to facilitate activity decisions.

2.5 Action Levels

Action levels will be used to initiate response actions, if necessary, based on real-time air monitoring of PM-10 and VOCs. The following sections detail specific levels that will be used.

2.5.1 Particulate Air Monitoring

A minimum of three (3) real-time particulate monitoring stations capable of measuring particulates less than ten (10) micrometers in size and capable of taking fifteen (15)-minute averages will be utilized. The instruments will be set within protective enclosures whose locations will be determined by wind direction at the beginning of each day. One (1) upwind station and two (2) downwind stations will be set. Additional downwind stations may be utilized during the demolition of certain parts of the main dry cleaner building.

The particulate monitoring station instruments will be capable of displaying the short-term exposure limit (STEL) and fifteen (15)-minute averaging period, which can be evaluated against the NYSDOH Generic and Special Requirements Community Air Monitoring Plan action levels for particulates, listed below. These instruments are programmed to alarm at preset action levels. At the end of each day, readings for each instrument will be downloaded to a computer and retained for future reference and reporting. The particulate monitoring data collected during demolition and site activities will be submitted to the NYSDEC and NYSDOH daily by the end of the following business day.

- If the downwind PM-10 level is 100 micrograms per cubic meter (mcg/m^3) greater than background levels taken from the upwind location for a fifteen (15)-minute period, then dust suppression techniques must be employed and corrective action taken to protect onsite personnel. If visible airborne dust is observed leaving the work area, suppression techniques must be employed. Work may continue with dust suppression techniques provided PM-10 particulate levels do not exceed 150 mcg/m^3.

- If downwind PM-10 levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and re-evaluated. Work can resume provided dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to below 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

If visible dust is seen leaving the Site regardless of PM-10 levels picked up by the air monitoring equipment, additional dust suppression techniques must be employed.

In the event of heavy rain, particulate monitoring will not be performed for the protection of the equipment. Heavy rain would limit the effectiveness of the sensors in the equipment and act as a suppressor of particulates. In the event of extreme wind conditions that make dust control ineffective, work activities may need to be suspended. Work activities will be stopped and modified if fugitive dust migration is observed during poor weather conditions.

2.5.2 Volatile Organic Compound Air Monitoring

Continuous VOC monitoring at the downwind perimeter of the work area with a MiniRae 3000 11.7 electroVolt lamp or equivalent device will be utilized. The VOC monitoring devices will be placed in an enclosure containing the particulate monitor device. The VOC monitoring devices will be capable of displaying the STEL and fifteen (15)-minute averaging period, which can be evaluated against the NYSDOH Generic and Special Requirements Community Air Monitoring Plan action levels for particulates, listed below. The downwind VOC STEL readings will be downloaded to a computer and

retained for future reference and reports. Additional downwind stations may be used during the demolition of the main dry-cleaning building.

Upwind VOC STEL concentrations will be measured at the start of the workday, and periodically thereafter using the upwind monitoring station VOC monitor to evaluate the Site's background conditions. The start of workday upwind VOC STEL readings will be manually recorded for future reference and reports. At the end of each day, readings for each instrument will be downloaded to a computer and retained for future reference and reporting. VOC data collected during demolition and site activities will be submitted to the NYSDEC and NYSDOH daily by the end of the following business day.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds five (5) parts per million (ppm) above background fifteen (15)-minute levels, work activities must be temporarily stopped. If the total organic vapor level decreases below five (5) ppm over background levels, work can 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 five (5) ppm over background but less than twenty-five (25) ppm, work activities will be halted, the source of the vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less- but in no case less than twenty (20) feet, is below five (5) ppm over background for the fifteen (15)-minute average.

- If the organic vapor level is above twenty-five (25) ppm at the perimeter of the work area, activities will be shutdown. Activities will then be evaluated to determine the source of the organic vapors. Engineering controls will be evaluated to reduce or eliminate the vapors.

2.5.3 Special Requirements Community Air Monitoring Program

2.5.3.1. Special Requirements for Work within Twenty (20) feet of Potentially Exposed Individuals or Structures

When work areas are within twenty (20) feet of potentially exposed populations or occupied structures, the continuous monitoring locations for VOCs and particulates must reflect the nearest potentially exposed individuals and the location of ventilation system intakes for nearby structures. The use of engineering controls such as vapor/dust barriers, temporary negative-pressure enclosures, or special ventilation devices will be considered to prevent exposures related to the work activities. Consideration will be given to implementing the planned activities when potentially exposed populations are likely to be lower, such as during weekends or evening hours in non-residential settings.

2.6 Meteorological Monitoring

Wind direction is meteorological information considered relevant for demolition activities and CAMP. Meteorological monitoring will be conducted at the Site using a weather station, a windsock, wind vane, or other equivalent equipment. Wind direction will be established at the start of every workday and may be reestablished at any point during the workday where a significant wind change is noted. CAMP stations should be shifted accordingly. As stated, rain or precipitation events may eliminate the need for particulate monitoring as dust generation is suppressed naturally and can damage CAMP equipment.

2.7 Instrument Calibration

Calibration of the MiniRae 3000 and DustTrak II devices will occur in accordance with the equipment manufacturer's calibration and quality assurance requirements. Ideally the devices will be calibrated before the start of work each day. Calibration logs will be completed daily and saved for future reports.

3.0 MONITORING SCHEDULE AND DATA COLLECTION AND REPORTING

3.1 General

The proposed monitoring schedule, data collection, and reporting requirements are discussed below.

3.2 Monitoring Schedule

Real-time VOC and PM-10 monitoring will be conducted continuously throughout the demolition activities. VOC monitoring will be performed during non-intrusive activities. Calibration will occur daily before the start of workday activities. Wind direction monitoring will occur daily before the start of workday activities and can occur at any appropriate time during demolition activities.

3.3 Data Collection and Reporting

Air monitoring data will be collected continuously from VOC and PM-10 monitors during building demolition and intrusive Site activities through the use of an electronic data logging system built into the CAMP equipment. The data management software will be set up so that instantaneous readings would be recorded and averaged over fifteen (15)-minute periods. Any CAMP recordings (instantaneous or 15-minute averages) that influence demolition activities will be archived for review by NYSDEC and NYSDOH personnel. The data will be derived from the CAMP equipment via flash drive, uploaded, and emailed to the NYSDEC and NYSDOH by the end of the following business day.

The CAMP data generated during demolition will be presented in the post-demolition report, which will be provided to NYSDEC as a separate document 90 days following the final completion of the work.

4.0 CONTROLLED DEMOLITION WITH ACM IN PLACE

As detailed in the IRM Demolition work plan, the Site buildings will be divided into four (4) separate demolition areas. Section 1 and Section 3A include the former washer area and the northernmost portion of the dry cleaners. A portion of Section 3A includes friable thermal insulation that will be abated. Section 1 and 3A are to be demolished with non-friable asbestos containing material (ACM) in place. As it relates to air monitoring, the following provides a general summary of the requirements for air monitoring, Site security, regulated areas, and controlled demolition removals.

4.1 Air Monitoring and Sampling

A full-time independent project monitor shall be onsite to monitor asbestos abatement contractor work methods during all abatement activities to ensure compliance with ICR 56 and variance conditions and to ensure that no visible emissions are generated. A copy of the Site-specific variance detailing subcontractor specific monitoring activities is included in **Appendix D**. If visible emissions are observed, work practices shall be altered according to the project monitor's recommendations.

The project monitor shall perform the following functions during asbestos abatement projects in addition to functions already required by ICR-56:

- Inspection of the interior of the asbestos project work area made at least twice every work shift accompanied by the asbestos supervisor.
- Observe and monitor the activities of the asbestos abatement contractor to determine that proper work practices are used and are in compliance with all asbestos laws and regulations.
- Inform the asbestos abatement contractor of work practices that, in the project monitor's opinion, pose a threat to the public health or the environment, and are not in compliance with ICR-56 and / or approved variances or other applicable rules and regulations.
- Document in the project monitor log observations and recommendations made to the asbestos supervisor based upon the interior/exterior observations of the asbestos project made by the project monitor.

