October 10, 2025

Amy J. Calapa, P.G.
New York State Department of Environmental Conservation
Division of Environmental Remediation
Region 1
50 Circle Road
Stony Brook, New York 11790

Re: 2025 Supplemental Remedial Investigation Work Plan
250 East Main Street, LLC
250 East Main Street, Bay Shore, New York
NYSDEC Site No. C152245

Dear Ms. Calapa:

On behalf of 250 East Main Street, LLC (250 East Main Street), Roux Environmental Engineering and Geology, D.P.C. (Roux) has prepared this 2025 Supplemental Remedial Investigation Work Plan (2025 SRIWP) for the site located at 250 East Main Street (Tax Lot 69-001, Block 1), Bay Shore, New York (Site). The Site is enrolled in the New York State Department of Environmental Conservation (NYSDEC) Brownfield Cleanup Program as Site No. C152245. The purpose of this proposed 2025 Supplemental Remedial Investigation (2025 SRI) is to collect additional on-Site and off-Site data to address comments provided by NYSDEC and New York State Department of Health (NYSDOH) in a letters dated May 7, 2024 and August 1, 2025.

**Background**

To date, multiple investigations have been performed at the Site to delineate the nature and extent of contamination. A Remedial Investigation Report (RIR) summarizing the results of the multiple investigations was submitted to NYSDEC in June 2020. Based on previous discussions with NYSDEC/NYSDOH, a Remedial Action Work Plan (RAWP), dated November 2, 2021, was developed for the Site as it was determined that additional investigation activities, if necessary, would be performed as part of the remedial action, as described in the RAWP. A 45-day public comment period was completed for the RAWP from April 13, 2022, through May 28, 2022. During a conference call held on April 5, 2024, and as described in the NYSDEC letter dated May 7, 2024, NYSDEC and NYSDOH have reviewed the RAWP and are requesting additional investigation activities both on-Site and off-Site, prior to formal RAWP approval. Following submission of the initial version of this 2025 SRIWP on March 14, 2025, NYSDEC provided comments in a letter dated August 1, 2025. The remainder of this 2025 SRIWP describes the proposed scope of work and the rationale. All SRIWP work will be completed in accordance with the Site Specific Health and Safety Plan included in Appendix G of the original Remedial Investigation Work Plan dated June 14, 2018.

**Proposed Scope of Work**

The Proposed Scope of Work for this 2025 SRIWP will include the following:

- On-Site Monitoring Well Inventory and Sampling
- On-Site 2025 SRI Activities
- Off-Site 2025 SRI Activities



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California ■ Illinois ■ Massachusetts ■ New Jersey ■ New York ■ Texas ■ Virginia

The 2025 SRI will proceed in a step-wise approach, with the data produced during each step being evaluated before proceeding to the next.

**On-Site Monitoring Well Inventory and Sampling**

Prior to SRI activities commencing, a monitoring well inventory and comprehensive groundwater sampling round will be performed at the Site. This task will be performed to collect a current data set of groundwater conditions at the Site, as the last comprehensive groundwater sampling was performed in July 2018. The monitoring well inventory will be performed prior to groundwater sampling activities to determine if any of the existing monitoring wells at the Site have been damaged and/or cannot be located.

Once the monitoring wells are located and their current condition is determined, each useable monitoring well will be redeveloped and then sampled for volatile organic compounds (VOCs) via USEPA Method 8260 and the Emerging Contaminants (ECs) per- and polyfluoroalkyl substances (PFAS) via EPA Method 1633A and 1,4-dioxane via EPA Method 8270E, one week following redevelopment activities. The groundwater sampling will be performed via low flow groundwater methods, in accordance with the Remedial Investigation Work Plan (RIWP), dated June 14, 2018.

**On-Site 2025 SRI Activities**

Once all newly collected groundwater data is received, Roux will determine if any of the proposed locations for this 2025 SRI need to be modified. The proposed locations for the on-Site 2025 SRI are shown on Figure 1.

