Community Air Monitoring Plan

600-800 Food Center Drive

Introduction

The purpose of the Community Air Monitoring Plan (CAMP) is to provide a measure of protection for the downwind community (i.e., off-site receptors including residences and businesses and on-site workers not directly involved with the subject work activities) from potential airborne releases as a direct result of ground-intrusive pavement repair work. Work is being performed at two Sites (600 Food Center Drive (600 FCD) and 800 Food Center Drive (800 FCD)). 600 FCD is in the Brownfield Cleanup Program and 800 FCD is a closed Site in the former Voluntary Cleanup Program.

During all pavement grinding activities at the Site, continuous real-time air monitoring for particulates will be performed in the work zone.

All air monitoring equipment will be maintained, calibrated and field checked in accordance with the manufacturer's recommendations. Air monitoring reports shall be submitted to the Department while ground intrusive activities are performed at the site.

Response Levels, and Actions

All necessary means will be employed by the contractor to prevent and control on- and off-site odor nuisances. At a minimum, procedures will include limiting the area of open pavement. Implementation of all odor controls, including halt of work, will be the responsibility of the contractor.

Particulate Monitoring, Response Levels, and Actions

If nuisance dust emissions are identified, work will be halted and the source of dust will be identified and corrected. Work will not resume until nuisance dust emissions have been abated. Dust management during invasive on-site work will be the responsibility of the contractor and will include, at a minimum:

- Use of a dedicated water spray methodology for roads, asphalt or concrete disturbance, excavation areas and stockpiles, as necessary;
- Use of properly anchored tarps to cover stockpiles;
- Exercise extra care during dry and high-wind periods; and

The action level for dust is based on the *Particulate Monitoring, Response Levels, and Actions* section of the New York State Department of Health (NYSDOH) Generic Community Air

Monitoring Plan (Appendix 1A of DER-10). The field notebook or other suitable log book should be used to describe the location of the dust monitor relative to the dust generating activities as well as wind direction.

Particulate concentrations will be monitored continuously at the work zone which will be each area of pavement repair. Particulate monitoring will be performed using a dust meter, with real-time monitoring capabilities 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. Background readings will be collected throughout the day. The equipment will be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration will be visually assessed during all work activities.

1. If the downwind PM-10 particulate level is 100 micrograms per cubic meter ($\mu g/m^3$) 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 $\mu g/m^3$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 $\mu g/m^3$ 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 $\mu g/m^3$ of the upwind level and in preventing visible dust migration.

3. All confirmed exceedances will be reported to NYSDEC within 24-hours (i.e., only exceedances directly related to on-site activities will be reported).

4. All 15-minute readings will be recorded and be available for State (NYSDEC and NYSDOH) and County Health personnel to review.

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 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 particulate concentrations opposite the walls of occupied structures or next to intake vents exceed 150 $\mu g/m^3$, work activities should be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150 $\mu g/m^3$ or less at the monitoring point.

- Depending upon the nature of contamination and intrusive activities, other parameters (e.g., explosivity, oxygen, hydrogen sulfide, carbon monoxide) may also need to be monitored. Response levels and actions are provided in Table 6 of the HASP.