In addition to the requirement of Subpart 56-4.9(c), air monitoring shall be conducted daily at the perimeter of the work area.

A minimum of two (2) upwind air samples shall be collected. The samples shall be spaced approximately 30 degrees apart from the prevailing wind direction.

A minimum of three (3) downwind samples shall be collected. The samples shall be equally spaced in a 120degree arc downwind from the source.

The contractor shall observe at a minimum, the following waiting (settling/drying) periods: Demolition- two (2) hours.

If more than one (1) shift daily is required to accomplish the work, air monitoring within the work area during the abatement shall be performed on each shift.

In lieu of post-abatement clearance air monitoring in compliance with ICR-56-9.2(d), the most recent daily abatement air samples collected during removal and cleaning operations in the regulated work area, shall be used for comparison with ICR 56-4.11 clearance criteria. All other provisions of ICR-56-4 shall be followed for the duration of the abatement project.

After removal and cleanings are complete and a minimum drying period has elapsed, a qualified project monitor shall determine if the area is dry and free of visible asbestos debris/residue. If the area is determined to be acceptable and the most recent daily abatement air sample results meet 56-4.11 clearance criteria, the final dismantling of the Site may begin.

4.2 Site Security and Regulated Areas

The entire controlled demolition area and all surrounding portions of the Site to be utilized for demolition cleanup, staging areas, and regulated abatement work areas shall be enclosed within a barrier or fence. The intent of this barrier to define the restricted area at the Site, alert the public to asbestos work and associated hazards, and to prevent unauthorized entry onto the Site.

Signage in accordance with the requirements of ICR 56-7.4(c) shall be posted on the exterior of the work fence to warn the public of the asbestos hazard.

The regulated work areas, decontamination units, airlocks, and dumpster areas shall be closed off from the public at a distance of 25 feet where possible. Only certified workers will be allowed access to portions of the Site until air monitoring results have been achieved or abatement is completed. These areas shall be marked out appropriately in accordance with Subpart 56-7.4(c). For areas where 25 feet distances cannot be achieved, the areas shall be closed off practically and a daily abatement air sample shall be included at the reduced barrier.

Entry/exit of all persons and equipment shall be through one designated and secure "doorway" in the barrier or fence which provides an appropriate means of egress from the Site.

Adjacent building openings within 25 feet of the outermost limit of the disturbance shall be sealed with two (2) layers of six (6) mil fire retardant plastic sheeting. A daily abatement air sample shall be included within ten (10) feet of the affected portion of the adjacent building.

4.3 Controlled Demolition Removals

The provisions of 56-11.5 shall be followed for non-friable controlled demolition removals.

Decontamination system enclosure and areas shall be constructed and utilized as per the requirements laid out in 56-7.5(d) and 56-11.5.

Uncertified personnel shall not be allowed to access any regulated abatement work area, with the exception of waste hauler truck drivers. These truck drivers will be restricted to their enclosed cab while temporarily in the regulated work area for waste transfer activities only. All equipment operators utilized for demolition or removal activities within the regulated work area must be certified in compliance with ICR 56-3.2.

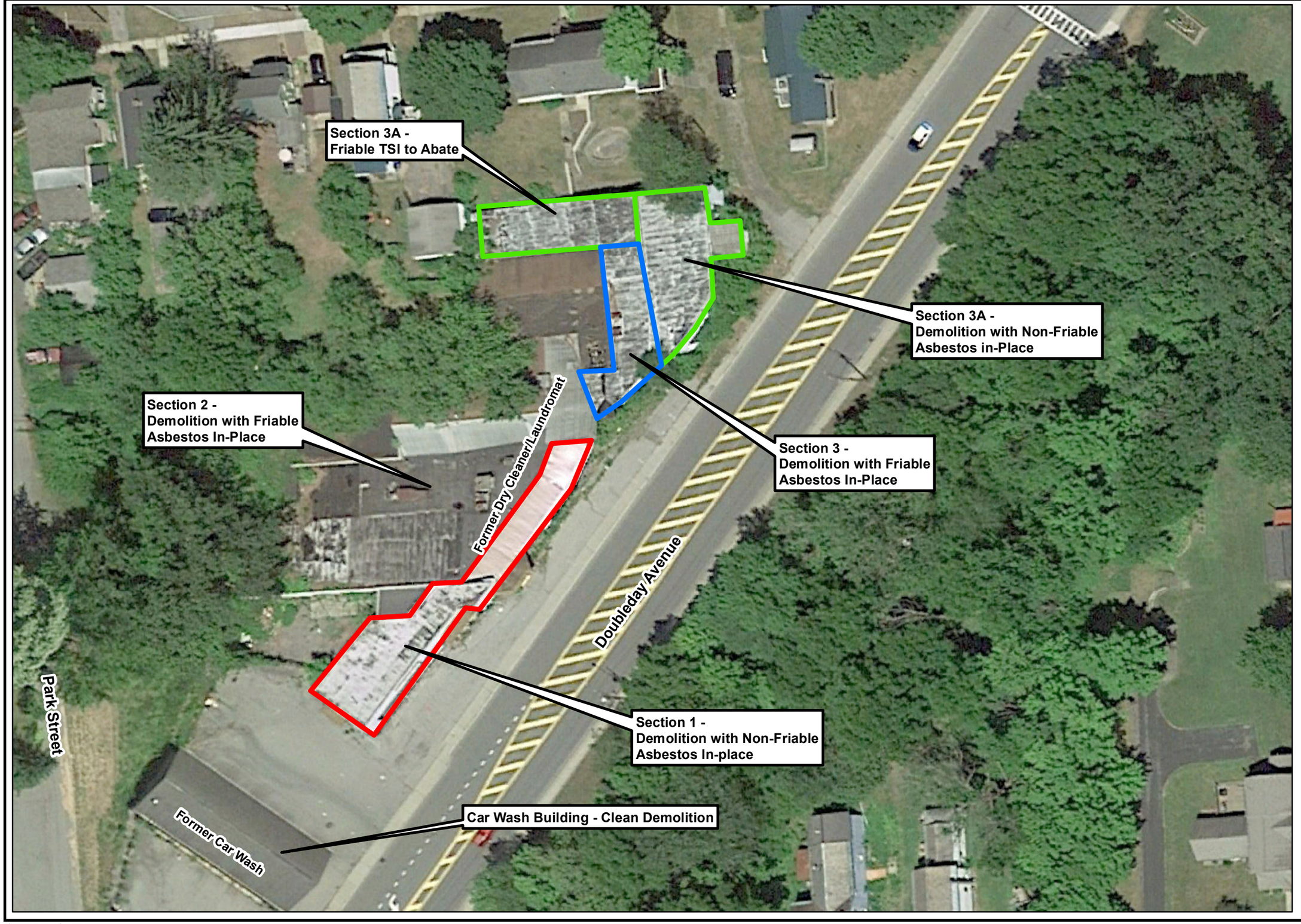
No dry disturbance or removal of asbestos material shall be permitted.

Wastewater shall be confined within the controlled demolition area. Water may be allowed to accumulate in basements during the demolition activities.

All decontamination areas shall be within the regulated abatement work area. An equipment decontamination area shall be closed off within the worksite for heavy equipment including backhoes, excavators, and loaders. The ground surface in this decontamination area shall be banked on the sides to confine the contaminated wastewater.

All barrier components, used filters, disposable personal protective equipment (PPE) and similar items shall be considered to be ACM/asbestos contaminated waste and disposed of accordingly.