As requested in the May 7, 2024 and August 1, 2025 comment letters, the proposed scope of the on-Site 2025 SRI will be as follows:

| Location | Scope | Depth (ft bls) | Analyses | Rationale |
|---|---|---|---|---|
| On-Site Source Area | Installation and sampling of a groundwater profile boring (GWPB-1) in the vicinity of RI borings DGW-1 and RSB-16. | RGWPB-1 (0-5)<br>RGWPB-1 (5-10)<br>RGWPB-1 (10-15)<br>RGWPB-1 (15-20)<br>RGWPB-1 (20-25)<br>RGWPB-1 (25-30)<br>RGWPB-1 (30-35)<br>RGWPB-1 (35-40)<br>RGWPB-1 (40-45)<br>RGWPB-1 (45-50) | Groundwater: VOCs<br>ECs (only at 0-5 and 5-10 intervals) | To substantiate conflicting datasets and delineate vertical groundwater contamination in the vicinity of RI boring locations DGW-1 and RSB-16. |
| On-Site Source Area | Installation and sampling of one pair of shallow and deep monitoring wells (MW-11S & MW-11D) within the source area. Monitoring well screened intervals will be determined following the groundwater profile borings (GWPB-1 and GWPB-2). | MW-11S (TBD)<br>MW-11D (TBD) | Groundwater: VOCs | To delineate vertical groundwater contamination at the on-Site source area. |

| Location | Scope | Depth (ft bls) | Analyses | Rationale |
|---|---|---|---|---|
| Downgradient property boundary | Installation and sampling of a groundwater profile boring (GWPB-2) in the vicinity of the downgradient property boundary and MW-3. | RGWPB-2 (0-5)<br>RGWPB-2 (5-10)<br>RGWPB-2 (10-15)<br>RGWPB-2 (15-20)<br>RGWPB-2 (20-25)<br>RGWPB-2 (25-30)<br>RGWPB-2 (30-35)<br>RGWPB-2 (35-40)<br>RGWPB-2 (40-45)<br>RGWPB-2 (45-50) | Groundwater: VOCs<br>ECs (only at 0-5 and 5-10 intervals) | To substantiate conflicting datasets and delineate vertical groundwater contamination near the downgradient property boundary and MW-3. |
| Downgradient Property Boundary | Installation and sampling of one pair of shallow and deep monitoring wells (MW-13S and MW-13D), near MW-3. Monitoring well screened intervals will be determined following the groundwater profile borings (GWPB-1 and GWPB-2). | MW-13S (TBD)<br>MW-13D (TBD) | Groundwater: VOCs | To delineate vertical groundwater contamination at the downgradient property boundary near MW-3. |
| Formerly Abated Drywell Structure | Advancement of one soil boring at the abated drywell structure (RSB-17), collection of one soil sample, and installation and sampling of shallow and deep monitoring wells (MW-12S and MW-12D) at the boring location. Monitoring well screened intervals will be determined following the groundwater profile borings (GWPB-1 and GWPB-2). | RSB-17 will be advanced to a minimum depth of 25 ft bls; soil sample will be collected from the suspected invert of the former structure or the interval exhibiting the greatest evidence of contamination; if evidence of contamination is observed at the deepest interval, drilling will continue until impacts are no longer observed.<br><br>MW-12S(TBD)<br>MW-12D(TBD) | Soil and Groundwater: Part 375 VOCs, SVOCs, metals, pesticides, PCBs & ECs | To delineate soil and groundwater contamination at/near the formerly abated structures. The depth to the bottom of the formerly abated structures is estimated to be 10 ft bls. |

| Location | Scope | Depth (ft bls) | Analyses | Rationale |
|---|---|---|---|---|
| Formerly Abated Septic Structures | Advancement of one soil boring per formerly abated septic structure (RSB-18, RSB-19), collection of one soil sample per soil boring, and the collection of groundwater grab samples from RSB-18 and RSB-19, via temporary monitoring wells or Geoprobe groundwater sampling system. | RSB-18 & RSB-19 will be advanced to a minimum depth of 25 ft bls; soil and groundwater grab samples will be collected from the suspected invert of the former structure or the interval exhibiting the greatest evidence of contamination; if evidence of contamination is observed at the deepest interval, drilling will continue until impacts are no longer observed. | Soil and groundwater: Part 375 VOCs, SVOCs, metals, pesticides, PCBs & ECs | To delineate soil and groundwater contamination at/near the formerly abated septic structures. The depth to the bottom of the formerly abated structures is estimated to be 10 ft bls. |

