Community Air Monitoring Plan

Canastota Non-Owned Former MGP
Canastota, New York
NYSDEC Site #: 727014

Submitted to:
National Grid, USA
300 Erie Boulevard West
Syracuse, NY 13202

Submitted by:
GEI Consultants, Inc. DBA GEI Consultants Engineering, Geology, Architecture & Landscape Architecture
950 Danby Road, Suite 201-F
Ithaca, NY 14850
607.216.8955

February 2026
Project No. 034390

Colby Jesset, P.E.
Project Manager

Christopher T. Gordon, PMP
Air Monitoring Practice Leader

Table of Contents

List of Tables

Appendices

CJ/CTG/JD:bdp
B:\Working\NATIONAL GRID\034390 Canastota MGP\Construction Management\Electric Utility Relocation 2025\CAMP\Working\Resubmittal 2 - 2026\034390_Canasota CAMP_2026-02-04.docx

Acronyms and Abbreviations

CAMP	Community Air Monitoring Plan
DPW	Department of Public Works
GEI	GEI Consultants, Inc. DBA GEI Consultants Engineering, Geology, Architecture & Landscape Architecture
HASP	Health and Safety Plan
MGP	Manufactured Gas Plant
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
PAH	Polycyclic Aromatic Hydrocarbons
PID	Photo ionization detector
PM_{10}	Particulate matter of 10 microns in diameter or less
ppm	Parts per million
SVOC	Semi Volatile Organic Compounds
TVOC	Total Volatile Organic Compounds
$\mu g/m^3$	Micrograms per cubic meter
ISS	In-Situ Solidification
VOC	Volatile Organic Compounds

1. Introduction

This document presents the Community Air Monitoring Plan (CAMP) that will be implemented during Remedial Action and associated utility installation activities of the Canastota Non-Owned Former manufactured gas plant (MGP) site, located in the Village of Canastota, New York (the Site). A CAMP is required by the New York State Department of Environmental Conservation (NYSDEC) and the New York State Department of Health (NYSDOH) at sites where ground intrusive activities may result in airborne release of contaminants. Community air monitoring will be performed for total volatile organic compounds (TVOCs), and particulates (dust) that are 10 microns in diameter or less (PM_{10}), at the Site.

The Site is located on East North Canal Street in the Village of Canastota, New York. The former MGP operations on Site were conducted within a parcel of land that is currently owned by the Village of Canastota. This parcel is currently used by the Village of Canastota Department of Public Works (DPW) for its garage and equipment facility, and includes the garage building, a parking lot, and gravel or grass covered areas.

This CAMP applies to the utility installation phase of work and the larger Remedial Action for the Site.

Upcoming utility installation fieldwork involves the excavation of an approximately 24-inch-deep, 200-linear-foot trench for the installation of a new underground electrical service line near the southeast corner of the Site, with the trench extending from a utility pole adjacent to Canal Street to an existing electric service meter pedestal adjacent to the sanitary sewer pumping station. Handheld and portable air monitoring equipment will be used to collect data during working hours while the new electric service is being installed, to implement the CAMP.

The Remedial Action fieldwork involves the excavation of MGP-impacted soils and subsurface materials, in-situ solidification (ISS) of impacted materials, management and transport of excavated materials to approved off-site disposal facilities, and Site restoration. Additional activities include well abandonment, asphalt removal and repaving, sanitary sewer force main installation, and temporary shoring system installations. For the Remedial Action activities, CAMP will be implemented using automated air monitoring equipment located at the Site's perimeter.

Future intrusive work that may encounter or disturb the remaining on-site impacts, including modifications or repairs to the existing cover system will be conducted in compliance with the Site Management Plan and in accordance with the procedures defined in this CAMP. The objectives of this CAMP are to:

- Minimize the potential emission of TVOCs and particulates during ground intrusive activities.
- Provide an early warning system so that potential emissions can be controlled on Site at the source.
- Document the measurements of TVOCs and particulates during working hours.

2. Air Monitoring Equipment and Methods

This section provides instructions for conducting the CAMP, details on the equipment to be used and what constituents will be monitored. At the Site, TVOCs and PM_{10}, will be measured during remedial excavation and backfilling, utility trenching and installation, and during the decommissioning of on-site wells.

