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September 16, 2019

Ms. Jess LaClair
New York State Department of Environmental Conservation
Division of Environmental Remediation/Remedial Bureau D
625 Broadway, 12th Floor
Albany, New York 12233-7013

Subject: **Response to Comments – August 26, 2019 NYSDEC Correspondence**
Community Air Monitoring Plan – Demolition of Existing Buildings (Revised July 2019)
General Electric Company - Fort Edward, New York
Site No. 5-58-004; Consent Index No. D5-0001-2000-03

Dear Jess:

GE has reviewed the NYSDEC's August 26, 2019 letter providing comments from the NYSDEC and NYSDOH (the Departments) related to the revised (July 2019) "Community Air Monitoring Plan – Demolition of Existing Buildings" (CAMP) for the Fort Edward, New York site (Site). GE has prepared a revised CAMP (attached) that addresses the Departments' comments; a summary of our response to each comment is provided below.

Comment 1: *While the Departments understand why GE would like to use 0.260 µg/m3 as a commercial action level for PCBs in air, this value is not protective of public health for all surrounding receptors. The Departments will recognize 0.110 µg/m3 at the site perimeter to be protective of public health for all receptors for this project. The Departments also recognize 0.08 µg/m3 as the control level which will prompt notification and discussion of the results, leading to potential application of best management practices or other mitigations to address the conditions. Please remove all references to a commercial receptor action level of 0.260 µg/m3 from the revised CAMP.*

GE Response – GE has revised the CAMP to remove specific references to the commercial-use Action Level of 0.260 µg/m3.

Comment 2: *Please clarify what is considered interior and exterior work. Interior work will not include removal of any structural walls, the wood block floor, or TSCA material.*

GE Response – Interior work includes those activities that are performed at a time when the building's exterior walls and roof structure are intact; during these activities there is limited potential for ambient air impacts at the perimeter of the Site. The CAMP identifies the removal/relocation of remaining asbestos-containing materials, universal wastes, loose paint, and miscellaneous equipment as typical pre-demolition interior activities. The revised CAMP indicates that ambient air monitoring will be performed if interior activities involve the removal of structural walls and wood block flooring, or the removal of materials that contain PCBs above 50 mg/kg from the interior of the buildings.

Comment 3: *It is the Departments' understanding that air samples will be collected from all monitoring stations (a total of six) daily. The Departments request that permanent monitoring stations are analyzed daily, regardless of the weather conditions. Additional stations will be*

analyzed if warranted, based on upwind or downwind conditions, location of certain work activities, or other conditions that may provide information necessary to evaluate the potential for exposure via PCBs in air.

- *If exterior work is being performed at only Building 40, analysis is required for VOCs and PM10 at monitoring stations FE-12, 14, 15 and 16 at a minimum.*
- *If exterior work is being performed at the Main Manufacturing Building, analysis is required for PCB, VOCs and PM10 at monitoring stations FE-12, 13, 14 and 17 at a minimum.*
- *If handling TSCA-material, indoors or outdoors, analysis is required for PCBs at monitoring stations FE-12, 13, 14 and 17 at a minimum.*

GE Response – The revised CAMP incorporates this comment.

Comment 4: *Section 5.4 PCB Sampling and Analysis – Pre-filter analysis is not required if working in non-TSCA areas. Pre-filter analysis is required when working in TSCA areas until the Departments have enough information to determine that an exposure pathway does not exist to PCBs released in airborne particulates and it is appropriate to discontinue the collection and analysis of the pre-filter sample.*

GE Response – Acknowledged. The revised CAMP removes the conditions that were proposed for the cessation of the pre-filter analysis (i.e., non-detect PCBs over a two-week timeframe); clarifies that the pre-filter sample will be analyzed if work activities involve the demolition, removal, or handling of materials that contain PCBs above 50 mg/kg; and reinforces that elimination of the pre-filter analyses will only occur with the Departments' concurrence.

Comment 5: *Section 5.5 Meteorological Monitoring – The meteorological monitoring system should be sited at least 10-meters above grade. Please use the most recent guideline established by EPA, Quality Assurance Handbook for Air Pollution Measurement Systems, Volume IV: Meteorological Measurements Version 2.0 (Final). EPA-454/B-08-002, March 2008. U.S. Environmental Protection Agency.*

GE Response – Acknowledged. GE anticipates that the location of the meteorological station will be positioned within the secure parking area located to the south of the main facility, as shown on the figures in the revised CAMP.

Please feel free to contact me at 518-429-4505 if you have any questions or comments.

