

Community Air Monitoring Plan Addendum

Powerhouse Deconstruction – Hudson Falls, New York
CERCLA Docket No.: CERCLA-02-2022-2016

March 6, 2023

This Addendum to the Community Air Monitoring Plan (Appendix E to the Powerhouse Deconstruction Design Report, August 2022), modifies the ambient air monitoring program for PCB and vapors in consideration of ongoing project activities. In consultation with United States Environmental Protection Agency (EPA) and New York State Department of Environmental Conservation (NYSDEC), the scope and frequency of monitoring will continue as summarized below, and may be further adjusted to reflect work activities, monitoring results (as received), field observations, etc.

Adjustments to Monitoring Scope and Frequency

- For ambient air monitoring for PCBs and vapors, the following procedures will be implemented via this Addendum. At a minimum, monitoring will be performed weekly on a day when active deconstruction and/or material handling activities are performed.
- Daily sample collection and analysis will be performed when work activities will encounter building materials, soils, or DNAPL containing or potentially containing HF Contaminants.
 - If work activities are limited to the management of groundwater or perched water that does not contain DNAPL, daily PCB and vapor monitoring is not required.
- If there is certainty by the Respondents that planned work activities will not encounter building materials, soils, or DNAPL containing or potentially containing HF Contaminants, ambient air monitoring for PCB and vapors will not be required. In this scenario, in the absence of active PCB and vapor monitoring work activities that encounter materials containing HF Contaminants cannot be performed.
- To accommodate changes that may occur between planned and actual work activities within a given day, and to safeguard against performing unplanned work that encounter materials containing HF Contaminants without active monitoring, the Respondents may collect daily samples for PCBs and perform real-time vapor monitoring. In this scenario, a prompt decision to submit the collected PCB samples for laboratory analysis will be made in consultation with USEPA considering the actual work activities performed that day.

The monitoring locations, sampling and analytical procedures, and Control Level and Action Level remain as presented in the CAMP, as well as the current monitoring program for airborne particulates.