In addition to the CAMP, work zone air monitoring will be performed during remedial activities when impacted soil or groundwater may be encountered. GEI personnel will be responsible for providing CAMP, and the Contractor will be responsible for work zone air monitoring. The work zone air monitoring requirements, equipment, and action levels are described in the Site-specific HASP for this project. When work zone TVOC or PM_{10} readings are found to exceed the downwind CAMP limits, the field staff will check the upwind and downwind air monitoring instruments to assess whether control measures will be required. These control measures are further described in Section 3.

2.1. Monitoring Locations

During utility installation activities, two community air monitoring locations will be established at the start of each workday: one location that is upwind of the work zone, and one location that is downwind of the work zone.

The purpose of the upwind station will be to assess the background concentration of TVOCs and PM_{10} at the Site. Each downwind monitoring station will be used to assess compliance with the NYSDEC/NYSDOH specified Action Levels for TVOCs and PM_{10}. The upwind TVOC and PM_{10} measurements will be subtracted from the downwind measurements to compare the downwind instrument readings to the CAMP Action Levels.

During Remedial Action activities, four automated air monitoring locations will be located around the Site perimeter. These are described in more detail in Section 2.2. Handheld PIDs will also be used during both phases for as-needed monitoring in the immediate vicinity of intrusive work being performed.

The location of each monitoring station will be noted on the ***CAMP Daily Field Report Form*** along with the start and stop time of the monitoring. A sample form is provided in Appendix A. The locations of the instruments may be changed during the day to adapt to changing wind directions, or to accommodate changes in field and construction conditions.

If the work zone is less than 20 feet from the nearest occupied building, the downwind air monitoring station will be positioned near the air intake for the building or at the most sensitive exposure point for the downwind receptors. Background measurements inside the building will be made prior to the start of work. If exceedances of the action levels are measured at the outside wall of the building, additional measurements will be made inside the building using portable meters.

If necessary, precautions to minimize the release of VOCs and particulates will be taken at the work zone, and engineering or work controls used to protect the downwind receptor. These controls for minimizing releases from the work zone are discussed in Section 3.

2.2. Air Monitoring Equipment

Two different types of air monitoring equipment will be used for this project during the different phases of work. The descriptions of the equipment are described below.

2.2.1. Utility Trenching and Installation.

During the utility trenching and installation activities, the CAMP program will include two portable air monitoring stations. These stations will run during working hours only. Each station will consist of a PID, dust monitor, and a data logging device with modem communication for data transmittal and alerting. Real time data will be transmitted and stored on an online data hosting platform.

Equipment will be mounted on a tripod in a vented protective case and programmed to record 15-minute averages. The monitoring equipment will be calibrated at the start of each workday and if needed during the day. GEI personnel will check the instrumentation at each location regularly during the workday to ensure that they are operating properly.

TVOC monitoring will be performed using a RAE Systems® MiniRAE 3000 photoionization detector (PID), or equivalent equipped with a 10.6 eV bulb. Particulate monitoring will be performed using MetOne ES 642 aerosol (dust) meters, or equivalent, affixed with cyclone inlets that are set to measure PM_{10}. The equipment will be set to record 15-minute running average concentrations for comparison to the Response and Action Levels.

Periodic TVOC measurements will be taken with an additional PID on an as-needed basis, during routine construction observations.

Fugitive dust migration will be visually assessed during the work activities, and observations will be recorded in the field book. Per NYSDEC requirements, visible dust migration is not permissible. If visible dust is observed to be migrating from the work zone, the work will be stopped, and dust control measures implemented.

2.2.2. Remedial Action

During the Remedial Action, real-time monitoring for TVOC and PM_{10} will be performed at four solar-powered air monitoring stations. Each air monitor will consist of an Aeroqual® AQS-1® monitoring station with an internal module that measures TVOCs, an optical sensing aerosol meter (dust monitor) to measure PM_{10}, and a data logging device with modem communication for data transmittal and alerting. One air monitor will have a weather station that will be used to assess wind speed and direction, and other meteorological parameters. Each system will continuously measure and record air quality while deployed.