Sincerely,

Laurie Scheuing

Laurie Scheuing
Project Manager

Enclosure

cc: Hard Copy:
C. Vooris – NYSDOH
A. Park – USEPA

Electronic Copies:
S. Edwards – NYSDEC
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M. Murphy – NYSDEC
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ARCADIS Design & Consultancy for natural and built assets

General Electric Company

COMMUNITY AIR MONITORING PLAN - DEMOLITION OF EXISTING BUILDINGS

Fort Edward Facility

381 Broadway

Fort Edward, New York

September 2019

COMMUNITY AIR MONITORING PLAN – DEMOLITION OF EXISTING BUILDINGS

Fort Edward Facility
381 Broadway
Fort Edward, New York

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September 2019

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1 INTRODUCTION AND OBJECTIVES

This Community Air Monitoring Plan (CAMP) describes the ambient air monitoring program that will be implemented during building demolition and related material management activities at General Electric Company's (GE's) Fort Edward facility located at 381 Broadway in Fort Edward, New York (the Site). Figure 1 shows the location of the Site.

The planned building demolition activities have been described in the *Self-Implementing Cleanup and Disposal Plan for PCB Remediation Waste – Building Demolition* (Demolition Work Plan), which was submitted to the New York State Department of Environmental Conservation (NYSDEC) and United States Environmental Protection Agency (USEPA) on February 28, 2019. The Demolition Work Plan was approved by USEPA on March 28, 2019 and conditionally-approved by the NYSDEC on June 13, 2019. The NYSDEC conditions were related to: 1) the post-demolition removal and management of certain at-grade slabs (addressed by GE in the submittal of a revised Demolition Work Plan in September 2019), and 2) submittal of responses to NYSDEC comments on the initial October 2018 CAMP. In July 2019, GE submitted a revised CAMP, and NYSDEC and New York State Department of Health (NYSDOH) comments were provided in a letter dated August 26, 2019. This revised CAMP incorporates the most recent Departments' comments.

As discussed in the Demolition Work Plan, the anticipated activities include the demolition of existing, above-grade structures/buildings; sizing, loading, handling of various waste debris; off-Site transportation and disposal of the debris; and surface restoration activities in areas disturbed by building demolition. Ambient air monitoring will be performed at several locations during the majority of these activities. Figure 2 shows the location of the on-Site buildings, nearby properties, and proposed ambient air monitoring locations.

This CAMP includes a description of the activities that will be performed to monitor the Site for the potential presence of project-related airborne constituents during the demolition project, and the response actions that will be taken if threshold concentrations of those constituents (i.e., polychlorinated biphenyls [PCBs], volatile organic compounds [VOCs], and particulate matter) are detected. A summary of the proposed air monitoring procedures, monitoring schedule, sampling and analysis rationale, action levels, response actions, and associated reporting are presented in subsequent sections of this CAMP.

This CAMP has been prepared in consultation with NYSDEC and the NYSDOH and considers: 1) relevant regulatory and technical guidance, 2) Site- and project-specific factors (e.g., physical Site features, building characterization data, anticipated contractor means and methods), and 3) experience gained from recent Equalization (EQ) Basin cleanout at the Site and building demolition and soil remediation activities at GE's nearby Hudson Falls, NY site. Following project initiation and implementation of the CAMP as outlined herein, certain program modifications may be warranted based on the actual monitoring data and/or other project considerations. In this situation, GE may identify and discuss potential CAMP modifications with the NYSDEC and NYSDOH.

The air monitoring program described herein has been prepared using the air quality limits specified in the NYSDOH *Generic Community Air Monitoring Plan* (Generic CAMP), revision 1 (June 2000), and the NYSDEC Technical and Administrative Guidance Memorandum-4031, *Fugitive Dust Suppression and Particulate Monitoring Program* (October 27, 1989), and other air monitoring programs previously performed by GE in New York.

2 SITE DESCRIPTION AND BUILDING DEMOLITION ACTIVITIES

The Site is located at 381 Broadway in Fort Edward, New York; approximately 800 feet east of the Hudson River between the Villages of Hudson Falls (to the north) and Fort Edward (to the south). The Site is approximately 32 acres in size and is bound by the Washington County Building to the north, Broadway/US Route 4 to the east, Park Avenue to the south, and Canadian Pacific Railroad and Lower Allen Street to the west.

The Site contains the Main Manufacturing Building (approximately 295,000 square feet [sf]), including Building Nos. 22, 23, 25, 26, 27, 29, 31, and 33), Building 40 (approximately 95,000 sf), the Wastewater Treatment Plant (WWTP) (West Vaco; approximately 4,500 sf), and several other outbuildings, including a guard house, guard shack, pump house (Building 24), and hazardous waste storage building (Building 30). The original buildings (Building Nos. 22 and 23, guard house, guard shack, pump house) were constructed in 1942 by the U.S. Government as an aircraft turret manufacturing plant. Between 1942 and 1946, GE leased the building from the government for the manufacture of selsyn motors. GE purchased the property in 1946 and began manufacturing small and large capacitors. New buildings and building additions were constructed at the Site through the mid-1970s, with the notable addition of Building 25 in 1959, Building 40 in 1961, and Buildings 26 and 27 in 1967.

