

# NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Region 1 Main Office

SUNY @ Stony Brook, 50 Circle Road, Stony Brook, NY 11790

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January 27, 2016

United Properties Corp.  
Attn: Denis Rodger  
1975 Hempstead Turnpike, Suite 309  
East Meadow, NY 11554  
Email: denisrodger@upcli.com

**Re: Community Air Monitoring Plan (CAMP) date July 2015.**

**Jay's Lucky Cleaners  
3220 to 3224 Long Beach Road, Oceanside  
New York 11572  
Site No.: C130219**

Dear Mr. Rodger:

The New York State Department of Environmental Conservation (NYSDEC) & NYS Department of Health (NYSDOH) have reviewed the Community Air Monitoring Plan (CAMP) date July 2015, prepared and submitted by P.W. Grosser Consulting Inc. on your behalf for the above referenced site.

Please see the following comments;

1. Section 1.1: Attach "1. NYDOH Generic Community Air Monitoring Plan and 2. Fugitive Dust and Particulate Monitoring, DER – 10 Technical Guidance".
2. Section 2.1: Replace "perimeter" by "downwind perimeter".
3. Section 2.1: Replace "during intrusive" by "during all ground intrusive".
4. Table 1-1: Replace "perimeter" by "downwind perimeter".
5. Table 1-1: Replace "during intrusive" by "during all ground intrusive".
6. Table 1-1: Instead of 15 minutes periodical monitoring as proposed, according to DOH's generic CAMP, continuous monitoring should occur for all ground-intrusive activities such as drilling. Periodic monitoring for VOC's will be required during non-intrusive activities such as ground water sampling from existing monitoring well.
7. Table 1-2: Replace "Aerosol" by "Particulates (Dust, Mist or Aerosol)".
8. Table 1-2: Aerosol Monitor; Site Action; If the downwind PM-10 particulate level is 100 micrograms per cubic meter ( $\text{mcg}/\text{m}^3$ ) 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



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that downwind PM-10 particulate levels do not exceed 150 mcg/m<sup>3</sup> above the upwind level and provided that no visible dust is migrating from the work area.

9. Table 1-2: Aerosol Monitor; Site Action; If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 mcg/m<sup>3</sup> 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<sup>3</sup> of the upwind level and in preventing visible dust migration.
10. Section 3.0: Add  
*"Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures:*

*When work areas are within 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 should be considered to prevent exposures related to the work activities and to control dust and odors. Consideration should be given to implementing the planned activities when potentially exposed populations are at a minimum, such as during weekends or evening hours in non-residential settings.*

*If total VOC concentrations opposite the walls of occupied structures or next to intake vents exceed 1 ppm, monitoring should occur within the occupied structure(s) (with appropriate pre-determined response levels and actions.) Background readings in the occupied spaces must be taken prior to commencement of the planned work. Any unusual background readings should be discussed with NYSDOH prior to commencement of the work.*

*If total particulate concentrations opposite the walls of occupied structures or next to intake vents exceed 150 mcg/m<sup>3</sup>, work activities should be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150 mcg/m<sup>3</sup> or less at the monitoring point.*

*Depending upon the nature of contamination and remedial activities, other parameters (e.g., explosivity, oxygen, hydrogen sulfide, carbon monoxide) may also need to be monitored. Response levels and actions should be pre-determined, as necessary, for each site".*

11. Section 3.0: Add  
*"Special Requirements for Indoor Work With Co-Located Residences or Facilities;*

*Unless a self-contained, negative-pressure enclosure with proper emission controls will encompass the work area, all individuals not directly involved with the planned work must be absent from the room in which the work will occur. Monitoring requirements shall be as stated above under "Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures" except that in this instance "nearby/occupied structures" would be adjacent occupied rooms. Additionally, the location of all exhaust vents in the room and their discharge points, as well as potential vapor pathways (openings, conduits, etc.) relative to adjoining rooms, should be understood and the monitoring locations established accordingly. In these situations, it is strongly recommended that exhaust fans or other engineering controls be used to create negative air pressure within the work area during remedial activities. Additionally, it is strongly*

*recommended that the planned work be implemented during hours (e.g. weekends or evenings) when building occupancy is at a minimum".*

12. Section 7.1: Replace "calibrated" by "calibrated in accordance with manufacturer's instructions and specifications".

Please incorporate these revisions into the draft CAMP and submit an electronic copy for NYSDEC and NYSDOH review and approval.

If you should have any questions, please feel free to contact me at (631) 444-0242 or [jahan.reza@dec.ny.gov](mailto:jahan.reza@dec.ny.gov).

Sincerely,



Jahan Reza  
Project Manager

cc: Jim Harrington (NYSDEC)  
Walter Parish, (NYSDEC)  
Scarlett McLaughlin (NYSDOH)  
Kris Almskog (PWGC)  
Thomas Melia (PWGC)