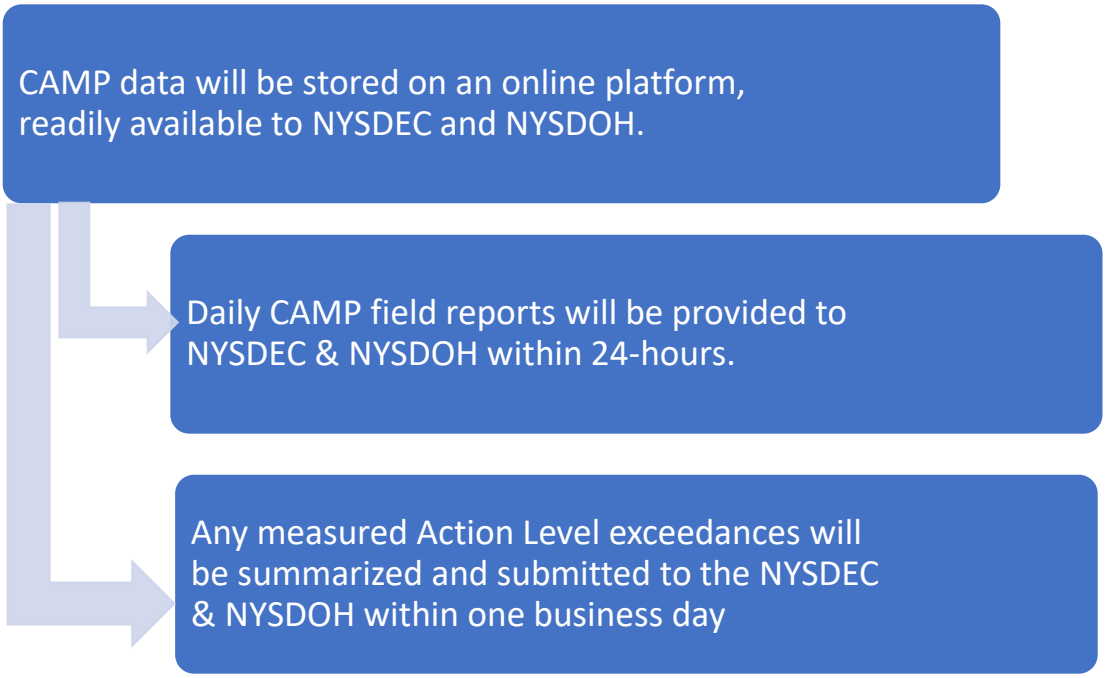
Periodic TVOC measurements will be taken with an additional PID on an as-needed basis, during routine construction observations.

Fugitive dust migration will be visually assessed during the work activities, and observations will be recorded in the field book. Per NYSDEC requirements, visible dust migration is not permissible. If visible dust is observed to be migrating from the work zone, the work will be stopped, and dust control measures implemented.

2.2.3. Reporting

CAMP data will be stored on an online platform and saved for review. Daily CAMP field reports will be provided to the NYSDEC and the NYSDOH within 24 hours of completion of the previous day's work. The data hosting website's log-in information will be provided to NYSDEC and NYSDOH for real-time data access and review.

If TVOC or PM_{10} Response and Action Levels are exceeded during the workday, the construction activities observed, the time(s) of the exceedance(s), and the implemented mitigation control measures will be recorded on the Daily Field Report and reported to the on Site NYSDEC representative. If an on-site representative is not present, exceedances will be reported to the NYSDEC project manager within one business day.



2.3. Odor Monitoring

The field investigation personnel will record observations of odors generated during the implementation of the Remedial Action. If odors are observed in the work zone during intrusive activities, observations

will also be made at the downwind limit of the Site. The observations will be made to assess the potential for significant odors reaching on-site receptors or being transmitted off-site.

Upon detection of odors at the Site perimeter, mitigation control measures, starting in the work zone, will be implemented. These mitigation control measures are further described in Section 3.

There is no Action Level specified for odors. If odors persist at the downwind receptors or property line after control measures are carried out, the odor conditions will be discussed with the National Grid and NYSDEC project managers. If necessary, the odor conditions will be discussed with the Canastota DPW staff or neighbors. For further information regarding community response measures, please see Section 5.

3. Threshold Levels and Mitigation Control Measures

This section outlines the monitoring threshold levels and procedures to be used to control TVOCs, odors, and particulates that may be generated during the Remedial Action or associated utility installation field activities. The primary actions that may generate odors are impacted material excavations and backfill, and asphalt removal and repaving. The remainder of this section is intended to provide Site managers, representatives of NYSDEC and NYSDOH, and the public with information summarizing typical odor control options, and to provide some guidance for their implementation. A description of potential sources of odors and methods to be used for odor control are presented in the following sections.

