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# COMMUNITY AIR MONITORING PLAN

for

**C Block  
Brooklyn, New York  
NYSDEC BCP Site No. C224435**

*Prepared For*

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## 1.0 Introduction

This site-specific community air monitoring plan (CAMP) was prepared in general compliance with the New York State Department of Health (NYSDOH) Generic CAMP and is intended to mitigate potential exposures of sensitive receptors to nuisance odors and dust resulting from ground-intrusive work. This CAMP is intended for use during implementation of the Remedial Action Work Plan (RAWP), which includes but is not limited to, soil/fill excavation and handling and utility trenching. Investigations carried out prior to the start of RAWP implementation (e.g. waste characterization) may be implemented with modifications to this CAMP (pending approval from the New York State Department of Environmental Conservation [NYSDEC] and the NYSDOH). Investigation activities completed in accordance with separate work plans may have modified CAMP procedures that are not covered herein.

## 2.0 Community Air Monitoring

Monitoring for particulates and odors will be conducted during ground-intrusive work by a Langan field representative under the supervision of the remedial engineer (RE). The CAMP will include real-time monitoring for volatile organic compounds (VOCs) and particulates at the downwind perimeter of each designated work area when ground-intrusive work is in progress. Continuous monitoring will be required for all ground-intrusive work. Ground-intrusive work includes, but is not limited to, the excavation, handling, backfilling, stockpiling, and/or grading of soil/fill for remediation and construction activities, including utility trenching. The work zone is defined as the general area where machinery is operating in support of remediation and construction activities. A portable photoionization detector (PID) will be used to monitor the work zone and for periodic monitoring of total VOC levels during work such as soil sampling. The site perimeter will be visually monitored for fugitive dust emissions.

The following actions will be taken based on VOC levels measured:

- If total VOC levels exceed 5 parts per million (ppm) above background for the 15-minute average at the perimeter, work activities will be temporarily halted and monitoring continued. If levels readily decrease (per instantaneous readings) below 5 ppm above background, work activities will resume with continued monitoring.
- If total VOC levels at the downwind perimeter of the work zone persist at levels in excess of 5 ppm above background but less than 25 ppm, work will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work will resume provided that the total VOC level 200 feet downwind of the hot 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 above background for the 15-minute average.
- If the total VOC level is above 25 ppm at the perimeter of the hot zone, work will be shut down.

The following actions will be taken based on instrumentation measurements:

- If the downwind particulate level is 100 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression must be employed. Work may continue with dust suppression techniques provided that downwind PM10 levels do not exceed  $150 \mu\text{g}/\text{m}^3$  above the background level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM10 levels are greater than  $150 \mu\text{g}/\text{m}^3$  above the background 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 PM10 concentration to within  $150 \mu\text{g}/\text{m}^3$  of the upwind level and in preventing visible dust migration.

### **3.0 Odor, Vapor, and Dust Suppression Techniques**

Preventative measures for dust generation may include wetting site fill and soil, construction of an engineered construction entrance with gravel pad, use of a truck wash area, covering soils with tarps, and limiting vehicle speeds to five miles per hour.

Work practices to minimize odors and vapors include minimizing open storage of contaminated-source soil and handling of contaminated material. Offending odor and organic vapor controls may include the application of foam suppressants, or placing polyethylene sheeting or non-odorous soil over the odor or VOC source areas for short-term control of the odor and VOCs.

If odors develop and cannot otherwise be controlled, additional means to eliminate odor nuisances will include: direct load-out of soils to trucks for off-site disposal; use of chemical odorants in spray or misting systems; and, use of staff to monitor odors in surrounding neighborhoods.

### **4.0 Monitoring of Nearby Occupied Structures**

This section applies where structures within about 20 feet of the ground-intrusive work may be occupied during the planned remedial action. Where this condition exists, the following will be considered for incorporation into the CAMP:

- One of the CAMP monitoring stations will be placed between the remedial work area and nearest outside wall of the occupied structure. If site conditions warrant, a third station may be used to accomplish this task.
  - If 15-minute-average total VOC concentrations exceed 1 ppm above background near the outside wall or next to intake vents of the occupied structure, periodic VOC monitoring will be performed within the occupied structure.
  - If 15-minute-average total PM10 concentrations exceed  $150 \mu\text{g}/\text{m}^3$  above background near the outside wall or next to intake vents of the occupied structure, work activities will be

temporarily suspended until suppression techniques are implemented and concentrations return to background.

- Where nuisances have developed during remedial work and cannot be corrected using the techniques described in Section 3.0, use of additional engineering controls may be considered, such as vapor/dust barriers or ventilation devices.
- Consideration should be given to scheduling or sequencing ground-intrusive activities during periods when potentially exposed populations may not be occupying the structure.

## **5.0 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). Depending upon the nature of contamination, chemical-specific colorimetric tubes of sufficient sensitivity may be necessary for comparing the exposure point concentrations with appropriate pre-determined response levels (response actions should also be pre-determined). 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  $\mu\text{g}/\text{m}^3$ , work activities should be suspended until controls are implemented and are successful in reducing the total particulate concentration to 150  $\mu\text{g}/\text{m}^3$  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.

To satisfy this requirement, an additional fixed downwind monitoring station will be placed along the southern perimeter of the site during ground intrusive work on Lot 16.

## **6.0 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.

## **7.0 Reporting**

A summary of CAMP findings, including triggered action levels, will be provided daily to the NYSDEC and NYSDOH project managers as part of daily reporting. In addition to a summary of CAMP findings, daily reports will include:

- The NYSDEC assigned project number
- An update of progress made during the reporting day including a photograph log
- Locations of work and quantities of material imported and exported from the site
- References to an alpha-numeric map for site activities
- A summary of complaints with relevant details (names, phone numbers)
- A summary of CAMP findings, including exceedances, wind direction, work areas, location of CAMP monitoring stations and other relevant site information (exceedances of the 15-minute time weighted average will be reported to the NYSDEC as soon as they are calculated)
- An explanation of notable site conditions

Daily Reports will include a description of daily activities keyed to an alpha-numeric map for the site that identifies work areas. These reports will include a summary of air sampling results, odor and dust problems and corrective actions, and all complaints received from the public.

Daily reports are not intended to be the mode of communication for notification to the NYSDEC of emergencies (accident, spill), requests for changes to the RAWP, or other sensitive or time critical information; however, such conditions must also be included in the daily reports. Emergency conditions and changes to the RAWP will be addressed directly to NYSDEC Project Manager via personal communication.