

Mr. Randy Whitcher New York State Department of Environmental Conservation Division of Environmental Remediation, Remedial Bureau C 625 Broadway, 11th Floor Albany, New York 12233-7014

ENVIRONMENT

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Subject:

Proposed Modifications to Community Air Monitoring Program Port Jervis Former MGP Site City of Port Jervis, Orange County, New York Site No. 3-36-049

Dear Mr. Whitcher:

This letter has been prepared on behalf Orange and Rockland Utilities, Inc. (O&R) to request approval from the New York State Department of Environmental Conservation (NYSDEC) to modify the scope of the community air monitoring program for the remaining remedial construction activities to be performed at the Port Jervis former manufactured gas plant (MGP) site. As described in the *Community Air Monitoring Plan* (CAMP; Appendix G of the NYSDEC-approved *Final [100%] Remedial Design Report for Source Area Excavation*), the current community air monitoring program includes 1) real-time air monitoring for volatile organic compounds (VOCs) and particulate matter less than 10 microns in diameter (PM₁₀) and 2) confirmatory air sampling for VOCs and polycyclic aromatic hydrocarbons (PAHs). Real-time air monitoring is performed on a continuous basis (24 hours per day, seven days per week) at four fixed stations located around the perimeter of the site (Figure 1). Confirmatory air samples are collected and analyzed on a weekly basis to verify the results of real-time air monitoring.

By Friday, April 12, 2013, O&R's Remedial Contractor (D.A. Collins Environmental Services, LLC [DAC]) anticipates completing the load-out and off-site disposal of 1) the remaining impacted soils from the Gas Holder A excavation area and 2) the used treatment media from the air handling system for the temporary fabric structure. Thereafter, the remaining project activities will generally include the following:

 Removal and demobilization of the temporary fabric structure and air handling system; Date:

April 5, 2013

Contact:

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Our ref: B0043031

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Mr. Randy Whitcher
April 5, 2013

 Completion of backfilling activities within the upper 6 feet of the Gas Holder A excavation area;

Grading/surface preparation and milling of existing asphalt pavement;

Installation of new asphalt pavement and fencing;

Post-construction surveys/inspections; and

Demobilization of remaining materials, equipment, and personnel.

Given the limited potential to encounter or generate MGP-impacted materials during these activities, O&R proposes the following modifications to the current community air monitoring program effective Monday, April 15, 2013:

Discontinue real-time air monitoring for VOCs;

 Perform real-time air monitoring for PM₁₀ during work hours only (generally 7 am to 5 pm on non-holiday Mondays through Fridays) until all ground-intrusive or dust-generating activities are completed on the project; and

• Discontinue weekly confirmatory air sampling for VOCs and PAHs.

PM₁₀ action levels and monitoring equipment will continue to comply with Appendices 1A and 1B, respectively, of the NYSDEC's *Technical Guidance for Site Investigation and Remediation* (DER-10).

Please contact Mr. Dave Work of O&R at 845.577.3664 with any questions or comments regarding the information provided herein.

Sincerely,

ARCADIS of New York, Inc.

Margaret Carrillo-Sheridan, P.E.

Vice President

Mr. Randy Whitcher April 5, 2013

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Enclosures:

Figure 1, Approximate Locations of Community Air Monitoring Stations

Copies:

Scott Deyette, NYSDEC
James Candiloro, NYSDEC
Jamie Verrigni, NYSDEC
Kristin Kulow, NYSDOH
Dave Work, P.E., O&R
Maribeth McCormick, O&R
Michael Benoit, P.E., ARCADIS
Timothy Olean, CH2M Hill
Tom Shock, GEI



Figure