FIGURES



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Designed By:	Drawn By:	Reviewed By:
JG	BOB	MEW

Issue Date:	Project No:	Sheet Size:
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Building Demolition Plan

Rickett's Dry Cleaners
(Site #546058)

2017-2019 Doubleday Avenue
Ballston Spa (Milton), New York

FIGURE

1

Path: S:\Data\NYDEC - NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION\MILTON\2017 DOUBLEDAY AVENUE, BALLSTON SPA (MILTON), NY\DEC1002P3\GIS\Figure 3 - Main Dry Cleaner Building Sectioning.mxd

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APPENDIX A

NYSDOH Generic Community Action Monitoring Plan

Appendix 1A
New York State Department of Health
Generic Community Air Monitoring Plan

Overview

A Community Air Monitoring Plan (CAMP) requires real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of investigative and remedial work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

The generic CAMP presented below will be sufficient to cover many, if not most, sites. Specific requirements should be reviewed for each situation in consultation with NYSDOH to ensure proper applicability. In some cases, a separate site-specific CAMP or supplement may be required. Depending upon the nature of contamination, chemical- specific monitoring with appropriately-sensitive methods may be required. Depending upon the proximity of potentially exposed individuals, more stringent monitoring or response levels than those presented below may be required. Special requirements will be necessary for work within 20 feet of potentially exposed individuals or structures and for indoor work with co-located residences or facilities. These requirements should be determined in consultation with NYSDOH.

Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

Community Air Monitoring Plan

Depending upon the nature of known or potential contaminants at each site, real-time air monitoring for VOCs and/or particulate levels at the perimeter of the exclusion zone or work area will be necessary. Most sites will involve VOC and particulate monitoring; sites known to be contaminated with heavy metals alone may only require particulate monitoring. If radiological contamination is a concern, additional monitoring requirements may be necessary per consultation with appropriate DEC/NYSDOH staff.

Continuous monitoring will be required for all ground intrusive activities and during the demolition of contaminated or potentially contaminated structures. Ground intrusive activities include, but are not limited to, soil/waste excavation and handling, test pitting or trenching, and the installation of soil borings or monitoring wells.

Periodic monitoring for VOCs will be required during non-intrusive activities such as the collection of soil and sediment samples or the collection of groundwater samples from existing monitoring wells. “Periodic” monitoring during sample collection might reasonably consist of taking a reading upon arrival at a sample location, monitoring while opening a well cap or

overturning soil, monitoring during well baling/purging, and taking a reading prior to leaving a sample location. In some instances, depending upon the proximity of potentially exposed individuals, continuous monitoring may be required during sampling activities. Examples of such situations include groundwater sampling at wells on the curb of a busy urban street, in the midst of a public park, or adjacent to a school or residence.

VOC Monitoring, Response Levels, and Actions

Volatile organic compounds (VOCs) must be monitored at the downwind perimeter of the immediate work area (i.e., the exclusion zone) on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities must be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring.

2. If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities can resume provided that the total organic vapor level 200 feet downwind of the exclusion zone 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.

3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shutdown.

4. All 15-minute readings must be recorded and be available for State (DEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the exclusion zone at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter (mcg/m^3) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 mcg/m^3 above the upwind level and provided that no visible dust is migrating from the work area.

2. If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m^3 above the upwind level, work must be stopped and a re-evaluation of activities initiated. Work can resume provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 mcg/m^3 of the upwind level and in preventing visible dust migration.

3. All readings must be recorded and be available for State (DEC and NYSDOH) and County Health personnel to review.

December 2009

APPENDIX B

NYSDEC DER-10, Fugitive Dust Suppression and Particulate Monitoring Programs at Inactive Hazardous Waste Sites

Appendix 1B
Fugitive Dust and Particulate Monitoring

A program for suppressing fugitive dust and particulate matter monitoring at hazardous waste sites is a responsibility on the remedial party performing the work. These procedures must be incorporated into appropriate intrusive work plans. The following fugitive dust suppression and particulate monitoring program should be employed at sites during construction and other intrusive activities which warrant its use:

1. Reasonable fugitive dust suppression techniques must be employed during all site activities which may generate fugitive dust.

2. Particulate monitoring must be employed during the handling of waste or contaminated soil or when activities on site may generate fugitive dust from exposed waste or contaminated soil. Remedial activities may also include the excavation, grading, or placement of clean fill. These control measures should not be considered necessary for these activities.

3. Particulate monitoring must be performed using real-time particulate monitors and shall monitor particulate matter less than ten microns (PM10) with the following minimum performance standards:

(a) Objects to be measured: Dust, mists or aerosols;
(b) Measurement Ranges: 0.001 to 400 mg/m3 (1 to 400,000 :ug/m3);
(c) Precision (2-sigma) at constant temperature: +/- 10 :g/m3 for one second averaging; and +/- 1.5 g/m3 for sixty second averaging;
(d) Accuracy: +/- 5% of reading +/- precision (Referred to gravimetric calibration with SAE fine test dust (mmd= 2 to 3 :m, g= 2.5, as aerosolized);
(e) Resolution: 0.1% of reading or 1g/m3, whichever is larger;
(f) Particle Size Range of Maximum Response: 0.1-10;
(g) Total Number of Data Points in Memory: 10,000;
(h) Logged Data: Each data point with average concentration, time/date and data point number
(i) Run Summary: overall average, maximum concentrations, time/date of maximum, total number of logged points, start time/date, total elapsed time (run duration), STEL concentration and time/date occurrence, averaging (logging) period, calibration factor, and tag number;
(j) Alarm Averaging Time (user selectable): real-time (1-60 seconds) or STEL (15 minutes), alarms required;
(k) Operating Time: 48 hours (fully charged NiCd battery); continuously with charger;
(l) Operating Temperature: -10 to 50^{o} C (14 to 122^{o} F);
(m) Particulate levels will be monitored upwind and immediately downwind at the working site and integrated over a period not to exceed 15 minutes.

4. In order to ensure the validity of the fugitive dust measurements performed, there must be appropriate Quality Assurance/Quality Control (QA/QC). It is the responsibility of the remedial party to adequately supplement QA/QC Plans to include the following critical features: periodic instrument calibration, operator training, daily instrument performance (span) checks, and a record keeping plan.

5. The action level will be established at 150 ug/m3 (15 minutes average). While conservative,

this short-term interval will provide a real-time assessment of on-site air quality to assure both health and safety. If particulate levels are detected in excess of 150 ug/m3, the upwind background level must be confirmed immediately. If the working site particulate measurement is greater than 100 ug/m3 above the background level, additional dust suppression techniques must be implemented to reduce the generation of fugitive dust and corrective action taken to protect site personnel and reduce the potential for contaminant migration. Corrective measures may include increasing the level of personal protection for on-site personnel and implementing additional dust suppression techniques (see paragraph 7). Should the action level of 150 ug/m3 continue to be exceeded work must stop and DER must be notified as provided in the site design or remedial work plan. The notification shall include a description of the control measures implemented to prevent further exceedances.

6. It must be recognized that the generation of dust from waste or contaminated soil that migrates off-site, has the potential for transporting contaminants off-site. There may be situations when dust is being generated and leaving the site and the monitoring equipment does not measure PM10 at or above the action level. Since this situation has the potential to allow for the migration of contaminants off-site, it is unacceptable. While it is not practical to quantify total suspended particulates on a real-time basis, it is appropriate to rely on visual observation. If dust is observed leaving the working site, additional dust suppression techniques must be employed. Activities that have a high dusting potential--such as solidification and treatment involving materials like kiln dust and lime--will require the need for special measures to be considered.