Operations related to capacitor manufacturing at the Site have included aluminum rolling, tin plating, surface coating, vapor degreasing, capacitor recovery and salvage operations, polypropylene film manufacture, refining and blending of dielectric fluids, and quality control operations. Among the products used in various operations were PCBs, organic solvents, and kerosene. PCB use at the facility was discontinued in 1977; use of organic solvents and kerosene-based fluids was discontinued in 1995.

Manufacturing operations were discontinued in Spring 2016. Closure activities were then initiated by GE with a few administrative and operations staff remaining at the facility to provide business and building decommissioning support, and to periodically perform quality assurance/quality control (QA/QC) testing of electrical equipment. Limited electrical equipment testing was performed until late 2017. The only remaining personnel at the facility are security staff and operations and maintenance staff that operate the remedial systems and WWTP.

Building demolition activities are generally anticipated to include the following:

- Utility disconnections/re-routes that will not require significant subsurface intrusion.
- Removal of remaining asbestos-containing materials (ACMs), universal wastes, and/or regulated materials. Note that any air monitoring related to ACM abatement activities would be consistent with applicable federal and state regulations and is not a component of this CAMP.
- Controlled demolition of the above-grade portions of the Main Manufacturing Building, Building 40, and certain on-Site outbuildings (including non-structural building components such as piping, HVAC systems, outdoor tanks, the electrical high yard and electrical equipment).
- Sizing, handling, loading, and management of building debris for off-Site transportation and disposal, appropriately segregated by waste type (e.g., regulated under the Toxic Substances Control Act [TSCA] and/or the Resource Conservation and Recovery Act [RCRA], ACM) based on previous building material characterization sampling.

- Downsizing of building masonry material for on-Site re-use as backfill.
- Post-demolition, interim Site restoration, which is anticipated to involve backfill / grading of pits and uneven topography to promote positive drainage and stormwater management and installation of a surface cover over certain building slabs.

Further details pertaining to the demolition activities were provided in the Demolition Work Plan.

3 POTENTIAL AIR EMISSIONS RELATED TO BUILDING DEMOLITION ACTIVITIES

Several of the planned demolition activities have the potential to result in the presence of airborne PCBs, vapors, and particulates including, but not limited to, the following:

- Demolishing buildings/structures.
- Handling of building debris, including separating, sizing, temporary on-Site stockpiling, and loading.
- Temporary stockpiling and placing of backfill material.
- Project vehicular traffic.
- Site restoration activities.

4 POTENTIAL COMMUNITY RECEPTORS

The Site is bordered by public, residential, and commercial areas and properties. The nearest residential structures to the Site are:

- Lower Allen Street – west side: ≥100 feet to the northwest and west of Building 40
- Lower Allen Street - west side: ≥250 feet to the west and southwest
- Park Avenue - south side: ≥350 feet to the south
- Broadway – east side: ≥250 feet to the east

The nearest commercial property is the Washington County Building, located approximately 50 feet to the north of the Site. Additional commercial properties are located near the Site buildings. On Sullivan Parkway, the Sullivan Technical Park and a multi-tenant commercial building are located approximately 450 feet to the south and southwest. Several commercial properties are located approximately 250 feet to the east along Broadway.

5 AIR MONITORING ACTIVITIES AND PROCEDURES

Ambient air monitoring will be performed during building demolition, material load-out, and other potential dust- or emission-generating activities. The general scope of monitoring activities is summarized below:

- Monitoring will be performed at several locations around the perimeter of the work area(s).
- Real-time air monitoring will be performed for VOCs and airborne particulates less than 10 microns in diameter (PM_{10}).

- Sampling for airborne PCBs will be performed daily during the demolition of the exterior Main Manufacturing Building and outbuildings.
- Based on the minimal PCB impacts in Building 40 materials of construction, and dust control measures to be implemented, there is little likelihood for the airborne presence of PCBs. Therefore, ambient air monitoring during Building 40 demolition will be performed for VOCs and airborne particulates but not PCBs.
- Ambient air monitoring will not be performed during pre-demolition activities that occur within the building interior areas (e.g., asbestos abatement, universal waste removal, non-structural material removal, loose paint removal). However, per NYSDEC, ambient air monitoring will be required when interior activities include removal of structural walls and wood block flooring, or the removal of materials that contain PCBs above 50 mg/kg from the interior of the buildings.

The initial sampling location rationale and sampling methods are discussed below. Throughout the project, GE will routinely communicate with the NYSDEC and NYSDOH regarding project status and monitoring results, and adjustments to the scope of the monitoring may be warranted based on these communications. Any potential modifications will be agreed upon by GE, NYSDEC, and NYSDOH, and documented in either a formal letter and/or the Monthly Progress Report for the project.

