COMMUNITY AIR MONITORING PLAN (CAMP)

1.0 INTRODUCTION

In accordance with the New York State Department of Environmental Conservation (NYSDEC) Site Management Plan requirements, this Community Air Monitoring Plan (CAMP) describes the procedures for real-time air monitoring which will be completed during significant soil disturbance activities (i.e., soil excavation) at the Site.

Prior investigations completed at the Site revealed the constituents of concern in soil are metals and semi-volatile organic compounds. Since volatile organic compounds (VOCs) were not detected in soil at concentrations above the regulatory criteria, air monitoring for VOCs is not included in this CAMP. This CAMP was generally developed based on the requirements of New York State Department of Health (NYSDOH) Generic CAMP, Appendix 1A of NYSDEC DER-10 Technical Guidance for Site Investigation and Remediation May 2010.

2.0 PURPOSE

The CAMP requires real-time monitoring for particulates (i.e., dust) at the downwind perimeter of the work area at the Site. 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 (e.g., off-site receptors including businesses and on-site workers not directly involved with the subject work activities) from potential airborne contaminant releases as a direct result of significant soil disturbance activities. If the action levels specified herein are exceeded; increased monitoring, corrective actions to abate emissions, and/or work shutdown will be required. Additionally, the CAMP helps to confirm that work activities do not spread contamination off-site through the air. As noted above, the CAMP will be performed during significant soil disturbance activities (i.e., excavation and soil loadout) with the potential to generate fugitive dust emissions. CAMP will also be performed during the initial two (2) days

of a minimally intrusive work activity which does not include significant soil disturbance activities (e.g., installation of sheeting, pile driving, pouring concrete, etc.) to evaluate if measured fugitive dust emissions are of concern. Following the performance of the initial monitoring during minimally intrusive activities, the results will be evaluated. If the results indicate the performance of CAMP is no longer warranted, the volunteer will petition the NYSDEC for approval to cease performance of CAMP for these activities.

Additionally, since this CAMP includes monitoring for particulates only, the CAMP will not be implemented during excavation completed below the water table since the potential for fugitive dust emissions is unlikely for wet soils.

3.0 AIR MONITORING PROTOCOL

A qualified environmental monitor with "stop work authority" will be responsible for the air monitoring and daily calibration and maintenance of the equipment in accordance with the manufacturer's specifications. All instrumentation and equipment will be maintained in proper operating condition. The qualified environmental monitor will be responsible for documenting in the dedicated project log book each calibration event, any equipment and instrument malfunctions, unusual conditions, air monitoring station locations, and any exceedances of action levels and countermeasures implemented.

3.1 Particulate Monitoring, Response Levels, and Actions

Particulate concentrations will be monitored continuously at the upwind and downwind locations of the perimeter of the Site at temporary particulate monitoring stations. The particulate monitoring will be performed using real-time monitoring equipment (i.e., TSI DustTrak Model 8530) 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 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.

If the downwind PM-10 particulate level is 100 micrograms per cubic meter (µg/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 will be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 µg/m^3 above the upwind level and provided that no visible dust is migrating from the work area. Dust complaints from any owner of an adjacent or nearby property will be managed by the Contractor in a manner equivalent to an exceedance of an action level in the CAMP.

If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 µg/m3 above the upwind level, work will be stopped and a re-evaluation of activities will be initiated. Work will be able to be resumed provided that dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 µg/m^3 of the upwind level and in preventing visible dust migration.

4.0 REPORTING

At the completion of each work day, the data recorded from each air monitoring station will be downloaded onto a dedicated field computer and evaluated by the qualified environmental monitor. All readings will be recorded and be available for State (NYSDEC and NYSDOH) personnel to review.

Any exceedance of a CAMP threshold or action level will be reported to NYSDEC and NYSDOH Project Managers in the daily report. The instrument readings; location of the monitoring station where the exceedance was recorded; readings at upwind locations; date, time,

and duration of elevated readings (i.e., number of 15 minute time-weighted exceedances); activities being performed at the time of the exceedances; and descriptions of countermeasures implemented to control the exceedance and prevent future occurrences will be recorded.