7. The following techniques have been shown to be effective for the controlling of the generation and migration of dust during construction activities:

(a) Applying water on haul roads;
(b) Wetting equipment and excavation faces;
(c) Spraying water on buckets during excavation and dumping;
(d) Hauling materials in properly tarped or watertight containers;
(e) Restricting vehicle speeds to 10 mph;
(f) Covering excavated areas and material after excavation activity ceases; and
(g) Reducing the excavation size and/or number of excavations.

Experience has shown that the chance of exceeding the 150ug/m3 action level is remote when the above-mentioned techniques are used. When techniques involving water application are used, care must be taken not to use excess water, which can result in unacceptably wet conditions. Using atomizing sprays will prevent overly wet conditions, conserve water, and provide an effective means of suppressing the fugitive dust.

8. The evaluation of weather conditions is necessary for proper fugitive dust control. When extreme wind conditions make dust control ineffective, as a last resort remedial actions may need to be suspended. There may be situations that require fugitive dust suppression and particulate monitoring requirements with action levels more stringent than those provided above. Under some circumstances, the contaminant concentration and/or toxicity may require additional monitoring to protect site personnel and the public. Additional integrated sampling and chemical analysis of the dust may also be in order. This must be evaluated when a health and safety plan is developed and when appropriate suppression and monitoring requirements are established for protection of health and the environment.

APPENDIX C

Approved DOL Variance Petition, File No. 21-1322

STATE OF NEW YORK
DEPARTMENT OF LABOR
STATE OFFICE BUILDING CAMPUS
ALBANY, NEW YORK 12240-0100

Variance Petition

of

Paradigm Environmental, LLC
Petitioner's Agent on Behalf of

USEPA Region 2
Petitioner

in re

Premises: Ricketts Dry Cleaner Buildings-As listed
County Route 50
Ballston Spa, NY

Controlled Demolition of Structures with Non-Friable ACM to Remain

File No. 21-1322

DECISION

Cases 1-5

ICR 56

The Petitioner, pursuant to Section 30 of the Labor Law, having filed Petition No. 21-1322 on November 12, 2021, with the Commissioner of Labor for a variance from the provisions of Industrial Code Rule 56 as hereinafter cited on the grounds that there are practical difficulties or unnecessary hardship in carrying out the provisions of said Rule; and the Commissioner of Labor having reviewed the submission of the petitioner dated October 4, 2021; and

Upon considering the merits of the alleged practical difficulties or unnecessary hardship and upon the record herein, the Commissioner of Labor does hereby take the following actions:

Case No. 1	ICR 56-4.9 (a, d)
Case No. 2	ICR 56-5.1 (c)

Case No. 3	ICR 56-11.5 (c) (2)
Case No. 4	ICR 56-11.5 (c) (7)
Case No. 5	ICR 56-11.5 (c) (11)

VARIANCE GRANTED. The Petitioner's proposal for the controlled demolition of the subject structures in accordance with the attached 9-page stamped copy of the Petitioner's submittal, is accepted; subject to the Conditions noted below:

THE CONDITIONS

Full-Time Project Monitor:

1. A full-time independent project monitor shall be on site and responsible for oversight of the abatement contractor during all abatement activities to ensure compliance with ICR 56 and variance conditions and to ensure that no visible emissions are generated. If visible emissions are observed, work practices shall be altered according to the project monitor's recommendations.

2. The Project Monitor shall perform the following functions during asbestos abatement projects in addition to functions already required by ICR-56:

    a. Inspection of the interior of the asbestos project work area made at least twice every work shift accompanied by the Asbestos Supervisor;
    b. Observe and monitor the activities of the asbestos abatement contractor to determine that proper work practices are used and are in compliance with all asbestos laws and regulations;
    c. Inform the asbestos abatement contractor of work practices that, in the Project Monitor's opinion, pose a threat to public health or the environment, and are not in compliance with ICR-56 and/or approved variances or other applicable rules and/or regulations;
    d. Document in the Project Monitor Log observations and recommendations made to the Asbestos Supervisor based upon the interior/exterior observations of the asbestos project made by the PM.

3. The PM shall alert the local District Office of the NYSDOL Asbestos Control Bureau whenever, after the PM has provided recommendations to the Asbestos Supervisor, unresolved conditions remain at the asbestos project site which present a significant potential to adversely affect human health or the environment.

Perimeter Air Sampling (During Demolition):

4. In addition to the requirement of Subpart 56-4.9(c), air monitoring shall be conducted daily at the perimeter of the work area.

5. A minimum of two upwind air samples shall be collected. The samples shall be spaced 30 degrees apart from the prevailing wind direction.

6. A minimum of three downwind samples shall be collected. The samples shall be equally spaced in a 120-degree arc downwind from the source.

7. If more than one shift daily is required to accomplish the work, air monitoring within the work area during abatement shall be performed on each shift.

Work Practices:

8. Demolition work shall comply with ICR 56-11.5 except as modified by this variance.

9. For areas where compliance with the twenty-five feet barrier/fence requirement isn't possible, the areas shall be cordoned off to the maximum distance possible, and a daily abatement air sample shall be taken at the reduced barrier.

10. If the owner of an adjacent building (within 25 feet) does not allow openings to be sealed as required, the asbestos abatement contractor's supervisor must document the issue within the daily project log and will have the affected building owner sign the log confirming that the owner will not allow the asbestos abatement contractor to seal the openings in the building as required. In addition, a daily abatement air sample shall be included within ten feet of the affected portion of the adjacent building.

Soil/Earth/Dirt Cleanup:

11. After demolition debris has been removed, the site shall be inspected. Any required cleanup shall include all visible asbestos or suspect asbestos debris. Soil removal shall meet ASTM 1368 (latest edition), Section 9.1.1-9.1.5 inspection criteria.

12. No pieces of ACM shall be present on top of the soil.

13. Visibly contaminated soil or soil suspected of being contaminated shall be removed down to the level where no visible contamination is observed.

14. The Project Monitor shall write in the project log that the area has been cleaned and has passed a visual inspection.

Preparation of Waste Transfer Equipment:

15. Dumpsters/trailers used to haul non-friable ACM materials do not need to be doubled lined as required by ICR 56-11.5 (c) (11).

16. Such trailers must be made air, dust and water tight prior to leaving the site.

17. RACM must be transported in double lined trailers as required by ICR 56-11.5 (c) (11).

Final Clearance:

18. After removal and cleanings are complete an authorized and qualified Project Monitor shall visually inspect the work area as per ICR 56-9.2 (e). If the area is determined to be acceptable and the most recent daily abatement air sample (including perimeter air samples) results meet 56-4.11 clearance criteria, the final dismantling of the site may begin. All other applicable provisions of ICR 56-4 shall be followed for the duration of the abatement project.

19. Usage of this variance is limited to those asbestos removals identified in this variance or as outlined in the Petitioner's proposal.

In addition to the conditions required by the above specific variances, the Petitioner shall also comply with the following general conditions:

GENERAL CONDITIONS

1. A copy of this DECISION and the Petitioner's proposals shall be conspicuously displayed at the entrance to the personal decontamination enclosure.

2. This DECISION shall apply only to the removal of asbestos-containing materials from the aforementioned areas of the subject premises.

3. The Petitioner shall comply with all other applicable provisions of Industrial Code Rule 56-1 through 56-12.

4. The NYS Department of Labor Engineering Service Unit retains full authority to interpret this variance for compliance herewith and for compliance with Labor Law Article 30. Any deviation to the conditions leading to this

variance shall render this variance Null and Void pursuant to 12NYCRR 56-12.2. Any questions regarding the conditions supporting the need for this variance and/or regarding compliance hereto must be directed to the Engineering Services Unit for clarification.