5.1 Monitoring Equipment and Calibration

Monitoring for VOCs, PM_{10}, and PCBs will be performed utilizing the following portable equipment (or equivalent):

- VOCs – RAE MiniRAE 2000 photoionization detector (PID) fitted with a 10.6 eV lamp, with operating/recording software.
- PM_{10} – TSI 8530 DustTrak, ThermoFisher ADR-1500, or similar real-time aerosol monitor, fitted with a 10.0-micron inlet nozzle, with operating/recording software.
- Ambient air PCBs – Low volume sampling pump, sampling cartridge, granular sorbet media filter (quartz-fiber pre-filter), and polyurethane foam (PUF) cylinders.
- Environmental enclosure with audible and visual alarms for PM_{10} and VOC monitors (tripod mounted).
- Meteorological station (Lufft WS 500 or equivalent) with operating/recording software to measure, at a minimum, wind speed, wind direction, relative humidity, rainfall, and ambient temperature.
- Wireless communications to phones and/or radios for VOCs and PM_{10} alarms.

Calibration of the instrumentation will occur at least daily, in accordance with each of the equipment manufacturer's requirements and recommendations (e.g., manufacturer's calibration, quality assurance requirements) and will be recorded in the field activity logbook. Flow rate measurements of the PCB sample pump will be performed before and after each 24-hour sampling event using a DryCal gas flow calibrator. Measures to protect the field equipment during periods of heavy precipitation will be implemented.

5.2 Monitoring Location Selection and Deployment

Figure 2 identifies the approximate locations of the ambient air monitoring locations and their position around the perimeter of the Site. GE will be prepared to conduct daily monitoring and sampling at each of

these locations. Depending on specific project circumstances (discussed below), some or all of these locations will be subject to real-time measurement of airborne particulates and vapors and/or sample collection for subsequent PCB laboratory analysis.

The scope of real-time monitoring for airborne particulates and vapors --- and sample collection for possible PCB laboratory analysis --- will proceed as described below:

- ***Interior Project Activities –*** Other than worker monitoring for health and safety purposes, ambient air monitoring for PCBs, vapors, or particulates will not be performed during pre-demolition activities that occur within the building interior areas (e.g., asbestos abatement, universal waste removal, non-structural material removal, loose and flaking paint removal). As discussed above, ambient air monitoring will be performed during removal of interior structural walls and wood block flooring, or the removal of materials that contain PCBs above 50 mg/kg from the interior of the buildings.
- ***Building 40 Demolition –***
    - PCB air sampling will not be performed during demolition of Building 40 (or subsequent material management activities).
    - At a minimum, VOC and PM_{10} monitoring will be performed at monitoring stations 12, 14, 15, and 16 as shown on Figure 2.
- ***Main Manufacturing Building and Outbuilding Demolition –***
    - At a minimum, VOC and PM_{10} monitoring, and daily PCB sample analysis will be performed at monitoring stations 12, 13, 14, and 17 (Figure 2). Additional discussion regarding PCB sample analyses is provided in Section 5.4 below.

5.3 VOC and PM_{10} Particulates Monitoring

For airborne particulates and vapors, designated upwind and downwind monitoring locations will be determined daily considering forecasted weather conditions, data from the on-Site meteorological station, and the anticipated project activities (e.g., the type, location, and extent of active building demolition and related material management activities). The selected upwind location(s) for airborne particulate/vapor monitoring will be in areas not likely to be affected by project activities in order to assess background levels relative to the work area. Downwind (based on predominant wind direction) air monitoring locations will be used to assess potential work-related air quality impacts.

If wind direction shifts during the work day for an extended period of time (greater than 50% of the daily monitoring duration), such that the designated upwind and downwind locations no longer fall within acceptable guidelines (+/- 60° compass change from the original wind direction), the PM_{10} monitoring stations will be re-designated so that the upwind and downwind locations are maintained, and the data and related evaluations can be maintained. Air monitoring location changes will be documented in a field logbook and noted in the summary table that will be provided to NYSDEC and NYSDOH.

Monitoring for VOCs and PM_{10} will be performed using real-time monitors during ongoing project activities (e.g., exterior demolition, material loadout, Site restoration). As required by the NYSDOH Generic CAMP, real-time airborne particulate monitoring will be performed continuously during intrusive and/or potential dust generating activities using aerosol monitors equipped with electronic data-logging capabilities at the locations selected as described in Section 5.2.

Calibration checks and routine maintenance of the particulate monitors will be performed at the beginning of each day. The VOC monitors will be calibrated daily with 100 part per million (ppm) isobutylene standard gas; zero calibrations with ambient air will be performed daily for the PM_{10} monitors. The VOC and dust monitors at each station will be housed in a water-tight enclosure affixed to a tripod base. Sample inlet height will be approximately five feet above grade and clear of any nearby obstructions.

Daily monitoring periods will commence at the start of work activities and run through the end of daily work activities (i.e., approximately 8 to 10 hours each day). Monitoring activities may be reduced during periods of rain, as it could damage the instrumentation (i.e., water drawn into the monitor's sample inlet would cause the instrument to malfunction).

