

MINIMUM AIR MONITORING STANDARDS AND REQUIREMENTS

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1. The Air Quality Management and Monitoring Plan (“the Plan”) shall include:

a. The means and methods used to perform the South Terminal Project upland work. The means and methods shall be designed and implemented in a manner that minimizes airborne PCBs, particulates, lead, and asbestos, if present, to the maximum degree practicable. The Plan will detail the means and methods to be used to maintain airborne contaminant, levels at the performance standards specified in Item 3, below. The Plan will be in effect continuously until completion of the work.

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b. A description of how the Commonwealth will:

- Establish a minimum of 4 perimeter air monitoring locations;
- Define air monitoring procedures, parameters and detection limits and the process for modification to these with EPA approval. Air monitoring parameters shall include particulates (PM₁₀), PCBs, asbestos, and lead.
- Define air monitoring frequency based on site activity and the process for modifying frequency with EPA approval;
- Establish background levels; and,
- Calculate a running average of airborne PCB levels monitored at each air monitoring location during performance of the work. This station-specific average shall be submitted to EPA within three days of receipt of the laboratory data.

2. Aroclor versus PCB Homolog Analysis: To be consistent with previous airborne PCB sampling from other site remediation activities in and around the Harbor, EPA recommends at a minimum, that the total homolog approach be used to determine the concentration of total PCBs in air. However, if the proponent can demonstrate, through the performance of a comparative analysis study showing the results of paired homolog versus Aroclor data, that airborne Aroclor data are equivalent to total homolog data at the South Terminal upland work area, EPA will consider use of the Aroclor approach as an alternative. Proponent must first propose and EPA approve, the method for the comparative analysis prior to its implementation.

3. The Commonwealth shall use best management practices to comply at all times during performance of the work, with air quality performance standards. On the upland area, the point of compliance for air quality performance standards shall be the property boundary. At a minimum, a fence shall be constructed along the property boundaries during remedial activities.

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4. PM₁₀ results are used to provide information about the effectiveness of emission controls and thus when kept under control, emissions from other contaminants, such as PCBs and asbestos, will also be controlled. In order to better control conditions during the Project, tiered action levels based on real time PM₁₀ results shall be taken. The Commonwealth shall initiate dust controls at levels lower than the 100 µg/m³ 10-hour TWA, and shall apply these action levels to shorter time periods as specified below. At no time during the performance of the remedial work shall levels exceed the following standards:

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 <#>Airborne PCBs: not to exceed background or 0.10 µg/m³, whichever is higher ¶
 <#>Airborne asbestos: not to exceed 0.1 fiber/cc¶
 <#>Lead: not to exceed 50 µg/m³¶

CONTAMINANT	MEASURED LEVEL	ACTION
Airborne Particulates ^(a) (PM ₁₀)	Any visible dust emissions from Project activities	Implement corrective measures to control dust (e.g., water sprays)
Airborne Particulates ^(a) (PM ₁₀)	> 75 µg/m ³	Increase application rate of dust controls
Airborne Particulates ^(a) (PM ₁₀)	> 150 µg/m ³	Continue wetting of source area. Suspend Project activities and notify EPA
Airborne Particulates ^(b) (PM ₁₀)	> 100 µg/m ³	Continue wetting of source area. Suspend Project activities and notify EPA
Airborne PCBs ^(b)	> 0.10 µg/m ³	Suspend Project activities and notify EPA
Airborne asbestos	> 0.1 fiber/cc	Suspend Project activities and notify EPA
Airborne Lead	> 50 µg/m ³	Suspend Project activities and notify EPA

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^(a) Based on 5-minute TEOM[®] data or equivalent

^(b) Based on a 10-hour Time Weighted Average (TWA)

5. The Commonwealth may propose an alternate airborne PCB standard (Not To Exceed 0.260 µg/m³) for properties along the fence line where no residential property exists within 200 feet of said fence line.

In the event of an exceedance and work stoppage is required., the Commonwealth shall submit a proposed corrective action plan to address the exceedance. Work shall resume only with EPA's approval and upon implementation of the corrective action plan.

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