5. This DECISION shall terminate on November 30, 2022.

Date: November 15, 2021

ROBERTA L. REARDON
COMMISSIONER OF LABOR

By Edward A Smith

Edward A. Smith, P.E.
Professional Engineer 2 (Industrial)

PREPARED BY: Edward A. Smith, P.E.
Professional Engineer 2 (Industrial)

REVIEWED BY: Ravi Pilar P.E.
Professional Engineer 1 (Industrial)

New York State Department of Labor
Division of Safety and Health - Engineering Services Unit
Building 12 , Room 159
State Office Campus
Albany, N.Y. 12240

Petition for an Asbestos Variance

To apply for an asbestos variance the Project Designer must:

- Complete all of the information on pages one and two of this asbestos variance request. Please type or print.
- Sign and date page two of the certification and all of the attachments.
- Send two copies of the petition and all attachments, with your $350 fee, to the address at the top of this page.
  - Make your check or money order payable to the Commissioner of Labor.
- Optional: To speed up the process you may include a self-addressed, stamped, express-mail envelope.

1a. **Is this petition related to a safety or health emergency?** x Yes _____No
b. If yes, explain: see attached

2a. **Name of Petitioner,** (Property Owner): US EPA Region 2
b. Street Address: 2890 Woodbridge Avenue
c. City: Edison d. State: NJ e. Zip: 08837
f. Telephone Number: ( ) - g. Fax Number: ( ) -
h. Petitioner's Federal Employee Identification Number (FEIN) _____

3a. **Petitioner's Agent (Asbestos Contractor) Firm Name**: Paradigm Environmental, LLC.
b. Street Address: 3 Neptune Road - Suite A-18E
c. City: Poughkeepsie d. State: NY e. Zip: 12601
f. Telephone Number: ( ) - g. Fax Number: ( ) -

4a. Asbestos Contractor License No. 130569 b. Name of Firm: Paradigm Environmental, LLC.

5. **Building Description**:
a. Affecting premises known as: Ricketts Dry Cleaners Building
b. These premises are situated on the ____North, ____South, ____East, ____West side of _____Street, ____Ave, ____Road.
c. County of Saratoga
d. Street Address: County Route 50
e. City Ballston Spa f. State: NY g. Zip 10708
h. Is building occupied? _____Yes X____No
i. Current function of building: Abandonded Commercial
j. Approximate area (square feet) of building: NA k. Number of stories or height in feet: _____
l. What is within 25 feet of all four sides (North, South, East, West) of building? i.e. sidewalk, alley, land, another building, etc.: Commercial buildings, sidewalks

6. **Order To Comply or Notice of Violation**. Attach copy.
a. Issued to: _____Owner _____Asbestos Contractor _____Operator _____Other
b. Name on Order or Notice: _____ c. Date issued: ____/____/____
d. List the Industrial Code Rule (ICR) citations given on the Order to Comply or Notice of Violation: _____

7. If a variance has been granted previously for work closely resembling this project list:
a. Variance number: _____ b. Date variance granted: ____/____/____

Note: Add a separate typed or printed page for each work area and work procedure. Sign and date each page.

8. **Work Area Description Table**: Attach additional tables and scale drawings of work area and pictures, as needed.

Work Area Designation	Exterior or Interior	Work/Room Area Dimensions	Type of Asbestos Containing Material (ACM)	Quantity of ACM	Condition of ACM (level of damage)	Friability of ACM (non-friable or friable)	Type of Containment (full, 2-layer tent, single layer tent, open-air, etc.)
Whole Building	Exterior	-	Whole Building	> 160 ft2	Significantley Damaged	Friable & Non-Friable	Controlled Demolition

9. **ICR 56 Relief Sought:** List the individual sections of ICR 56 for which relief is sought, for each work area or method used. Provide sufficient detail in an attachment. see attached

10. **Hardship Description:** What is the hardship, (e.g. Limited room for decons, exhaust ducts must be longer than 25 feet, all surfaces are contaminated and cannot be plasticized) for each work area or method used? Provide sufficient detail in an attachment. Include condemnation letter or EPA Approval letter if applicable. see attached

11. **Proposed Abatement Method Description for each work area or method used.** Include scale drawings and pictures as necessary. Lack of sufficient detail will delay issuance of variance decision.
    a. Will proposed abatement methods render non-friable ACM material friable? _____ Yes _____No
    b. What proposed abatement method, increased engineering controls and detailed procedures will be used to compensate for the relief being sought? (i.e. Increased negative air rate, negative pressure glovebag, negative pressure glovebox, high temperature glovebag, intact component removal, etc.) Include sufficiently detailed procedures to complete the proposed work. see attached

Project Designer Certification

I request that the Commissioner of Labor issue a variance from the requirements of Industrial Code Rule (ICR) 56. This request is based on the information in this application and the attached documents.

I certify that the information contained in this petition is true and accurate.

I understand that if a variance is granted it may be withdrawn by the Commissioner:

- if any of the information provided in this petition is found to be inaccurate or
- if there are violations of Article 30 of the New York State Labor Law or New York State regulations.

I give the Commissioner of Labor permission to provide all of my companies records for Unemployment Insurance (U.I.) reports and contributions to employees of the New York State Department of Labor. This includes information about withholding, wage reporting, U.I. returns, U.I.registration, New Hires, and all records of U.I. delinquencies. This information may only be used for government purposes regarding the licensing and certification of this company as required by Article 30 of the New York State Labor Law and the regulations of the New York State Department of Labor, and for monitoring the company's compliance with Article 30 and ICR 56.

12 a. Project designer name (print): Jack Kunicki

b. Project Design Asbestos Contractor firm name: Paradigm Environmental, LLC.

c. Street: 3 Neptune Road - Suite A-18E

d. City: Poughkeepsie e. State: NY f. Zip: 12601 g. Phone: ( ) -

h. Designer certificate number: AH94.06821 i. Expiration Date: 11 / 30 / 2021

j. Design Firm Asbestos Contractor License Number 130569 k. Expiration Date: 04 / 30 / 2022

13 a. Project designer signature: Jack Kunicki b. Date: 10 / 04 / 2021

State of New York - Department of Labor
Division of Safety and Health
Engineering Services Unit
State Office Building Campus
Albany, New York 12240

Monday, October 4th, 2021

Dear Commissioner:

Paradigm Environmental, LLC. (**PARADIGM**), acting on behalf of and as an agent for Precision Environmental Services, Inc. is requesting a variance from the requirements of the Labor Law. I have enclosed in this packet: a typed application (NYS DOH-752), a check payable to the Commissioner of Labor for $350.00, and a detailed explanation of the grounds for this variance and means for securing the public safety and health with regard to this variance. Commencement of the work is dependent upon approval of this variance request.

PARADIGM completed a Visual Asbestos and Condition Assessment of the former Ricketts Dry Cleaners Building in Ballston Spa, New York on Thursday, January 21st, 2021. The condition of the building varied from section to section. Based on the observed conditions in the building sections, **PARADIGM** returned to the site on Wednesday, February 24th, 2021, to perform a complete Pre-Demolition Asbestos Survey. of the former Car Wash Building and a Limited (Friable-only) Pre-Demolition Survey Inspection of two (2) sections of the former Dry Cleaners Building. The attached aerial photo of the subject building provides an illustration of the sections of the building.

Former Car Wash Building

1. No asbestos containing materials (ACM) were identified in the Former Car Wash Building. The demolition of the building can be completed, and waste can be handled, without further asbestos restrictions.

