
COMMUNITY AIR MONITORING PLAN

BAUSCH AND LOMB SUNTRU STREET SITE

Prepared For:

BAUSCH + LOMB

HELPING
PEOPLE
SEE BETTER
TO LIVE BETTER



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LIST OF ACRONYMS

<u>ACRONYM</u>	<u>Definition</u>
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CAMP	Community Air Monitoring Plan
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
PM ₁₀	particulate matter less than 10 micrometers in diameter
ppm	parts per million
TVOCs	total volatile organic compounds
VOC	volatile organic compound

1.0 INTRODUCTION AND BACKGROUND

1.1 Overview

This Community Air Monitoring Plan (CAMP) has been adapted from the New York State Department of Health (NYSDOH) generic CAMP found in DER 10 (NYSDEC 2010) to support the implementation of investigative activities at the Bausch and Lomb Suntru Street Site (the Site).

This CAMP describes the monitoring activities that will be performed during completion of pre-design investigation activities and was developed in accordance with New York State Department of Environmental Conservation's (NYSDEC) DER 10 guidance (NYSDEC 2010).

A 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., off-site receptors including residences and businesses and on-site 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 off-site through the air.

Specific activities related to monitoring for VOCs are described in Section 2 of this CAMP. Requirements for particulate monitoring are presented in Section 3. Reliance on the CAMP should not preclude simple, common-sense measures to keep VOCs, dust, and odors at a minimum around the work areas.

1.2 Community Air Monitoring Plan

Air monitoring will be conducted on a continuous basis during all dust-generating and/or intrusive work.

"Dust-generating work" means any work with the potential to generate dust. Examples of dust-generating work include, but are not limited to, the following:

- Handling removed material and fill material
- Intrusive work

"Intrusive work" means any work performed below the existing level of the ground surface, or that involves the disturbance of existing earth, regardless of quantity. Examples of ground-intrusive work include, but are not limited to, the following:

- Clearing/grubbing
- Site preparation activities
- Installation of soil borings

Community air monitoring will include real-time monitoring for total volatile organic compounds (TVOCs) and particulate matter less than 10 micrometers in diameter (PM₁₀), and periodic monitoring for odors. The consultant will employ a technician to perform the monitoring work.

Air monitoring stations will be deployed at the start of each workday before any ground-intrusive or dust-generating work is initiated. At a minimum, one air monitoring station will be positioned at the upwind perimeter of the Site and two air monitoring stations will be positioned at the downwind perimeter of the Site (three air

monitoring stations total). Upwind and downwind air monitoring stations will be determined based on predominant wind direction, and the nature and location of work to be performed on a given day. As needed or required, additional station(s) will be positioned in the immediate vicinity of excavation/work areas to perform localized air monitoring. Wind direction will be monitored through the day, and locations of air monitoring stations will be adjusted if the wind direction shifts more than 60 degrees from the original upwind direction.

Air monitoring equipment will be calibrated on a daily basis, or other frequency recommended by the manufacturer. All instrument readings, field reference checks, and calibrations will be documented in a dedicated log. During the workday, periodic field checks of monitoring equipment to verify proper function will be performed. The date, day, time, and outcome of each field check will be documented in a dedicated log.

Daily reports and exceedance reports will be submitted in an electronic format to the Owner, NYSDEC, and NYSDOH representatives listed in Table 1.

TABLE 1 CAMP CONTACT LIST

Name	Affiliation	Contact Information
DEC Remediation Manager	NYSDEC	TBD
DEC DOH Lead	NYSDOH	TBD
Amy Butler	Bausch and Lomb (Owner)	Office: (585) 338-5699 Mobile: (585) 766-4667 Amy.butler@bausch.com

2.0 VOC MONITORING RESPONSE LEVELS AND ACTIONS

Monitoring for TVOCs will be conducted 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 must be equipped with an audible alarm to indicate exceedance of the action level. The equipment will be capable of calculating 15-minute TWA concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of TVOCs at one or more downwind air monitoring station(s) exceeds 2.5 parts per million (ppm) above background (upwind) for the 15-minute average, this will serve as an early warning “alert level.” If the alert level is exceeded, the CAMP technician will notify the Contractor, who will identify potential sources of the exceedance, employ additional vapor controls while continuing work, and if necessary and appropriate, evaluate and modify construction techniques.
2. If the ambient air concentration of TVOCs at one or more downwind air monitoring station(s) exceeds 5 ppm above background (upwind) for the 15-minute average, this shall serve as an “action level,” and work activities must be temporarily halted and monitoring continued. If the TVOCs level readily decreases (per instantaneous readings) below 5 ppm over background, work activities can resume with continued monitoring. If TVOCs levels at the downwind perimeter of the work area persist at levels in excess of 5 ppm over background but less than 25 ppm, work activities must be halted, the Owner and NYSDEC project manager must be notified, the source of vapors identified, corrective actions taken to abate emissions, including modifying work techniques if necessary and appropriate, and monitoring continued. After these steps, work activities can resume provided that TVOCs levels have fallen below the action level.
3. If the organic vapor level is above 25 ppm at the perimeter of the work area, activities must be shut down, and work shall not resume until authorized by the Owner. All of the above steps detailed for an exceedance of 5 ppm must be taken.
4. All 15-minute readings must be recorded and be available for State (NYSDEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

3.0 PARTICULATE MONITORING RESPONSE LEVELS AND ACTIONS

Monitoring for particulate matter will be conducted using real-time monitoring equipment capable of measuring PM₁₀. 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. The equipment will be capable of calculating 15-minute TWA concentrations, which will be compared to the levels specified below.

1. If the ambient air concentration of PM₁₀ at one or more downwind air monitoring station(s) exceeds 100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) above background (upwind) for the 15-minute average, or if visible dust is observed leaving the work area, this will serve as an early warning “alert level.” If the alert level is exceeded, the CAMP technician will notify the Contractor, who will identify potential sources of the exceedance, employ additional dust controls while continuing work, and if necessary and appropriate, evaluate and modify work techniques.
2. If the ambient air concentration of PM₁₀ at one or more downwind air monitoring station(s) exceeds 150 $\mu\text{g}/\text{m}^3$ above background (upwind) for the 15-minute average, this shall serve as an “action level”, and work activities must be temporarily halted and monitoring continued. If the PM₁₀ level readily decreases (per instantaneous readings) below 150 $\mu\text{g}/\text{m}^3$ over background, work activities can resume with continued monitoring. If PM₁₀ levels at the downwind perimeter of the work area persist at levels in excess of 150 $\mu\text{g}/\text{m}^3$ over background, work activities must be halted, the Owner and NYSDEC project manager must be notified, the source of dust identified, corrective actions taken to abate emissions, including modifying work techniques if necessary and appropriate, and monitoring continued. After these steps, work activities can resume provided that PM₁₀ levels have fallen below the action level.
3. All 15-minute readings must be recorded and be available for State (NYSDEC and NYSDOH) personnel to review. Instantaneous readings, if any, used for decision purposes should also be recorded.

4.0 REFERENCES

NYSDEC. 2010. DER-10 Technical Guidance for Site Investigation and Remediation. May 3.

