

**Community Air Monitoring Plan
Ithaca Gun Property
Demolition
Ithaca, New York**

O'Brien & Gere is pleased to present this Community Air Monitoring Plan (CAMP) for the proposed demolition of the Ithaca Gun Property located at 202 Lake Street in Ithaca, New York. The CAMP has been developed based on the New York State Department of Health (NYSDOH) Generic CAMP document dated January 6, 2000, a New York State Department of Environmental Conservation (NYSDEC) letter dated November 3, 2008 providing a CAMP addendum (attached), and email communications dated November 4, 2008 with Ms. Susan Shearer of NYSDOH and Mr. Reginald Parker of NYSDEC (attached).

Purpose

The purpose of this CAMP is to provide a measure of protection for the community from potential airborne contamination releases as a result of building demolition activities. In addition, a CAMP helps to confirm that work activities did not spread contamination off-site through the air. O'Brien & Gere will conduct the following procedures during site activities.

Sampling Protocol

CAMP requires real-time monitoring for particulate (i.e., dusts) and volatile organic compounds (VOCs) at the downwind perimeter of each designated work area when certain activities are in progress at contaminated sites. The intent of the CAMP is to provide a measure of protection for the downwind community from potential airborne contaminant releases as a direct result of investigative and remedial work activities. For the Ithaca Gun Site, four monitoring stations will be positioned around the intrusive activity work areas, consisting of an upwind and down wind location, and stations on both sides of the work area. As work and weather conditions change, the sample locations will be adjusted to accommodate the site conditions. The attached November 3, 2008 NYSDEC letter addendum provides modifications to the original CAMP document. These modifications are incorporated into the CAMP, with the exception of the lower detection level for lead, which is discussed in the lead section of the CAMP.

Dust

Continuous monitoring for particulate less than 10 micrometers in diameter (PM-10) will be required during building demolition activities, and ground intrusive activities. Air monitoring, alarm set points, 15-minute time weighted averaging action level parameters and visible dust action criteria are identified in the attached addendum.

Lead

Air samples for the detection of lead containing dusts will be collected during site work activities at four sample locations on the perimeter of the work site. The samples will be collected on filters per the

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modified National Institute for Occupational Safety & Health (NIOSH) method 7300 / modified Occupational Safety & Health method 125G. Each sample will collect 2,000 liters of air, which is the maximum volume per the NIOSH sample method. The analytical method will use inductively coupled plasma-mass spectroscopy (ICP-MS) which provides a quantification level of 0.075 µg/sample. Based on a quantification level of 0.075 µg and a maximum sample volume of 2,000 liters, the lowest lead detection level for the NIOSH method is 0.0375 µg/m³, which is below the lead ambient air standard of 0.15 µg/m³.

The NYSDEC addendum recommended a lower lead detection level of 0.015 µg/m³; however, the NIOSH sample method is not capable of achieving this lower detection level. The difference of lead detection levels was discussed with Ms. Shearer of NYSDOH and Mr. Parker of NYSDEC. The result of this discussion was to use the NIOSH method detection level of 0.0375 µg/m³ in place of 0.015 µg/m³ addendum detection level. The attached email provides documentation of the NYSDEC addendum modification.

The samples will be sent by overnight express to an American Industrial Hygiene Association accredited laboratory for rapid (24-hour) sample analysis. Chain of custody documentation will be maintained during sample collection and analysis. The laboratory analysis will report lead levels in time weighted average (TWA) units. Sample results will be provided to NYSDEC and NYSDOH for review and discussion.

Volatile Organic Compounds

Volatile Organic Compounds (VOCs) identified and documented in the Report during the site investigation activities were detected primarily in the groundwater and at low levels. Although VOCs are not anticipated to be an airborne concern during site activities, VOC air monitoring will be conducted in conjunction with the dust monitoring at the four site boundary locations. An RAE Systems MiniRAE 2000 VOC monitor, using photoionization detection, will provide real-time air monitoring data.

The VOC action level will be set at 0.3 parts per million (ppm) above the upwind-detected level. Setting this level is based on (1) the Report identifying the presence of benzene in a ground water sample and (2) the lower detection limit of the VOC monitor. Should the downwind VOC level exceed the background (upwind perimeter) for a 5-minute period, then the VOC source will be identified using a VOC monitor. If the air emissions exceed the VOC Action Level over a 15-minute time period, the VOC source will be covered with clean soil or plastic, and work activities will halt. The condition and cause will be immediately reported to the NYSDEC project manager. Recommendations from the NYSDEC and NYSDOH will be implemented prior to resuming work activities.

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Weather Station

A portable weather station will be set up on the site to record meteorological data per the NYSDEC addendum document.

Documentation/Calibration

All readings from the PM-10, VOC monitors, and the lead filter samples (including calibration data), shall be recorded in a daily activity log book, with a copy of the day's recordings sent to the NYSDEC and NYSDOH via e-mail daily for review. Instantaneous readings, if any, used for decision purposes will also be recorded.

Additionally Required Perimeter Monitoring

O'Brien & Gere shall implement daily perimeter sampling during all work activities. O'Brien & Gere shall provide the personnel, instruments, and materials necessary to perform such air monitoring.