Ricketts Dry Cleaner Building

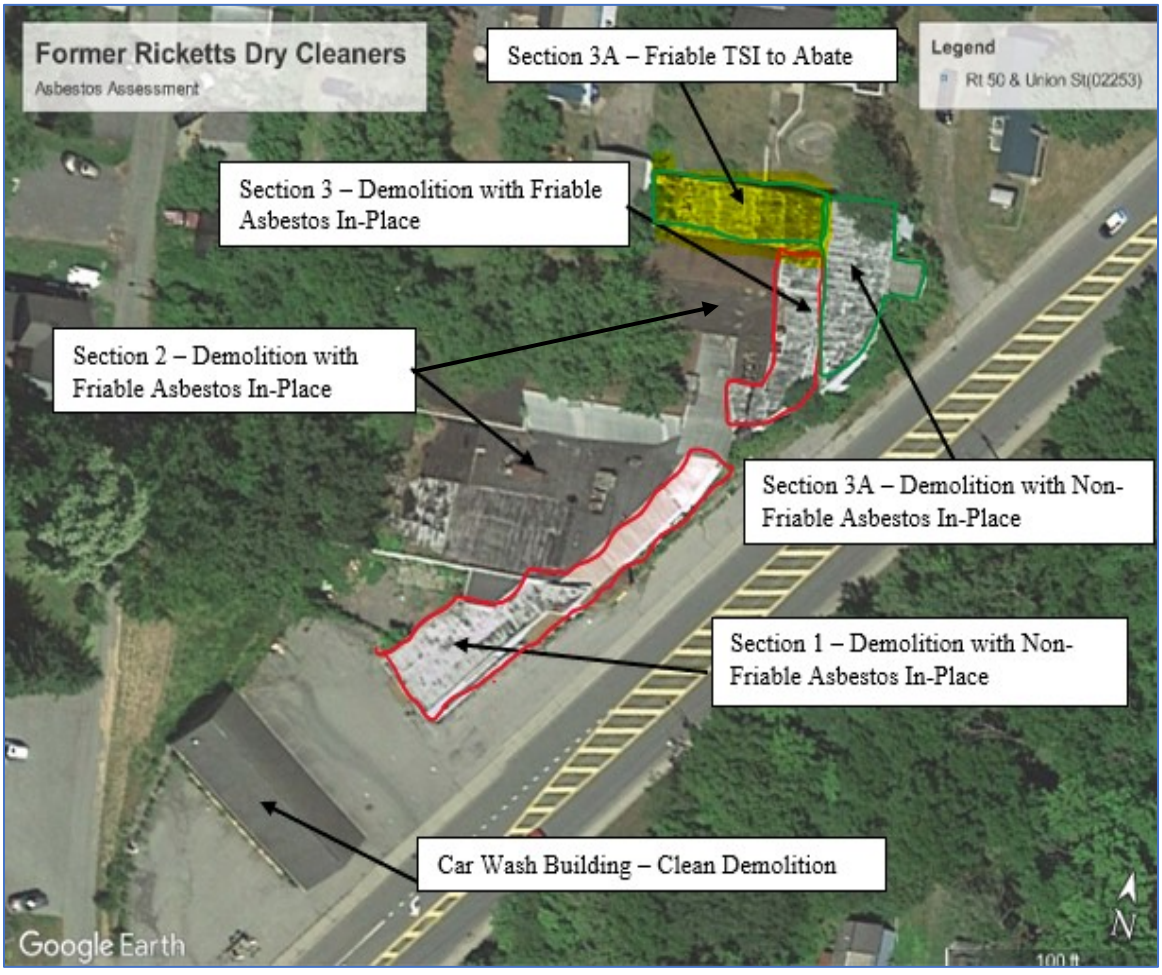
1. The silver roof coating on Building Sections 1 & 3 was found to be ACM. For potential cost savings, Section 3 can now be divided into two (2) subsections (Subsections 3 and 3A). Additional friable Thermal System Insulation (TSI) was discovered above the ceiling in Section 3 and cannot safely be removed.

2. **Section 1** should be demolished as a Non-Friable asbestos abatement project.

3. **Section 2** must be demolished as a Friable asbestos abatement project.

4. **Section 3** must be demolished as a Friable asbestos abatement project.

5. **Section 3A** contains friable asbestos which can be abated prior to demolition. Following the abatement of the friable asbestos, the building should be demolished as a Non-Friable asbestos abatement project. The TSI is located along the North side of the building section wall.



PARADIGM ENVIRONMENTAL, LLC.

Summary Table

Section	Proposed Action
Former Car Wash Building	Clean Demolition
Former Dry Cleaners Building – Sections 1	Controlled Demolition with Non- Friable Asbestos In-Place
Former Dry Cleaners Building – Section 2	Controlled Demolition with Friable Asbestos in Place
Former Dry Cleaners Building – Section 3	Controlled Demolition with Friable Asbestos in Place
Former Dry Cleaners Building – Section 3A	Friable abatement and Controlled Demolition with Non-Friable Asbestos In-Place

Notification to the Department of Labor for asbestos removal will be submitted by the appropriate asbestos abatement contractor contracted to perform the work in the specified area. If the amount of asbestos to be removed is expected to exceed that specified herein, the Department of Labor will be notified immediately.

In order to protect the safety and health of building occupants and to allow for the asbestos abatement to be performed in a safe and timely manner, on behalf of **Precision Environmental Services, Inc., PARADIGM** is requesting that the following work practices be followed:

Proposed alternatives to ensure the safety of the public and of those associated with the project.

ICR 56 Relief Sought

1. **ICR 56-4.9(a) Background Air Sampling:** Due to the nature of the work no background air sampling shall be required.

2. **ICR 56-4.9(d) Final Clearance Air Sampling:** Due to the nature of the work the final set of daily air samples shall be used for clearance.

3. **ICR 56-5.1 (c):** The certified asbestos inspector shall determine whether they have required access to perform an asbestos survey.

4. **ICR 56-11.5(c)(2): Regulated Abatement Work Area:** Adjacent roads or existing buildings which exist within twenty-five (25) feet of the building may not be plasticized.

5. **ICR 56-11.5(c)(7): Debris:** Non-suspect material such as brick, block, concrete or stone to be segregated, cleaned and treated as non-ACM. Non-friable organically bound materials may be disposed of as non-RACM (construction and demolition debris).

6. **ICR 56-11.5 (c) (11):** Relief from lining the dumpster with two (2) layers of fire-retardant six (6) mil plastic sheeting, since disposal consists of only non-friable organically bound asbestos materials which are not regulated for disposal by the USEPA or NYSDEC as asbestos containing materials.

Hardship Description

7. The intention of the survey was to determine if Regulated Asbestos Containing Material (RACM) exists within the building. If no RACM exists in the building or if the identified RACM is located in a portion of the building which is structurally sound and is removed prior to demolition, there is no advantage to disposing of the entire building as RACM. Buildings which either have been determined to have no RACM or from which all RACM has been removed can appropriately be disposed of as non-friable asbestos C&D in accordance with 6 NYCRR 360.

8. Work practices for demolition of buildings with RACM and buildings with non-friable asbestos, but no RACM are identical.

9. Since the work practices, transport and disposal are essentially unchanged, there is no benefit to health and safety when a building is determined to not contain RACM. The only difference is the disposal.

10. Allowing the certified asbestos inspector to determine and document if an asbestos survey may physically be performed allows buildings scheduled for demolition to be appropriately demolished in accordance with the regulations without squandering resources on needlessly disposing of non-RACM as RACM.

11. Demolition can be performed in such a way to allow segregation and cleaning of materials such as brick, block, concrete, stone, etc. to allow such materials to be appropriately treated as non-ACM.

12. It is inappropriate and wasteful of our limited landfill space to fill it up with non-suspect "hard fill" materials, when there is a means to segregate and clean these materials for use for fill.

PARADIGM ENVIRONMENTAL, LLC.

13. **PARADIGM** believes that segregating and cleaning the non-suspect materials would not violate the spirit of ICR 56, adequately protect human health and the environment, and to help preserve our nation's limited landfill space.

14. **PARADIGM** believes that the alternative work methods requested herein provide equivalent protection to human health and the environment and meet the spirit of ICR 56.