Vertical Profile Borings

Prior to permanent monitoring well advancement, two groundwater profile borings will be advanced – one near former boring locations RSB-16 and DGW-1, and the other near the downgradient property boundary and MW-3. Prior to advancement, each location will be pre-cleared to five feet below land surface (ft bls) using non-intrusive methods such as hand tools and vacuum excavation, to verify the absence of utilities and/or other subsurface features. Should a utility or other feature be observed during pre-clearance activities, the proposed location will be relocated.

Based on previous groundwater sample results in these areas, the profile borings will be advanced to a depth of 50 ft bls with a groundwater grab sample collected every five ft for VOC analysis. The two shallowest five-ft interval groundwater grab samples will also be analyzed for ECs. Groundwater grab samples will be collected utilizing the GeoProbe® groundwater sampling system. This system utilizes an expendable drive point and drop-out well screen that can be set at a desired five-foot interval to allow for discrete groundwater sampling. Discrete groundwater grab samples will be collected starting from the 45-50 ft interval, working upwards towards land surface in five-foot intervals. All groundwater grab samples will be collected utilizing a check valve and tubing. Once each groundwater profile boring is completed and samples have been collected, the boreholes will be backfilled with cement-bentonite grout to surface.

Results of the vertical delineation groundwater sampling will be provided to NYSDEC and will be used to determine appropriate permanent monitoring well construction parameters including screened interval(s). If possible, the vertical profile borings will be completed during the initial on-Site monitoring well inventory and sampling scope of work to reduce the number of Site mobilizations and allow time to receive results prior to the soil boring and monitoring well installation activities.

Soil Boring Installation and Sampling Procedures

Prior to advancement, each location will be pre-cleared to five ft bls using non-intrusive methods such as hand tools and vacuum excavation, to verify the absence of utilities and/or other subsurface features. Should a utility or other feature be observed during pre-clearance activities, the proposed location will

be relocated. Each soil boring will be advanced and each monitoring well will be installed by utilizing a GeoProbe® Direct-Push Drill Rig, with auger capabilities.

Soil borings at the formerly abated dry well and septic structures will be advanced to a minimum depth of 25 ft bls. If evidence of contamination is observed at the deepest interval, drilling will continue until impacts are no longer observed. During soil boring advancement, soil will be collected continuously, lithology will be recorded, and soil will be inspected for evidence (visual or olfactory) of contamination and field screened continuously for VOCs using a photoionization detector (PID) with a 10.6 eV lamp. Where soil sampling is proposed, each soil sample for laboratory analysis will be collected in accordance with the procedures outlined in the June 14, 2018 RIWP and will be analyzed for full suite Part 375 parameters plus ECs. Soil samples will be collected from the suspected invert of the former structure (approximately 10 ft bls) or the interval exhibiting the greatest evidence of contamination based on field screening.

Permanent/Temporary Monitoring Well Installation and Groundwater Sampling Procedures

Following the advancement of the groundwater profile borings, permanent monitoring wells will be installed. Each permanent monitoring well will be installed and constructed of 2-inch diameter, Schedule 40 polyvinyl chloride (PVC) casing and 0.020-inch slot, machined screen to the depths as determined following receipt of the groundwater profile boring results. The newly installed monitoring wells will be developed and sampled for VOCs only in accordance with the procedures outlined in the June 14, 2018 RIWP.

A temporary monitoring well, with 10-foot well screen, will be installed in the borings proposed at each of the formerly abated septic structure locations. The screen interval will be set and the groundwater samples will be collected from the suspected invert of the former structure (approximately 10 ft bls) or the interval exhibiting the greatest evidence of contamination based on field screening. The temporary monitoring wells will be constructed of 1-inch diameter, Schedule 40 PVC casing and 0.020-inch slot, machined screen. Each temporary monitoring well will be purged prior to sample collection to remove the standing water in each well. The groundwater grab samples will be collected in accordance with the sampling procedures outlined in the June 14, 2018 RIWP and analyzed for full suite Part 375 parameters plus ECs. Once each groundwater grab sample is collected, the temporary monitoring wells will be removed, and the boreholes will be backfilled with cement-bentonite grout to surface.