The monitors will record the time-weighted average (TWA), calculated for continuous 15-minute increments (e.g., 08:00 to 08:15, 08:15 to 08:30) and any instantaneous readings used to assess appropriate course of action using an electronic data logger and/or in the field logbook.

The monitors will be equipped with high level alarms operating off the monitors instantaneous (VOCs) or one-minute (PM_{10}) TWA concentrations. Each monitor's alarm will activate a notification to alert the on-Site representative (via radio) when the instantaneous or one-minute TWA downwind concentrations are greater than the project's 15-minute action criteria specified in Section 6.

5.4 PCB Sampling and Analysis

Ambient air sampling and PCB analysis will be performed daily during Main Manufacturing Building and outbuilding demolition, material load out, and other potential dust-generating activities. Ambient air sampling for PCB analysis will be performed in accordance with the USEPA Compendium Method TO-10A, *Determination of Pesticides and Polychlorinated Biphenyls in Ambient Air using Low Volume Polyurethane Foam Sampling Followed by Gas Chromatographic/Multi-Detector Detection* (USEPA, 1999). At each location, a 24-hour sample will be collected through a PUF cartridge using a low-volume sample pump with a target sample rate of approximately five liters per minute. In addition to the PUF cartridge, in areas where the work will involve the demolition, removal, and/or handling of materials that contain PCBs above 50 mg/kg, a pre-filter will be included in the sampling train and subject to separate laboratory analysis to assess the possible presence of PCBs attributed to airborne particulates. It is anticipated that adequate dust control measures will be implemented throughout the project (with their effectiveness verified via real-time PM_{10} monitoring data) so that analysis of the pre-filter will not identify any significant PCB-containing particulates. In this event, if it is demonstrated to the satisfaction of NYSDEC that particulate-bound PCBs are not a concern with regard to the applicable Control Levels and Site Perimeter Levels, GE will discontinue the collection and analysis of the pre-filter sample.

The collected PCB samples will be sent under proper chain-of-custody protocols to a GE-approved laboratory for PCB analysis via US EPA Method TO-10A. One field blank and field duplicate per 20 field samples will also be submitted to and analyzed by the laboratory. The laboratory will be a NYSDOH Environmental Laboratory Approval Program (ELAP) certified laboratory, will follow quality assurance/ quality control (QA/QC) requirements in the method, and will provide an analytical report that includes a complete summary of laboratory QA/QC. QA/QC will follow the procedures outlined in and in the *Quality Assurance Project Plan for Environmental Activities at the General Electric Company Fort Edward, New York, Facility* (Environmental Standards, Inc.), submitted to the NYSDEC on September 7, 2018.

All of the daily PCB air samples will be submitted to the analytical laboratory. Per NYSDEC, during periods when activities include: 1) exterior work at the Main Manufacturing Building, 2) interior work involving the removal of structural walls and wood block flooring, or the removal of materials that contain PCBs above 50 mg/kg from the interior of the buildings, or 3) the exterior handling of materials that contain PCBs above 50 mg/kg, the daily samples collected from monitoring stations 12, 13, 14, and 17 (Figure 2) will be analyzed for PCBs at a minimum.

The analysis of the additional samples collected from the other monitoring stations will consider other Site and project considerations, such as particulate monitoring data, wind speed and direction, weather conditions, review of prior monitoring data, etc. A summary of the daily weather conditions, samples selected for initial analysis, and the basis for initial sample analysis selection will be routinely provided to the NYSDEC and NYSDOH for review.

In general, initial sample analysis will be performed on a 5-business-day turnaround time, with the following possible exceptions:

- GE may instruct the analytical laboratory to perform expedited sample analyses when releasing held samples and/or if certain action levels are exceeded.
- During the warmer months typical of May through September, the analytical turnaround time may be shortened to three business days.
- GE may also instruct the analytical laboratory to perform expedited sample analyses if certain PCB action levels are exceeded, as outlined in Section 6 below. If these conditions arise, GE will expedite the analysis of all samples currently in the laboratory's possession and require expedited turnaround time of PCB samples submitted to the laboratory until subsequent daily PCB results are below the action levels.

5.5 Meteorological Monitoring

Meteorological monitoring will be performed continuously at the Site using a portable meteorological monitoring system. The meteorological monitoring system will be mounted on a tripod or mast approximately 10 meters above grade and deployed at a location in accordance with the guidelines established in the *"Quality Assurance Handbook for Air Pollution Measurement Systems, Volume IV: Meteorological Measurements Version 2.0 (Final). EPA-454/B-08-002", March 2008. USEPA"* At a minimum, the meteorological monitoring system will monitor wind speed, wind direction, relative humidity, barometric pressure, and ambient temperature. The meteorological monitoring system will be equipped with electronic data-logging capabilities. Meteorological monitoring data will be recorded and archived electronically and will be available for review as needed. Readings will be available throughout the workday to determine if there is a change in wind direction.