Proposal - Wet Methods

15. ACM shall be removed in as large as possible sections and using methods to minimize asbestos disturbance.

16. During these periods, the temperature in the area shall be recorded at the beginning, middle and end of the workday and the daily temperature recorded and available for inspection.

17. Temperature records shall be retained for at least two (2) years.

18. All required air monitoring/ sampling still applies.

19. Decontamination of non-porous salvageable materials must be performed using wet methods.

Proposal - Abatement/ Demolition

20. The notification for any demolition performed as an abatement project due to the building being condemned, shall include a copy of the condemnation letter from the official of competent jurisdiction attached to the project notification mailed to the Department of Labor and a copy of the condemnation letter shall be posted at the work site as per ICR 56-11.5(b)(l).

21. A full-time project monitor shall be on site to monitor asbestos abatement contractor work methods whenever the asbestos abatement contractor is performing abatement work.

22. Demolition of the structure shall occur in accordance with ICR 56-11.5 as modified herein.

PARADIGM ENVIRONMENTAL, LLC.

23. The entire controlled demolition area of the work site shall be considered the regulated abatement work area and shall be enclosed within a barrier or fence that defines the regulated areas. The active demolition areas, cleanup areas, decontamination system enclosures/areas, staging areas and waste dumpster/trailer areas shall be cordoned off at a distance of twenty five (25) feet, except where physical restrictions limit the barrier distance (e.g. property boundary, roadway, or other right-of way, neighboring building/structure, etc.) and the regulated abatement work area shall remain vacated except for certified workers until satisfactory clearance air monitoring have been achieved or the abatement work is complete. The intent of this barrier/fence is to define the regulated area at the work site, alert the public to the asbestos work and associated hazards, and to prevent unauthorized entry onto the work site. Four-foot high orange construction fence or snow fence is acceptable for the barrier.

24. If the owner of an adjacent building within twenty five (25) feet of the outermost limit of the disturbance area does not allow openings to be sealed as required, the asbestos abatement contractor's supervisor shall document the issue within the project log and have the affected building owner sign the log confirming that the owner will not allow the asbestos abatement contractor to seal the openings in the building as required. In addition, a daily abatement air sample shall be included outdoors within ten feet of the affected portion of the adjacent building.

25. When active abatement work, including building demolition, sorting the debris, and loading the containers or trucks for removal is occurring, air sampling shall be performed as per ICR 56-11.5(a).

26. Suspect non-friable materials, such as wood roof deck, wood roof structure and roofing materials will be mechanically or manually sorted and shall be disposed of by appropriate legal means as non-friable asbestos construction & demolition debris.

27. Non-suspect non-porous materials such as wood structural members, brick, block, concrete, stone, etc. may be mechanically or manually sorted and cleaned. Upon passing a project monitor inspection they may be disposed of by appropriate legal means and used on site or transported off site for use as "hard fill" or C&D.

28. Non-suspect materials such as steel may be mechanically or manually sorted and cleaned. Upon passing a project monitor inspection they shall be disposed of by appropriate legal means, such as recycling.

29. The separated suspect non-friable materials and non-suspect materials will be washed off with water to clean residual suspect materials from the non-suspect materials. Wash water will be controlled as per ICR 56-11.5 (c) (10).

PARADIGM ENVIRONMENTAL, LLC.

30. Material containing non-friable asbestos containing material shall be disposed of by appropriate legal means as non-friable asbestos containing C&D.

31. Non-suspect materials that have been segregated, cleaned, inspected by the project monitor and determined to be free from suspect materials shall be treated as non-asbestos material and removed from the site for disposal by appropriate legal means.

32. In lieu of full compliance with section ICR 56-11.5(c)(11), the waste transport container, dumpster or trailer, shall be sealed watertight while used for temporary storage of waste at the work site, and must be secure (no uncertified individuals are allowed access to the waste). The waste container, dumpster or trailer must also be suitable for containing the generated ACM waste (Leakage or spillage of the waste from the container while temporarily stored on-site is prohibited). Unsealed holes within the waste container, dumpster or trailer are not acceptable during temporary storage of waste at the work site.

33. **Relief requested ICR 56-9.2(d):** In lieu of post-abatement clearance air monitoring in compliance with ICR56-9.2(d), the most recent daily abatement air samples collected during removal and cleaning operations in the regulated work area, shall be used for comparison with ICR 56-4.11 clearance criteria.

If you have any questions or need any additional information, please do not hesitate to contact me at 845.462.1466. Thank you for your prompt attention to this matter.

Submitted by:

Jack Kunicki

Jack Kunicki
Paradigm Environmental, LLC.

APPENDIX D
Monitoring Equipment Specifications

PINE
Partner for Test & Measurement Equipment Services and Data Solutions

Photo Ionization Detectors (PIDs)
Air / Gas Monitoring

SEE VIDEO: https://youtu.be/hts0vwOJlAk

HONEYWELL

MiniRAE 3000 PID

Portable Handheld VOC Monitor

Pine Item #51238

DESCRIPTION:

The MiniRAE 3000 PID is the most advanced handheld volatile organic compound (VOC) detector on the market. Its Photoionization Detector (PID) extended range of 0 to 15,000 ppm makes it an ideal instrument for applications from industrial hygiene, to leak and hazmat detection.

The RF modem allows real-time data transmissions with a base controller located up to 500 feet (or two-miles with optional RAELink2 portable modem) away from the MiniRAE 3000 detector.

A personal computer can be used as the base station for a Mini-RAE 3000 system. The standard ProRAE Remote software is capable of monitoring the input of up to 64 remotely-located monitors like MiniRAE 3000, or AreaRAE, etc.

FEATURES:

- Rugged construction for use in harsh environments
- Easy-to-use PID with 10.6 eV lamp as standard
- Easy access to lamp and sensor in seconds without tools.
- Inbuilt full RAE Systems 350 compounds correction factors list measure more chemicals than any other PID
- Real-time wireless data transmission with built-in RF modem or Bluetooth
- Other lamps (9.8 and 11.7 eV) available on request
- Measures a wide range of VOCs
- Long battery life for extended sampling

APPLICATIONS:

- Oil and Gas
- Environmental Cleanups and Remediation
- Leak Detection
- Hazmat & Emergency Reponse
- Worker Exposure
- Venue Protection
- Perimeter Monitoring

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Canada
www.pine-environmental.ca

Product Specifications

Sensors	Photoionization sensor with standard 10.6 eV or optional 9.8 eV or 11.7 eV lamps
Battery	Rechargeable external field-replaceable Lithium-Ion battery pack Alkaline battery adapter
Display Graphic	4 lines 28 x 43 mm with LED backlight for enhanced display readability
Calibration	Two-point or three-point calibration for zero and span. Calibration memory for 8 calibration gases alarm limits span values and calibratio
Datalogging	Standard 6 months at one-minute intervals
Sampling Pump	Internal integrated flow rate at 500 cc/mn Sample from 100' (30m) horizontally and vertically
Frequency	902 to 928 MHz (license-free) 2.400 to 2.4835 GHz (license-free) 433 MHz 869 MHz
RF Range	Up to 500' (900 MHz 433 Mhz 869 Mhz) extendable with RAELink3 Repeater to 2 miles
Humidity	0% to 95% relative humidity (non-condensing)
Temperature	-4° to 113° F (-20° to 50° C)
Dimensions	US: 10 x 3" x 2.5 " Metric: 25.5 x 7.6 x 6.4 cm
Weight	US: 26 oz Metric: 738 g
Weight	55 lbs. | 25kg

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SEE VIDEO:
https://youtu.be/hts0vwOJlAk

Local Delivery & Pick-up

In-Stock Equipment

Repair & Calibration

HEALTH AND SAFETY

Exposure Monitoring

Features and Benefits

- Easy to program, easy to operate
- New graphical user interface with color touch-screen
- Perform in-line gravimetric analysis for custom reference calibrations
- Automatic zeroing (with optional zero module) minimizes the effect of zero drift
- Measure aerosol concentrations corresponding to PM_1, $PM_{2.5}$, PM_{10}, or Respirable size fractions

DustTrak™ II Aerosol Monitor

Models 8530, 8531, and 8532

Desktop or Handheld Units for Any Environment, Any Application

The new DustTrak II Aerosol Monitors are battery-operated, data-logging, light-scattering laser photometers that give you real-time aerosol mass readings. They use a sheath air system that isolates the aerosol in the optics chamber to keep the optics clean for improved reliability and low maintenance. Suitable for clean office settings as well as harsh industrial workplaces, construction and environmental sites and other outdoor applications. DustTrak II monitors measure aerosol contaminants such as dust, smoke, fumes and mists.