**Off-Site 2025 SRI Activities**

Access will be requested from all property owners where investigation work is proposed, as described further below. Once all data from the on-Site 2025 SRI sampling is received, Roux will determine if any of the proposed off-Site locations or sample/screened-interval depths for the off-Site 2025 SRI need to be modified. The proposed locations for the 2025 SRI are shown on Figure 2.

As requested in the May 7, 2024 and August 1, 2025 comment letters, the proposed scope of the off-Site 2025 SRI will be as follows:

| Location | Scope | Depth (ft bls) | Analyses | Rationale |
|---|---|---|---|---|
| Off-Site Monitoring Well | Installation, development, and sampling of one monitoring well, 14MA-MW-1, located off-Site and downgradient of MW-3. Installation will depend on the property owner granting access. | *3-18<br>*Screened interval will be confirmed following on-Site 2025 SRI activities. | VOCs | To determine off-Site groundwater quality downgradient of MW-3. Location will be based on access. |

| Location | Scope | Depth (ft bls) | Analyses | Rationale |
|---|---|---|---|---|
| | Contingent locations: 16MA-MW-1, 22MA-MW-1 or HP-MW-1 | *3-18 | | Off-Site contingent locations if access is denied. |
| Off-Site Soil Vapor Intrusion (SVI) evaluation | Completion of SVI evaluation at the off-Site, downgradient residences located at 14 (14MA-SSV-1/14MA-IA-1), 16 (16MA-SSV-1/16MA-IA-1) and 22 (22MA-SSV-1/22MA-IA-1) Mowbray Avenue. Installation will depend on the property owners granting access. One off-Site outdoor ambient air sample (OOAA-1) will be collected during the SVI Evaluation. | Sub-slab samples will be immediately below the slab. Indoor air and outdoor ambient air samples will be from the breathing zone. (24 hour samples) | VOCs (TO-15) | Evaluate current SVI conditions at downgradient properties, pending access. |
| | If interior access is denied at any/all three residences, install and sample contingent exterior soil vapor samples (14MA-SV-1, 16MA-SV-1 or 22MA-SV-1). | Contingent soil vapor only. (Two hour samples) | | Off-Site contingent soil vapor. |
| | If access is denied at all three residences, location HP-SV-1 for soil vapor only. | Contingent soil vapor only. (Two hour samples) | | Off-Site contingent location if access is denied. |

Off-Site Access Request

Access to the residences located at 14, 16, and 22 Mowbray Avenue will be requested for the installation of one groundwater monitoring well and to conduct an SVI evaluation (sampling of indoor air, sub-slab soil vapor and ambient air). Copies of Off-Site access request letters will be provided to NYSDEC and NYSDOH. Access to 14 Mowbray Avenue has been previously denied; however, access will be requested again as well as from the residences further downgradient (16 Mowbray Avenue and 22 Mowbray Avenue). Roux will notify NYSDEC and NYSDOH if access is denied at any of the residences. It is possible that a property owner may allow access to the back yard for monitoring well installation or soil vapor sample installation but may not allow access to the interior spaces for the SVI evaluation, or vice versa. As such, the off-Site access request letters will be worded to provide the owners with options:

- To allow access to the back yard for groundwater monitoring well installation and sampling;
- To allow access to the back yard for soil vapor point installation and sampling (if full SVI is not allowed);
- To allow access to the back yard for outdoor ambient air sampling; and/or
- To allow access for interior sub-slab soil vapor pin installation and sampling and indoor air sampling.

Off-Site Monitoring Well

Pending off-Site access, one off-Site monitoring well is proposed. The primary proposed monitoring well location is the 14 Mowbray Avenue residence. The three contingent monitoring well locations, one at 16 Mowbray Avenue (16MA-MW-1), one at 22 Mowbray Avenue (22MA-MW-1) and one in the public roadway near the intersection of Mowbray Place and Homan Place (HP-MW-1), as shown on Figure 2,

are proposed in the event access is denied at 14 Mowbray Avenue. The monitoring well is anticipated to be installed bridging the water table (3-18 ft bls); however, the screened interval will be evaluated and adjusted, if needed, following completion of the on-Site 2025 SRI activities. The monitoring well will be installed, developed, and sampled for VOCs only one week following development, as described above for the on-Site monitoring wells.