6 RESPONSE ACTION CRITERIA AND CONTROLS

For this project, Control Levels and Site Perimeter Levels have been established to correspond to specific notification and action/mitigation requirements. The levels established for particulates and vapors are based on the NYSDOH Generic CAMP guidelines; the PCB levels have been established by the NYSDEC.

6.1 VOCs

6.1.1 Control Level

If the 15-minute TWA ambient air concentration of VOCs at the downwind monitoring station(s) exceeds 3 ppm above the upwind monitoring station for the same 15-minute TWA, an assessment of potential cause(s) for the exceedance will be initiated to understand the nature of the exceedance and potential mitigative measures. As necessary, vapor suppression controls (discussed below) will be implemented and/or work modified to reduce concentrations, and work activities can continue.

6.1.2 Site Perimeter Level

If the 15-minute TWA ambient air concentration of VOCs at the downwind monitoring station(s) exceeds 5 ppm above the upwind monitoring station for the same 15-minute TWA, work activities will be temporarily halted (when safe to do so), work activities will be evaluated, and air monitoring will continue. If the downwind VOC level readily decreases to less than 5 ppm above the upwind level, work activities will resume with continued monitoring.

If the downwind 15-minute TWA VOC levels persist in excess of 5 ppm above the upwind level, work activities will be discontinued until the source of vapors has been identified, and controls/countermeasures have been implemented to effectively mitigate VOC emissions. During the discontinuation of work, air monitoring will continue. After these steps, work activities can resume provided the VOC levels at the downwind monitoring station(s) are less than 5 ppm above the upwind station for the 15-minute TWA.

6.2 Particulate Matter (PM_{10})

6.2.1 Control Level

If the 15-minute TWA ambient air PM_{10} concentration at a downwind station exceeds 100 µg/m^3 above the background concentration, or if airborne dust is visually observed leaving the work area, dust suppression techniques will be employed. Ongoing work and air monitoring activities may continue following the implementation of dust suppression measures if the downwind 15-minute TWA PM_{10} concentration does not exceed 150 µg/m^3 above the background concentration (15-minute average) and no visible dust is observed migrating from the work area.

6.2.2 Site Perimeter Level

If, after implementation of dust suppression measures, the 15-minute TWA ambient air PM_{10} concentration at a downwind station exceeds 150 µg/m^3 above the background concentration, work activities will be temporarily halted (when safe to do so), work activities will be evaluated, and air monitoring will continue. Work activities will resume only if dust suppression measures and other corrective actions are successful in reducing the downwind PM_{10} concentration to less than 150 µg/m^3 above the background concentration and no visible dust is observed migrating from the work area.

6.3 PCBs

The Control Level and Site Perimeter Level PCB action levels are applicable to each monitoring location where a 24-hour sample is collected and analyzed for total PCBs. In addition to comparison of the daily results to the levels specified below, as the project progresses GE will also calculate an average PCB concentration for each monitoring location. The average will be more representative of an extended project timeframe and may aid in assessment of results.

6.3.1 Control Level

If the PCB results exceed 0.080 µg/m^3, GE will promptly notify NYSDEC and NYSDOH to discuss the sampling results, Site and weather conditions, project activities corresponding to that sampling period, temporal and spatial sampling results, and potential follow-up actions, including expedited laboratory analysis for pending and future samples and release of held samples. Exceedance of this Control Level does not require that GE cease project activities.

6.3.2 Site Perimeter Level

If the PCB results exceed 0.110 µg/m^3, NYSDEC and NYSDOH will be notified to discuss the sampling results, Site and weather conditions, project activities corresponding to that sampling period, temporal and spatial sampling results, and potential follow-up actions, including expedited laboratory analysis for pending and future samples and release of held samples. Work activities can proceed if GE, NYSDEC, and NYSDOH concur that either of the following conditions is applicable:

- Subsequent to the sampling period corresponding to the exceedance, additional targeted and tangible mitigation measures have been implemented for the area/activity of concern, and current conditions and information suggest that ongoing demolition activities are not likely causing an exceedance of the action level.
- The nature, type, location, and/or circumstances of the current remedial actions are notably different from those associated with the sampling period corresponding to the exceedance, such that ongoing demolition activities are not likely to result in an exceedance of the action level.

If it is determined that all or a portion of the work activities are to be discontinued, that decision will be further evaluated by NYSDEC, NYSDOH, and GE upon receipt of the next available sampling data, likely to be received the following business day.

If concentrations exceed 0.5 µg/m^3, then remedial activities will stop and NYSDEC and NYSDOH will be immediately notified.

6.4 Controls and Countermeasures

As noted previously, the particulate monitors will alert the on-Site personnel at or before the Control Level concentration is reached. When alerted, the on-Site personnel will conduct the following:

- Mobilize to the station(s) and evaluate if levels are due to Site-related activities (i.e., ongoing work activities) or non-Site-related activities (e.g., nearby traffic, weather, equipment malfunction). If instrument or equipment problems are noted, the necessary repairs or sensor adjustments will be

made. Non-Site-related instrument responses (i.e., due to off-Site or non-project related sources) will be noted in the log book.

