Community Air Monitoring Plan for Remedial Action at the Former Geneva Foundry Site Geneva, New York

Site Number C835027A

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Prepared for:

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Introduction

The Community Air Monitoring Plan (CAMP) for this site requires real-time monitoring for particulates (i.e., dust) at the upwind and downwind perimeters and adjacent to the nearest residential structure within the work area when certain activities are in progress at the site. The CAMP is not intended for use in establishing action levels for worker respiratory protection. Rather, its intent is to provide protection for residents within the designated work area and the downwind community (e.g., off-site potential receptors including adjacent and other nearby residences and local pedestrians not involved with the subject work activities) from potential airborne contaminant releases as a direct result of remedial construction activities. The action levels specified herein require monitoring and, when necessary, corrective actions to abate emissions, and/or shutdown work. Additionally, the CAMP helps to confirm that work activities did not spread contamination off-site through the air.

Reliance on the CAMP should not preclude simple, common-sense measures, including visual observations, to keep dust at a minimum around the work areas.

Particulate Monitoring, Response Levels, and Actions

Particulate concentrations shall be monitored continuously with temporary particulate monitoring stations at the upwind and downwind perimeters of the work zone (most often at the property parcel boundary), as well as at the door or window of the on-site residential structure nearest the excavation activities. In addition, upwind and downwind particulate monitoring will occur at the temporary soil staging area whenever contaminated soils are being staged and when the contaminated soil stockpile is not covered.

The particulate monitoring shall be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of determining a 15-minute time-weighted average by integrating over a period of 15 minutes for comparison to the airborne particulate action level. The equipment shall be equipped with a visual and/or audible alarm to indicate exceedance of the action level. In addition, the potential for fugitive dust migration shall be visually assessed during all work activities.

In addition, the following activity requirements apply:

- Dust monitoring (both real time and documentation monitoring) shall be conducted by a minimum of one dedicated person with communication to the project manager, resident engineer, and contractor whenever intrusive activities (such as excavation) are performed.

- Air monitoring equipment will be operated by personnel trained in the use of the specific equipment provided. A log of the location, time, type, and value of each reading will be maintained.

- A written copy of the real time air monitoring results for each work day will be kept and shall include an appropriately scaled map of the work area depicting monitoring locations, wind direction and other appropriate symbols.

- If the downwind or on-site PM-10 particulate level is 100 µg/m^3 greater than background (upwind perimeter location) during any 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 or on-site 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.

- If, after implementation of dust suppression techniques, downwind or on-site PM-10 particulate levels are greater than 150 µg/m^3 above the upwind level, work must be stopped, and work activities must be reevaluated. Work can resume if dust suppression measures and other controls are successful in reducing the downwind or on-site PM-10 particulate concentration to within 150 µg/m^3 of the upwind level and in preventing visible dust migration.

Dust monitoring locations for individual properties will be determined on at least a daily basis and are subject to change throughout the day based on actual field conditions such as wind direction, the location of excavation activities, and the location of the nearest downwind receptor.