Off-Site SVI Evaluation

Pending off-Site access, the SVI evaluation proposed will include the sampling of indoor air, sub-slab soil vapor and representative off-Site ambient air during the heating season (November 1st – March 31st). The sub-slab soil vapor points will be installed directly beneath the foundation slab utilizing a hammer drill. SVI samples will be collected over a 24-hour period and a building questionnaire/ product inventory form will be completed for each property where sampling is conducted.

If access is denied to one or more of the interior spaces, but access is allowed to the back yard, a soil vapor sample will be collected from one foot above the water table via a soil vapor point (water table estimated to be between four and five feet bls). If collected, the soil vapor sample would be labeled 14MA-SV-1, 16MA-SV-1 or 22MA-SV-1 and will be run for a two-hour duration.

If access is denied at all three residences, a contingent soil vapor point (HP-SV-1) will be installed and sampled, adjacent to the contingent monitoring well in the public roadway near the intersection of Mowbray Place and Homan Place, as shown on Figure 2. The off-Site SVI Evaluation will be performed in accordance with the NYSDOH Guidance for Evaluating Soil Vapor Intrusion in the State of New York (2006 and subsequent updates) as well as the procedures outlined in the June 14, 2018 RIWP.

Investigation Derived Waste

Soil cuttings, development water, and purge water from on-Site and off-Site locations will be containerized in labeled 55-gallon drums and will be staged in a designated area on-Site pending proper disposal. IDW will be sampled for waste characterization and will be disposed of off-site at a permitted waste disposal facility in accordance with the results of the waste characterization sampling. A Contained-in request will be submitted to NYSDEC, if appropriate.

Community Air Monitoring

Roux will implement the Community Air Monitoring Program (CAMP) during any intrusive subsurface activities to conduct monitoring and protection for potential offsite receptors. The CAMP scope of work will include the use of one downwind air monitoring station and one upwind air monitoring station, each equipped with one PID and one particulate meter. Upwind concentrations will be measured at the start of each workday and periodically throughout the day to establish background concentrations. Daily reporting of any exceedances will be provided to the NYSDEC and NYSDOH. CAMP data results will be provided with the daily field activity reports and also in the final letter report along with locations of monitoring stations, monitoring equipment, procedures, and contaminant action levels. The NYSDOH Generic CAMP and Special Requirements for Work Within 20 Feet of Potentially Exposed Individuals or Structures is included as Attachment 1 and Special Requirements will be implemented as necessary.

**Reporting and Schedule**

Roux will provide the results of the 2025 SRI to the NYSDEC in a letter report that will be an amendment to the RIR. The data collected during the 2025 SRI will also be included as part of a revised RAWP. The analytical results will be produced in accordance with NYSDEC Analytical Services Protocols (ASP) Category B deliverables and will be reviewed and validated by an independent party in a data usability summary report (DUSR). All data generated will be submitted to the NYSDEC database.

Roux is prepared to begin implementation of the proposed Scope of Work within 30 days of NYSDEC's approval of this 2025 SRIWP.

If you have any questions or need additional information, please do not hesitate to contact the undersigned at (631) 232-2600.