3.1. Potential Sources of Odors and TVOCs

Generally, the residual impacts encountered at former MGP sites are well defined. They are related to residual coal tar like materials and petroleum, and principally contain VOCs, polycyclic aromatic hydrocarbons (PAHs), and several inorganic constituents, including metal complexed cyanide compounds, and metals. Constituents of tar or petroleum products can produce odor emissions during investigation activities when they are unearthed during excavations. When this occurs, VOCs and light end semi volatile organic compounds (SVOCs) can volatilize into the ambient air. Some of these compounds can cause distinctive odors that are similar to mothballs, roofing tar, or asphalt driveway sealer. It is important to note that the CAMP will provide real-time monitoring of VOCs and particulates during the fieldwork to monitor for a potential release of constituents which may exceed the exposure limits for downwind receptors.

3.2. Monitoring Threshold Levels and Mitigation Control Measures

The air monitoring threshold levels and mitigation control measures for TVOCs and PM_{10} are presented in Table 1 below.

Table 1. Air Monitoring Threshold Levels and Mitigation Control Measures

TVOCs	
Threshold Level	**Mitigation Control Measures**
Alert ≥3.7 ppm at the wall of an occupied structure or at an air intake	• Check the indoor air concentration and compare with background measurements taken previously
Action ≥5 ppm above background for 15-minute average	• Temporarily halt work activities • Continue monitoring, especially inside of occupied structures • If TVOC concentrations decrease (per instantaneous readings) below 5.0 ppm over background, work activities can resume

TVOCs	
Threshold Level	**Mitigation Control Measures**
Action Persistent levels >5.0 ppm over background but <25.0 ppm	• Halt work activities • Identify source of vapors • Corrective action to abate emissions • Continue monitoring • Resume work activities if TVOC concentrations 200 feet downwind of the property boundary or half the distance to the nearest potential receptor are <5.0 ppm for a 15-minute average
Stop-Work >25 ppm at the perimeter of the work zone	• Shut down work

PM_{10}	
Threshold Level	**Mitigation Control Measures**
Alert ≥100 µg/m^3 above background for 15-minute average or visual dust observed leaving the site	• Apply dust suppression • Continue monitoring • Continue work if downwind PM_{10} concentrations s are <150 µg/m^3 above upwind measurements and no visual dust leaving the Site
Action ≥150 µg/m^3 above background for 15-minute average	• Stop work • Reevaluate activities • Continue monitoring • Continue work if downwind PM_{10} concentrations are <150 µg/m^3 above upwind measurements and no visual dust leaving the Site

Sources:

- NYSDOH Community Air Monitoring Plan, as published in NYSDEC DER-10, Appendix 1A, 2010.
- Fugitive Dust and Particulate Monitoring, NYSDEC DER-10, Appendix 1B, 2010.
- Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures, NYSDOH.

3.3. General Site Controls

Several general excavation Site controls that will be implemented include:

- Minimize the amount of time that impacted material is exposed to ambient air at the Site.
- Proper sequencing of remedial activities.
- Meteorological conditions are also a factor in the generation and migration of odors. Some site activities may be limited to times when specific meteorological conditions prevail, such as when winds are blowing away from a specific receptor.

3.4. Secondary Site Controls

The following secondary controls may be utilized at the discretion of on-site personnel to proactively mitigate the potential for dust, odor, or TVOC migration off-site. GEI personnel will work through the applicable list with National Grid and NYSDEC. Final selection of controls will be dependent on field conditions encountered.

Secondary controls include the following:

