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REMOVAL SUPPORT TEAM 3
EPA CONTRACT EP-S2-14-01

December 5, 2018

Mr. Carlos Huertas, On-Scene Coordinator
U.S. Environmental Protection Agency, Region II
Response and Remediation Branch,
Caribbean Environmental Protection Division,
City View Plaza Tower 2, Suite 7000
48 State Road. 165, km 1.2, Guaynabo, Puerto Rico 00968-8069

EPA CONTRACT No.: EP-S2-14-01
TDD No.: TO-0370-0114
DOCUMENT CONTROL No.: RST3-05-F-0036

SUBJECT: FINAL SITE-SPECIFIC COMMUNITY AIR MONITORING PLAN – JJ METAL RECYCLING FACILITY FIRE SITE, CAROLINA, PUERTO RICO

Dear Mr. Huertas,

Enclosed please find the Final Site-Specific Community Air Monitoring Plan (CAMP) for the air monitoring activities to be conducted in support of the Emergency Response at the JJ Metal Recycling Facility Fire Site located in Carolina, Puerto Rico beginning on November 29, 2018. The EPA comments in regards to the previous version of this deliverable (DCN: RST3-05-D-104) have been incorporated. If you have any questions or comments, please do not hesitate to contact me at (787) 602-8424.

Sincerely,

WESTON SOLUTIONS, INC.

Hector Rodriguez
RST 3 Site Project Manager

Enclosure
cc: TDD File No.: TO-0370-0114

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Attachments

1.0 INTRODUCTION

This Site-Specific Community Air Monitoring Plan (CAMP) has been prepared for the emergency response air monitoring activities to be implemented at the JJ Metal Recycling Facility Fire Site (the Site) located in Carolina, Puerto Rico beginning on November 29, 2018.

At approximately 1545 hrs on November 28, 2018, Weston Solutions, Inc., Removal Support Team 3 (RST 3) was activated by the U.S. Environmental Protection Agency, Region II (EPA) On-Scene Coordinator (OSC) to provide emergency response support at the Site. The fire was reported at 1345 hrs on November 28, 2018 at the metal recycling plant located on PR-1, in front of Los Colobos. It is believed that a tank may have exploded at the facility. No other initial information was provided by the EPA.

1.1 Community Air Monitoring Program Objectives

The primary on-site contaminant of concern is metals associated with the on-site metal recycling operations. The air monitoring network is being established around the perimeter of the Site to ensure that no impacts to the surrounding community are encountered as a result of the fire at the facility. In addition to the potential generation of dust as a result of Site activities, there is also the potential for the release of other air borne contaminants into the environment as a result of the fire. The following objectives have been set for the Site air monitoring program:

- Establish a Site-Specific Action Levels for dust.
- Perform continuous 24-hour monitoring for dust particulate concentrations in air to ensure that off-site migration of contaminants remain below the Site-Specific Action Level;
- Periodically monitor ambient air for volatile organic compounds (VOCs) at locations within a ¼ mile and ½ mile radius from the Site to ensure that levels remain below the Site-Specific Action Level; and
- Establish corrective actions to be taken in the event that temporary exceedances of the Site-Specific Action Level are experienced.

This Site-Specific CAMP outlines the air quality monitoring procedures to be followed to protect the surrounding community from potential airborne contaminant releases during the implementation of the emergency response.

2.0 PERIMETER AND COMMUNITY AIR MONITORING

2.1 Air Monitoring Procedures

Air monitoring activities will be conducted in accordance with the procedures outlined within the EPA guidance document entitled, "Superfund Program Representative Sampling Guidance, Volume 2: Air (Short-Term Monitoring), Interim Final. 1995. EPA 540/R-95/140. (OSWER Directive 9360.4-09, PB 96-963206)." Appropriate activities as outlined within this document include the monitoring necessary to ensure that the surrounding community is not exposed to Site-related constituents at concentrations above the Site-Specific Action Level.

Up to four real-time particulate air monitors (*e.g.*, DustTraks or equivalent) equipped with $PM_{2.5}$ (particulate matter smaller than 2.5 microns in diameter) detectors will be used to monitor dust levels throughout the duration of the emergency response (refer to Attachment A, Figure 1: Proposed Monitoring Area Map). The monitors will be operated each workday and will measure $PM_{2.5}$ dust concentrations in real time. The monitors are calibrated by the equipment manufacturer prior to being used at the Site. When the monitors are turned on daily, the instrument is self-calibrating. Once turned on, the monitors record dust concentrations on a 15-minute time-weighted average (TWA). Meteorological data consisting of wind speed, wind direction, temperature, and barometric pressure will be recorded each day to position the monitoring equipment in appropriate upwind and downwind locations. All air monitoring data with time, current activity and the locations of monitoring equipment will be recorded in the on-site files and will be available for review. Meteorological data will be obtained from Weather Underground (http://www.wunderground.com/) and recorded daily in the Site logbook.