Sincerely,

**ROUX ENVIRONMENTAL ENGINEERING AND GEOLOGY, D.P.C.**

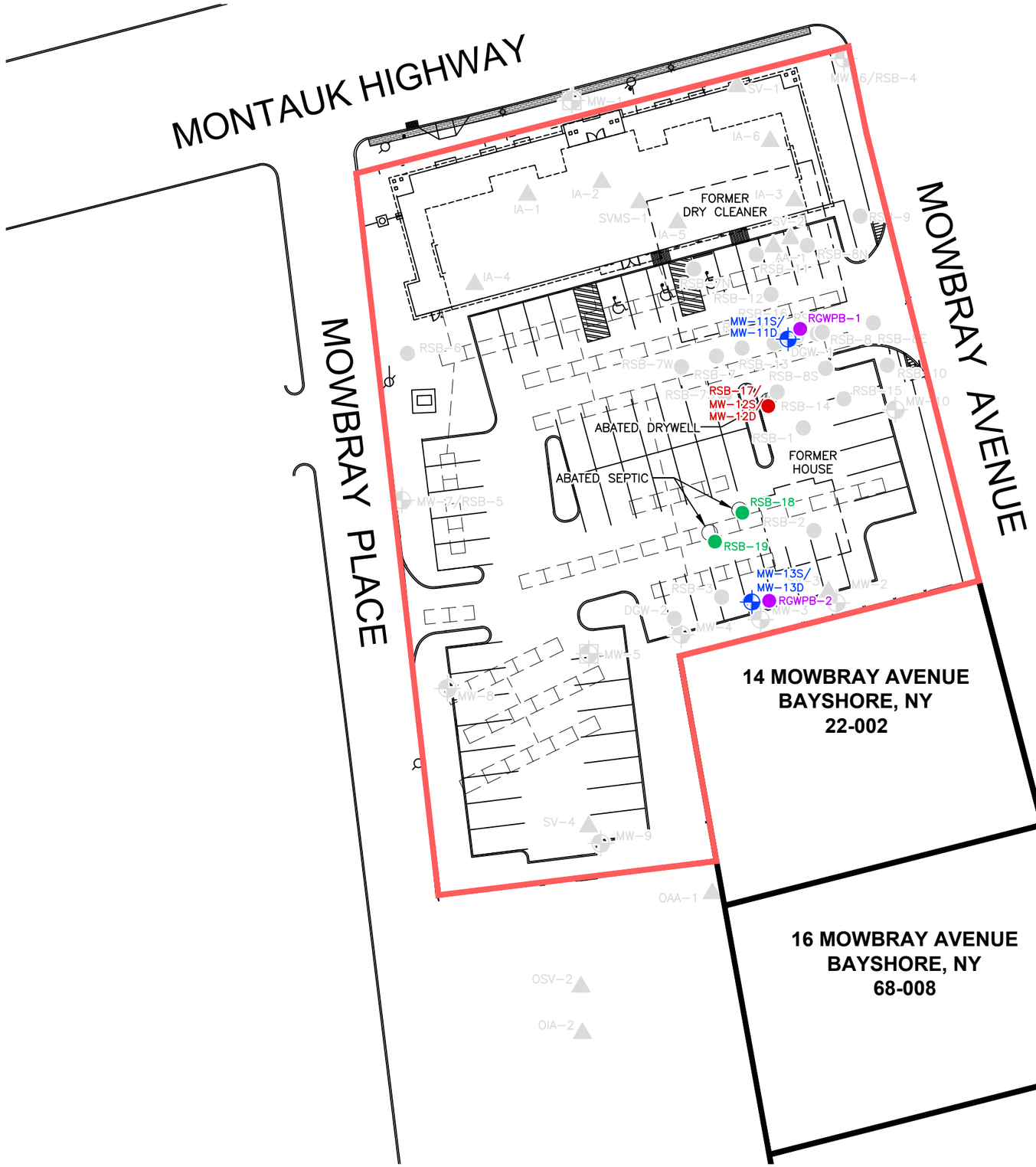
Noelle Clarke, P.E.
Principal Engineer

Attachments

cc: Peter O'Hara, 250 East Main Street, LLC
Barry Cohen, Certilman Balin Adler & Hymen, LLP
Girish Desai, NYSDEC
Joseph Duminuco, Roux
Sarah Stern, Roux