Applications

- Industrial/occupational hygiene surveys
- Indoor air quality investigations
- Outdoor environmental monitoring
- Baseline trending and screening
- Point source monitoring
- Engineering control evaluations
- Engineering studies
- Remote monitoring
- Process monitoring
- Emissions monitoring
- Aerosol research studies

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Easy to Program and Operate

The new graphical user interface with color touch-screen puts everything at your fingertips. The easy-to-read display shows real-time mass concentration and graphical data as well as other statistical information along with instrument pump, laser and flow status, and much more. Perform quick walk-through surveys or program the instrument's advanced logging modes for long-term sampling investigations. Program start times, total sampling times, logging intervals, alarm setpoints and many other parameters. You can even set up the instrument for continuous unattended operation.

Desktop Models: Ideal for Long-Term Surveys and Remote Monitoring Applications

Manual and programmable data logging functions also make DustTrak II desktop monitors ideal for unattended applications. They come with USB (device and host), Ethernet, and analog and alarm outputs allowing remote access to data. User adjustable alarm setpoints for instantaneous or 15-minute short-term excursion limit (STEL) are available on desktop models. The alarm output with user-defined setpoint alerts you when upset or changing conditions occur.

All DustTrak II desktop monitors have three unique features:

- Gravimetric sampling capability using a 37-mm filter cassette which can be inserted in-line with the aerosol stream allowing you to perform an integral gravimetric analysis for custom reference calibrations.
- They can be zeroed automatically using the external zeroing module. This optional accessory is used when sampling over extended periods of time. By zeroing the monitor during sampling, the effect of zero drift is minimized.
- STEL alarm feature for tracking 15-minute average mass concentrations when alarm setpoint has been reached for applications like monitoring fugitive emissions at hazardous waste sites.

Handheld Models: Perfect for Walk-Through Surveys and Single-Point Data Collection Applications

DustTrak II handheld models are lightweight and portable. They're perfect for industrial hygiene surveys, point source location monitoring, indoor air quality investigations, engineering control evaluations/validation, and for baseline trending and screening. Like desktop models, they have manual and programmable data logging functions. In addition, they have single-point data logging capability. Single-point data collection is used for walk-through industrial hygiene surveys and indoor air quality investigations.

New Software Makes Monitoring Easier than Ever

TrakPro™ Data Analysis Software allows you to set up and program directly from a PC. A new feature is the ability for remote programming and data acquisition from your PC via wireless (922 MHz or 2.4 GHz) communications or over an Ethernet network. As always, you can print graphs, raw data tables, and statistical and comprehensive reports for recordkeeping purposes.

DustTrak II Aerosol Monitor Features

All Models

- Li-Ion rechargeable batteries
- Internal and external battery charging capabilities
- Outlet port for isokinetic sampling applications
- User serviceable sheath flow and pump filters
- Logged test pause and restart feature
- Logged test programming
  - – Color touch screen—either manual mode or program mode
  - – TrakPro™ Data Analysis Software via a PC
- User adjustable custom calibration settings
- Instantaneous alarm settings with visual and audible warnings
- Real-time graph display
- View statistical information during and after sampling
- On-screen instrument status indicators: FLOW, LASER and FILTER
- Filter service indicator for user preventative maintenance

All Desktop Models

- Hot swappable batteries
- Gravimetric reference sample capability
- Long life 10,000-hour internal pump
- TrakPro Data Analysis Software
- Auto zeroing module (optional accessory)
- STEL alarm setpoint

All Handheld Models

- Long life 2,500-hour internal pump
- Single-point data collection for walk through surveys
- TrakPro Data Analysis Software

Battery Performance

Models 8530/8531 (typical) 6600 mAH Li-Ion Battery Pack (P/N 801680)	1 Battery	2 Batteries
Battery Runtime (hours)	up to 6	up to 12
Charge Time * (hours) in DustTrak	4	8
Charge Time* (hours) in external battery charger (P/N 801685)	4	8

Model 8532 (typical) 3600 mAH Li-Ion Battery Pack (P/N 801681)	Battery
Battery Runtime (hours)	up to 6
Charge Time * (hours) in DustTrak	4
Charge Time* (hours) in external battery charger (P/N 801686)	4

*of a fully depleted battery

Specifications

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DustTrak™ II Aerosol Monitor

Sensor Type
90° light scattering

Particle Size Range
0.1 to 10 µm

Aerosol Concentration Range

8530 Desktop	0.001 to 150 mg/m^3
8531 Desktop High Conc.	0.001 to 400 mg/m^3
8532 Handheld	0.001 to 150 mg/m^3

Resolution
±0.1% of reading or 0.001 mg/m^3, whichever is greater

Zero Stability
±0.002 mg/m^3 per 24 hours at 10 sec time constant

Flow Rate
3.0 L/min set at factory, 1.40 to 3.0 L/min, user adjustable

Flow Accuracy
±5% of factory set point, internal flow controlled

Temperature Coefficient
+0.001 mg/m^3 per °C

Operational Temp
32 to 120°F (0 to 50°C)

Storage Temp
-4 to 140°F (-20 to 60°C)

Operational Humidity
0 to 95% RH, non-condensing

Time Constant
User adjustable, 1 to 60 seconds

Data Logging
5 MB of on-board memory (>60,000 data points)
45 days at 1 minute logging interval

Log Interval
User adjustable, 1 second to 1 hour

Physical Size (HWD)

Handheld	4.9 x 4.8 x 12.5 in. (12.5 x 12.1 x 31.6 cm)
Desktop	5.3 x 8.5 x 8.8 in. (13.5 x 21.6 x 22.4 cm)

Weight

Handheld	2.9 lb (1.3 kg), 3.3 lb (1.5 kg) with battery
Desktop	3.5 lb (1.6 kg), 4.5 lb (2.0 kg)–1 battery, 5.5 lb (2.5 kg)–2 batteries

Communications

8530/31	USB (host and device) and Ethernet. Stored data accessible using flash memory drive
8532	USB (Hose and device). Stored data accessible using flash memory drive

Power–AC
Switching AC power adapter with universal line cord included, 115–240 VAC

Analog Out

8530/31	User selectable output, 0 to 5 V or 4 to 20 mA User selectable scaling range

Alarm Out

8530/31	Relay or audible buzzer Relay Non-latching MOSFET switch User selectable set point –5% deadband Connector 4-pin, Mini-DIN connectors
8532	Audible buzzer

Screen

8530/31	5.7 in. VGA color touchscreen
8532	3.5 in. VGA color touchscreen

Gravimetric Sampling

8530/31	Removable 37 mm cartridge (user supplied)

CE Rating

Immunity	EN61236-1:2006
Emissions	EN61236-1:2006

Specifications are subject to change without notice. TSI, the TSI logo, DustTrak, and TrakPro are trademarks of TSI Incorporated. Microsoft and Windows are trademarks of Microsoft Corporation.

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