Perimeter air monitoring will consist of continuous real-time air quality monitoring and data collection. Monitoring locations will be upwind, at areas of intrusive site activity, and downwind. The monitoring stations will be linked via a Netronics system (a wireless network-based communications system) which will provide instantaneous real-time air quality readings through a computer server. The air monitoring data generated will help to determine if dust suppression activities are effective at maintaining dust levels below the Site-Specific Action Level. Although air monitoring data from each monitoring station is automatically being stored real-time in a computer server, the air monitoring data will be downloaded from each DustTrak unit to a computer or electronic data storage device at the end of each workday.

In addition, a hand-held MultiRAE air monitor equipped with photoionization detectors (PIDs) will be utilized to conduct mobile air monitoring for VOCs, at least once a day at locations within a ¼ mile and ½ mile radius from the Site to determine if VOC levels have exceeded the Site-Specific Action Level. The results from these mobile air monitoring events will be manually recorded in the Site logbook.

Table 2-1: Air Monitoring Specifications

Direct Reading Instrumentation	Monitoring Locations	Monitored Parameters
DustTraks	Perimeter monitoring	Total $PM_{2.5}$ Particulates
MultiRAE Air Monitor	Mobile off-site monitoring	VOCs, LEL, H_2S, O_2, CO

2.2 Basis for Establishing the Air Monitoring Action Level

The community air monitoring program at the Site consists of a combination of perimeter and community monitoring for particulates (dust). The Site-Specific Action Level for $PM_{2.5}$ particulates has been derived based on the EPA National Ambient Air Quality Standards (NAAQS) (150 micrograms per cubic meter [$\mu g/m^3$]). This standard will serve as the Site-Specific Action Level for the duration of the emergency response. See Table 2-2 for the air monitoring Site-Specific Action Levels for particulates at the Site.

The Occupational Safety and Health Administration (OSHA) does not provide a generalized permissible exposure limit (PEL) for VOCs; therefore, a generic Site-Specific Action Level for VOCs of 25 parts per million (ppm) for work zone perimeter as a maximum short-term exposure limit (STEL) of 50 ppm averaged over any 15 minute period will be adopted for the duration of the emergency response. See Table 2-3 for the air monitoring Site-Specific Action Levels for VOCs at the Site.

Table 2-2: Community Air Monitoring Action Level for Particulates (Direct Reading Instrumentation)

Parameter	Monitoring Locations and Interval	Action Level (Above Upwind)	Response Activity
Dust ($PM_{2.5}$)	Perimeter and community monitoring locations with dust readings every 60 seconds, calculate 15-minute average during response activities.	< 100 µg/ m^3	• Continue monitoring.
		≥ 100 µg/m^3	• Continue monitoring. • Begin dust suppression measures. • Notify OSC that early warning alert level has been reached.
	Perimeter and community monitoring locations with dust readings every 60 seconds, calculate 15-minute average during response activities.	≥ 150 µg/m^3	• Cease activities; re-evaluate dust suppression measures.

Table 2-3: Mobile Air Monitoring Action Levels for VOCs (Direct-Reading Instrumentation)

Parameter	Monitoring Location and Interval	Action Levels (Above Background)	Response Activity
VOCs (total by PID)	¼ and ½ mile radius from Site	<5 parts per million (ppm)	• Continue monitoring.
		> 5 ppm, < 25 ppm	• Cease work activities. • Take measures to suppress VOC emissions. • Notify OSC that early warning level has been reached.
		>25 ppm	• Cease activities; re-evaluate VOC suppression measures.

2.3 Non-working Hours

No release of contaminants above background level is anticipated during non-working hours, therefore, no monitoring will be conducted during that time period.

2.4 Equipment Maintenance and Calibration

All air monitoring equipment will be maintained in accordance with applicable manufacturer recommendations. All pertinent data will be logged in a health and safety logbook (or equivalent) and maintained on site for the duration of site activities. All direct-reading instrumentation will be calibrated in accordance with the manufacturer's instructions.

2.5 Engineering Controls

Dust suppression measures, utilizing a water fog, will be the primary engineering control used during all site intrusive activities. All necessary dust suppression measures will be coordinated with the local responding fire department. It will be implemented as necessary to prevent the generation of dust during response activities. Water will be used to wet the surfaces of all areas of the Site. Vapor suppression measures, will be the primary engineering control for VOCs during all site intrusive activities. Vapor suppression will be implemented as necessary to prevent VOC emissions, and may include containing compromised chemical containers and cleaning up spills at the Site.