# FIGURES

1. Site Plan with 2025 SRIWP Sample Location
2. 2025 SRIWP Off-Site Sample Locations




LEGEND

- BCP SITE BOUNDARY
- SITE DRAINAGE
- ABATED DRYWELL
- ABATED SEPTIC
- MW-11S/ MW-11D — PROPOSED SHALLOW AND DEEP MONITORING WELL LOCATION
- RSB-17/ MW-12S/ MW-12D — PROPOSED SOIL BORING, SHALLOW AND DEEP MONITORING WELL LOCATION
- RSB-18 — PROPOSED SOIL BORING AND GROUNDWATER GRAB SAMPLE LOCATION
- RGWPB-1 — PROPOSED GROUNDWATER PROFILE BORING LOCATION
- DGW-1 — DEEP GROUNDWATER INVESTIGATION SAMPLE LOCATION
- RSB-1 — SOIL SAMPLE LOCATION (VOCs ONLY)
- RSB-8 — SOIL SAMPLE LOCATION (FULL SUITE ANALYSIS)
- RSB-8E — SOIL AND GROUNDWATER SAMPLE LOCATION
- RSB-16 — VERTICAL GROUNDWATER DELINEATION SOIL BORING AND SAMPLE LOCATION
- MW-2 — EXISTING MONITORING WELL LOCATION INSTALLED BY OTHERS
- MW-1 — FORMER MONITORING WELL LOCATION INSTALLED AND REMOVED BY OTHERS
- MW-8 — MONITORING WELL LOCATION (NO SOIL SAMPLING)
- MW-6/ RSB-4 — MONITORING WELL LOCATION WITH DOCUMENTATION SOIL SAMPLES (SHALLOW AND ABOVE THE WATER TABLE)
- IA-1 / OIA-2 — INDOOR AIR SAMPLE LOCATION
- SVMS-1 — SOIL VAPOR MITIGATION SYSTEM SAMPLE LOCATION
- SV-1 / OSV-2 — SOIL VAPOR SAMPLE LOCATION
- AA-1 / OAA-1 — AMBIENT AIR SAMPLE LOCATION

40’ 0 40’

N

Title:
# SITE PLAN WITH 2025 SRIWP SAMPLE LOCATION

250 EAST MAIN STREET, BAY SHORE, NEW YORK

Prepared For:
250 EAST MAIN STREET, LLC

ROUX

| | | |
|---|---|---|
| Compiled by: R.L. | Date: 27FEB25 | FIGURE 1 |
| Prepared by: G.M. | Scale: AS SHOWN | |
| Project Mgr: R.L. | Project: 2874.0001Y000 | |
| File: 2874.0001Y153.01.DWG | | |

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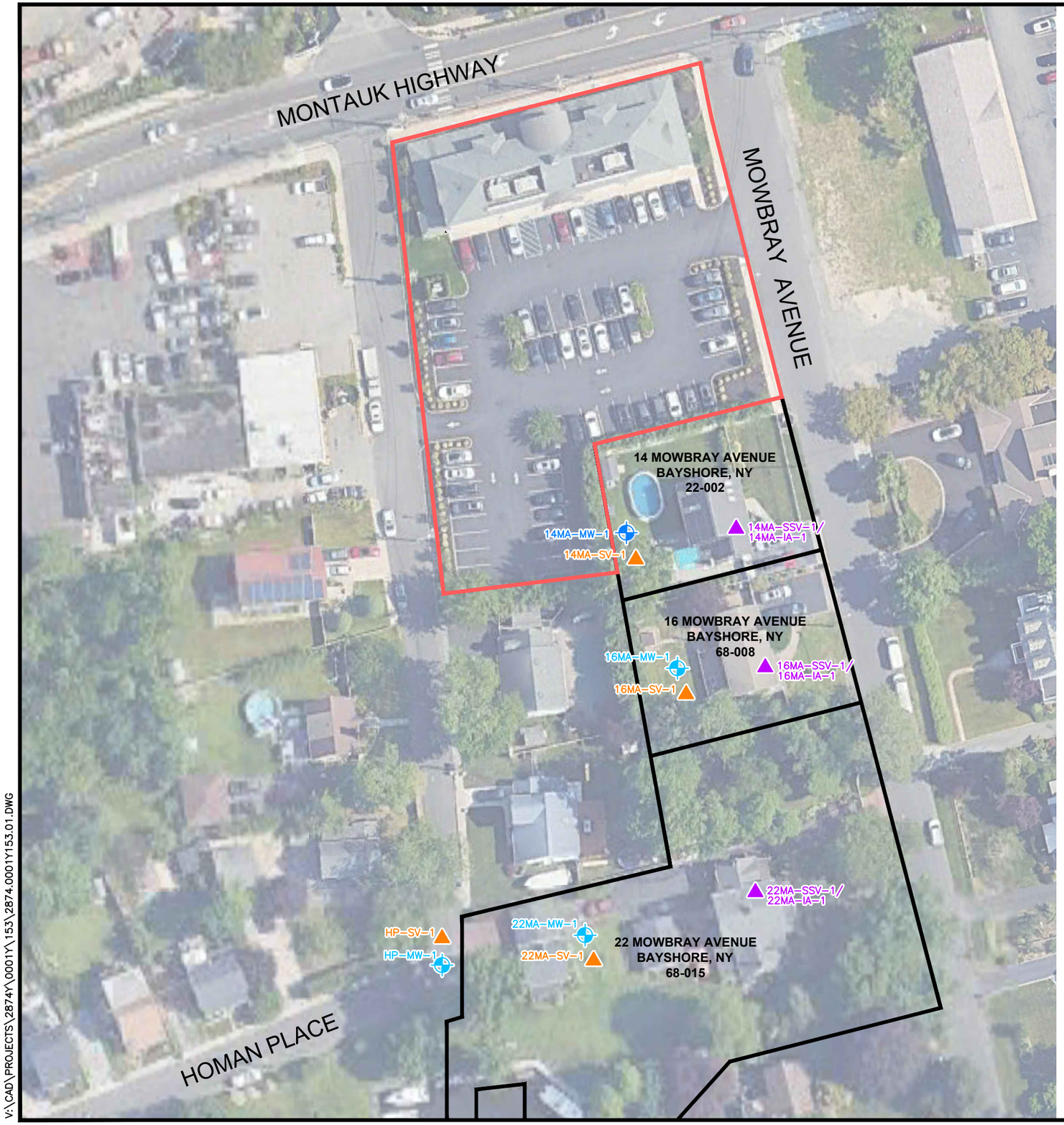