- For stockpiled impacted soil, temporary tarps or polyethylene covers will be used to control odors, VOCs, and dust.
- For stockpiled impacted soil, Lime Kiln Dust (LKD) will be utilized to dry and stabilize excavated materials.
- Supplemental monitoring will take place during remedial excavations, by using a handheld PID (such as an MiniRAE unit or equivalent). GEI will conduct walk-around checks of the perimeter of the Site to monitor TVOC, PM_{10} and odor will occur on a regular and as-needed basis.
- Water will be sprayed onto dry soils to minimize the generation of dust, where feasible. A surficial application of magnesium chloride (or equivalent), is also considered for use during cold weather months to contain surficial dust and mitigate the generation of surficial dust plumes.
- The placement of portable barriers close to small active source areas (excavations) can elevate the discharge point of emissions to facilitate dispersion and minimize the effect on downwind receptors. The barriers can be constructed using materials such as plastic “Jersey barriers”, or fence poles and visual barrier fabric/plastic. The barriers are placed as temporary two- or three-sided structures around active excavations or other intrusive investigation areas, oriented such that the barriers are placed on the upwind and downwind sides of the source. If only one side of the source can be accessed, then the barrier should be placed on the downwind side.
- Three agents that can be sprayed over impacted soil have been used effectively to control odor or dust emissions during remedial activities at former MGP sites. They include an odor suppressant solution (BioSolve®), odor-control foam, and Hydromulch. These agents will be used where tarps cannot be effectively deployed over the source material, or where tarps are ineffective in controlling odors:
    - **BioSolve® and odor control foam:** Provide immediate, localized control of odor emissions.
    - **Hydromulch:** Although it is unlikely that it will be necessary, modified Hydromulch slurry may be used to cover inactive sources for extended periods of time (up to several days). The Hydromulch, typically cellulose fibers (HydroSeal®), is modified by mixing a tackifier (glue) with the mulch and water to form a slurry. It is applied using a standard hydroseed applicator to a thickness of ¼-inch. The material forms a sticky, cohesive, and somewhat flexible cover. Reapplication may be necessary if the applied layer becomes desiccated or begins to crack.
- If odors, dust, and TVOCs continue to pose as issues after mitigation controls have been implemented, an excavation enclosure (e.g., Sprung structure) equipped with a vapor collection and treatment system may be constructed over the excavation area(s) to reduce the potential for off-site migration of vapors, dust, and nuisance odors during excavation activities.

3.5. Building Controls

Controls for minimizing the impacts to occupied buildings include temporary shut down and closure of air intakes within the downwind zone, or deferral of work to times when building occupants are not present.

4. Documentation and Reporting

The attached Daily Field Report Form will be filled out each day to record the details of the CAMP work. The form will be used to record the following information:

- Date and weather, with significant changes noted which may affect the positioning of the meters or recording of the data.
- Calibration results for the instruments.
- Locations of the upwind and downwind monitoring stations, and changes made to the locations during the day to adjust for changing work locations or wind directions.
- General Site observations such as daily construction activities, and documentation of recorded or observed exceedances.

Additional information will be noted within the project field book(s), as necessary.

CAMP odor monitoring results will be recorded in the field book and the Daily CAMP Field Report and will also be available for review by the appropriate regulatory agencies.

5. Community Response Plan

Prior to the start of remedial actions, general Site and remedial information will be posted at the Site entrance for public access, with DEC Fact Sheets hand-delivered to residents within the immediate proximity of the Site. The GEI Project Manager's phone number will also be placed at the entrance to the Site to encourage public involvement, and to give avenues of contact for public questions or concerns. The GEI Project Manager will be assigned to receive incoming calls regarding the Site, and to field any questions made by the public regarding ongoing remedial actions or potential nuisances.

Odor, TVOC, and dust complaints received from the public will be evaluated and verified based on the following:

- Date and time of complaint;
- Location and nature of work activities being performed at the Site;
- Location and nature of non-project-related work activities being performed in the surrounding community; and
- Assessment of prevailing wind direction and other local meteorological conditions at the time of the complaint. This data will be assessed from the weather station on-site.

NYSDEC, NYSDOH, the Engineer, and the Responsible Party will be notified of all complaints within 24 hours. In response to a verified odor complaint, perimeter monitoring will continue and additional odor, vapor, and dust controls will be employed to mitigate Site-related odor emissions. Construction techniques will also be evaluated and modified, if necessary and appropriate.

Appendix A Community Air Monitoring Daily Field Report Form

Data Collection Forms and Worksheets
Community Air Monitoring Plan
Canastota Former MGP
Canastota, New York

Daily CAMP Report

System Operations	General Observations
Sampling Date _____	General Weather Conditions
System Start Time _____	
System Stop Time _____	
Total Hours Monitored _____	General Description of Site Activities:
System Calibrations _____	
(Time/Status) _____	
_____	

System Alarm Log

Time	Station No.	Alarm (Dust, VOC)	Location (UW, CW, DW)	Dust/TVOC/Odor 15-min avg conc. Rang	Total # of Alarms	Notes	Site Person/Time Notified

Notes:

	Particulate (15-min)	TVOC (15-min)
Alert Limit:	N/A	3.7 ppm
Response Limit:	100 ug/m^3	5.0 ppm
Action Limit:	150 ug/m^3	25 ppm

Notes:

UW - Upwind
CW - Crosswind
DW - Downwind

P - Particulate/ Dust
Particulate recorded in ug/m^3
V - Total VOC
Total VOC measured in ppm

Field Representative:
Date: _____

Page 1 of __1__