- If levels are determined to be Site-related, the station's subsequent instantaneous levels will be evaluated for either upward or downward trends, current background levels will be assessed, and a determination will made whether sufficient levels are sustained such that the Control Level or Site Perimeter Level may be exceeded.
- If a likely cause for the exceedance is identified, the on-Site personnel will alert GE and GE's construction manager, who will then direct the contractor to implement corrective action activities (if deemed necessary).

Similarly, if the Control Level or Site Perimeter Level is exceeded based on background-corrected readings for VOC and PM_{10}), the on-Site personnel will perform the following:

- Notify GE and GE's construction manager, who will then: 1) direct the contractor to implement the appropriate corrective responses, and 2) notify the NYSDEC and NYSDOH.
- Document the exceedance level and time, individuals notified and the time of notification, action responses, and resulting effect on air quality levels in the monitoring logbook and in the weekly summary report.

If the monitoring results indicate that VOC, PM_{10}, and/or PCB control measures are required, they will be implemented concurrently with the activities identified above. Air emissions associated with demolition, material handling and stockpiling, and certain other work intrusive activities will be controlled via the potential methods described below, contingent upon the specific circumstances, visual observations, and air monitoring results:

- Maintain all stockpiles, access roads, and other work areas to minimize the generation of dust.
- Perform general housekeeping practices to control dust and tracking of materials.
- Excavate, load, handle, and backfill materials in a manner that minimizes the generation of dust (e.g., limit area of open excavation or stockpile size).
- Reduce surface area of exposed materials.
- Modify the area, sequence, and rate of removal activities, or specific methods.
- Modify area, sequence, and rate of excavation/material handling activities, or specific methods.
- Remove debris from temporary access roads and active haul routes. Sweep paved areas that are used or disturbed by work activities or material transport activities.
- Apply water (depending on weather conditions) to areas of potential dust generation, such as access roads, active haul routes, and exposed material piles.
- Limit vehicles to paved or gravel-covered areas and restrict vehicle speeds on temporary access roads and active haul routes.
- Construct and operate a vehicle cleaning pad.

- Cover waste material stockpiles with polyethylene liners. Stockpiles will be securely covered (during both working and non-working hours) except when materials are actively being added to or removed from the stockpile.
- Depending on weather conditions, thoroughly wet open excavations and soil-covered backfilled areas to minimize dust generation.

If all the measures identified above have been implemented to the extent feasible and additional measures are needed to further mitigate airborne VOCs, PM_{10}, and/or PCBs, the following activities will be considered:

- Apply vapor-suppressant foam, solution, and/or hydromulch to stockpiles, equipment buckets, and demolition debris when loading transport vehicles.
- Utilize perimeter water spray and water cannons (misters) to increase dust suppression.

6.5 Data Collection and Reporting

GE will submit a weekly summary of the air monitoring results to the NYSDEC and NYSDOH. The summary will include, but not be limited to: the reporting period; a summary of PCB analytical results; a description of air monitoring exceedances (if any); work activities associated with the exceedances; daily weather conditions; and any corrective actions implemented to address the exceedances.

If complaints are received from the public regarding odor or dust, the controls listed in Section 6.4 may be implemented, as needed, and NYSDEC and NYSDOH will be notified.

FIGURES

LEGEND:

APPROXIMATE PROPERTY BOUNDARY

PARCEL BOUNDARY

NOTES:

1. ALL BUILDING LOCATIONS AND SITE FEATURES ARE APPROXIMATE.
2. AERIAL PHOTO WAS OBTAINED FROM ESRI ARCGIS ON OCTOBER 4, 2017

0 200' 400'