LEGEND

- BCP SITE BOUNDARY
- SURROUNDING PROPERIES
- 14MA-SSV-1/ 14MA-IA-1 — PROPOSED OFF-SITE SOIL VAPOR INTRUSION EVALUATION SAMPLE LOCATION (SUB-SLAB SOIL VAPOR AND INDOOR AIR)
- HP-SV-1 — PROPOSED OFF-SITE CONTINGENCY SOIL VAPOR SAMPLE LOCATION
- 14MA-MW-1 — PROPOSED OFF-SITE MONITORING WELL LOCATION
- 16MA-MW-1 — PROPOSED OFF-SITE CONTINGENCY MONITORING WELL

KEY

**14 MOWBRAY AVENUE** ← ADDRESS
**BAYSHORE, NY** ← CITY, STATE
**22-002** ← LOT

NOTE

1. ONE OFF-SITE OUTDOOR AMBIENT AIR SAMPLE (OOAA-1) WILL BE COLLECTED DURING THE OFF-SITE SVI SAMPLING.
2. IF ACCESS TO INTERIOR SPACES IS DENIED FOR FULL SVI SAMPLING, BUT ACCESS IS ALLOWED TO THE BACK YARD, A SOIL VAPOR SAMPLE WILL BE COLLECTED. IF COLLECTED, SOIL VAPOR SAMPLE DESIGNATIONS WILL BE 14MA-SV-1, 16MA-SV-1 RO 22MA-SV-1)

40' 0 40'

N

Title:
**2025 SRIWP OFF-SITE SAMPLE LOCATIONS**

250 EAST MAIN STREET, BAY SHORE, NEW YORK

Prepared For:
250 EAST MAIN STREET, LLC

ROUX

| | |
|---|---|
| Compiled by: R.L. | Date: 27FEB25 |
| Prepared by: G.M. | Scale: AS SHOWN |
| Project Mgr: R.L. | Project: 2874.0001Y000 |
| File: 2874.0001Y153.01.DWG | |

FIGURE 2

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# ATTACHMENT 1

New York State Department of Health (NYSDOH)
Generic Community Air Monitoring Plan (CAMP)

## New York State Department of Health (NYSDOH)
## Generic Community Air Monitoring Plan (CAMP)

### 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., offsite receptors including residences and businesses and onsite 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 offsite 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**

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.