3.0 REPORTING OF AIR MONITORING RESULTS

3.1 Community Notification Procedures

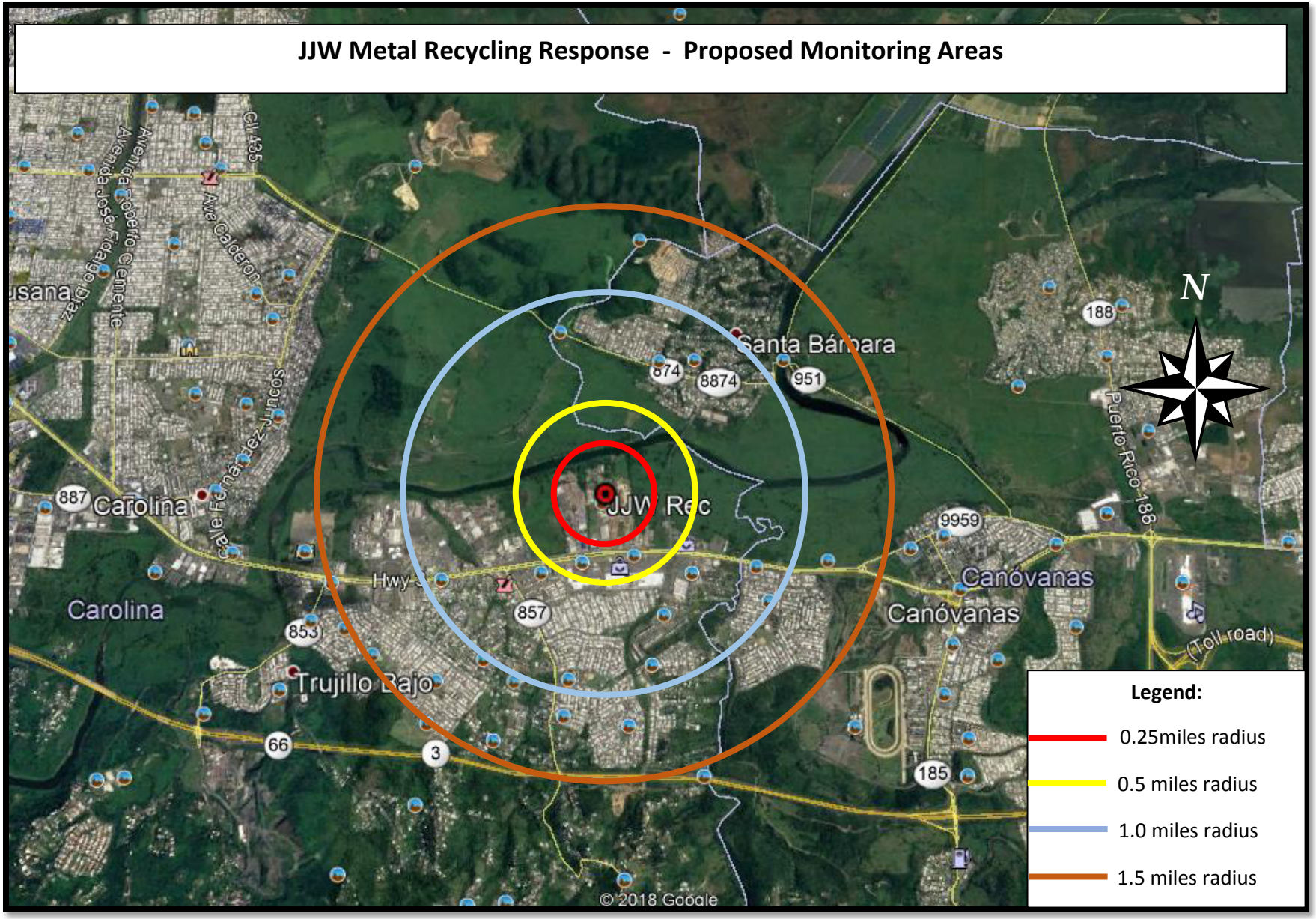
The specific community notification procedures will be at the discretion of the EPA OSC. The exact notification procedures will be developed based on the most feasible means of getting information to the surrounding community in an effective, useful, and timely manner.

3.2 On-Site Reporting Procedures

The Site Health and Safety Representative will maintain a sample log and report airborne levels on a daily basis to the EPA OSC. Elevated results (above Site-Specific Action Level) will be reported immediately to the EPA OSC so that appropriate engineering controls can be implemented to reduce airborne levels.

Attachment A

Figure 1: Proposed Monitoring Area Map


JJW Metal Recycling Response - Proposed Monitoring Areas
N
JJW Rec
Carolina
Trujillo Bajo
Canóvanas
Santa Bárbara
Hwy 3
Puerto Rico 188
(Toll road)
Legend:
0.25miles radius
0.5 miles radius
1.0 miles radius
1.5 miles radius
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