GRAPHIC SCALE

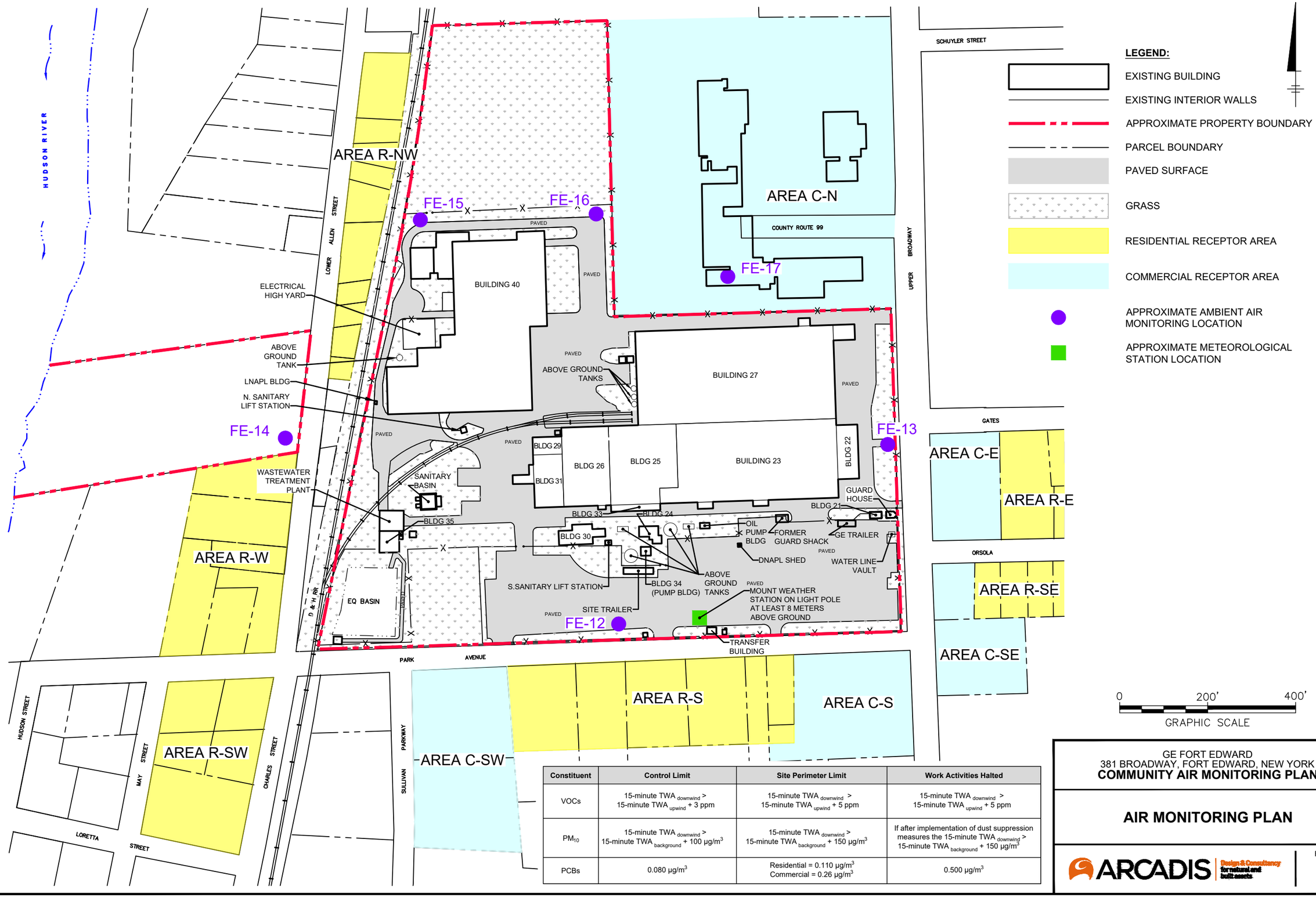
GE FORT EDWARD
381 BROADWAY, FORT EDWARD, NEW YORK
COMMUNITY AIR MONITORING PLAN

SITE LOCATION

ARCADIS Design & Consultancy for natural and built assets

FIGURE
1

CITY: Milwaukee, WI DIV/GROUP: ENV DB: C. McKeough PIC:(Opt) PM:(Reqd) TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
C:\Users\gstowell\OneDrive - ARCADIS\BIM 360 Docs\GE CORP ENV PROG\GE FT EDWARD BLDG 40 BLDG MATL CHARACTER\2018\ALL31333.1000\01-DWG\FIG1-CAMP-SITELOCATION.dwg LAYOUT: 1 SAVED: 9/7/2018 10:43 AM ACADVER: 21.0S (LMS TECH) PAGESETUP: C-LB-PDF-GMS
PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 9/7/2018 10:44 AM BY: STOWELL, GARY
XREFS:
IMAGES:
X-CAMP-BORDER-BL
X-BASE-2



Constituent	Control Limit	Site Perimeter Limit	Work Activities Halted
VOCs	15-minute TWA $_{downwind}$ > 15-minute TWA $_{upwind}$ + 3 ppm	15-minute TWA $_{downwind}$ > 15-minute TWA $_{upwind}$ + 5 ppm	15-minute TWA $_{downwind}$ > 15-minute TWA $_{upwind}$ + 5 ppm
PM_{10}	15-minute TWA $_{downwind}$ > 15-minute TWA $_{background}$ + 100 µg/m^3	15-minute TWA $_{downwind}$ > 15-minute TWA $_{background}$ + 150 µg/m^3	If after implementation of dust suppression measures the 15-minute TWA $_{downwind}$ > 15-minute TWA $_{background}$ + 150 µg/m^3
PCBs	0.080 µg/m^3	Residential = 0.110 µg/m^3 Commercial = 0.26 µg/m^3	0.500 µg/m^3

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COMMUNITY AIR MONITORING PLAN

AIR MONITORING PLAN

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FIGURE
2