

**Below are questions that Manhattan Community Board 1 has received from community members between Monday, February 14, 2022 - Friday, February 18, 2022 regarding the 250 Water St Brownfield Cleanup Program, and corresponding responses from Lawra Dodge, President of Excel Environmental Resources and Independent Community Monitor for this project.**

Contact CB1 via Diana Switaj at [dswitaj@cb.nyc.gov](mailto:dswitaj@cb.nyc.gov) with any questions or comments for Lawra Dodge.

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**Thursday, February 17, 2022 7:17 PM**

Tom Fusillo and I have reviewed what happened with the “spike” and I have had two calls with Paul McMahon at Langan and we are all in agreement that this was an equipment malfunction, the same situation that occurred during one of the days of the RI. Langan handled it correctly, they confirmed air quality with the J505 and the readings were zero and they pulled the J405 from the CAMP case and the readings were then zero as well. The Daily Field Report explains this and I reviewed the Draft Daily Field Report as did Tom and the DEC/DOH, and we are all in agreement that the “spike” was not real.

With the CAMP units at this Site, the instruments are running continuously pulling air samples once a minute and, once in a while, equipment malfunctions can be the result but this is only the second time it has happened and Langan did the right thing by verifying it with the J505 and then pulling the J405 out of the CAMP case to check it.

This has happened to us on other projects at a much higher frequency and it has only happened twice at this Site despite there being weeks and weeks of intrusive field work where the CAMPs were operating.

Also, the Jerome J405 is one of the only mercury vapor analyzers that can run continuously all day long on battery power, last the entire field day, and give us good data that, in the case of this Site, is backed up by the Jerome J 505. The battery for the meter that I spoke to Nick Hummel about cannot last more than 2-4 hours in this application and the J505 cannot be tied into the telemetry system, nor can the Lumex instruments, so the combination of the J405 in the CAMP units and use of the hand-held J505 by the downwind monitor remains the best approach.

Note also that HHC has sent the (corrected) announcement (attached) that the soil borings are scheduled to start next Monday, 2/21/22 while the Peck Slip and Blue School both have Winter Recess.

I confirmed with Langan that they will have one drill rig operating on Monday and two rigs operating Tuesday through Friday. Paul McMahon also confirmed that if they don't finish all 50+ soil borings by the end of day next Friday, they will have to do so next weekend which means they have no intention of drilling the week of Monday, 2/28/22 when school is back in session. Note that the updated RDI Workplan and all changes to the CAMP and site protocols that we requested will be put in place.

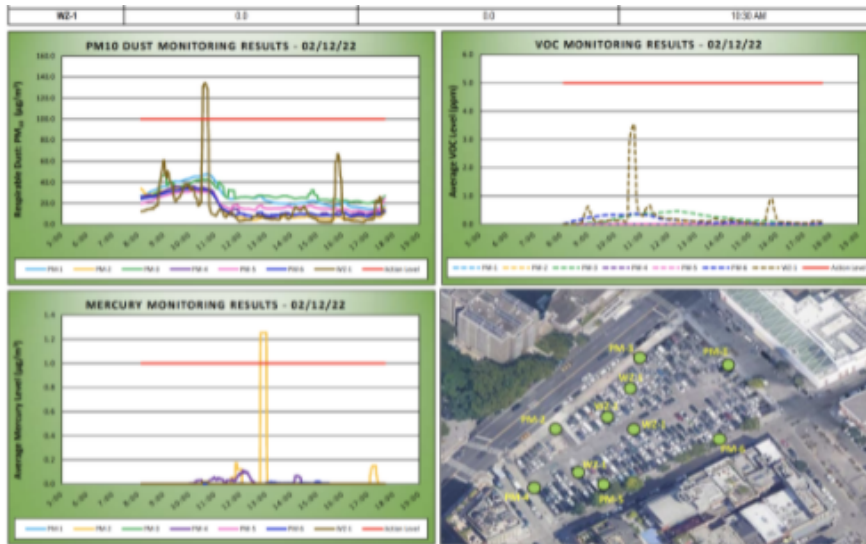
Lawra J. Dodge, P.G., LSRP  
 President  
 Excel Environmental Resources, Inc.

Thursday, February 17, 2022 1:25 PM

Ricky just posted the data was available and I looked.

You can see from the screen grab there was another spike and again - (the third graphic bottom row) and we are told just those results were wrong. Another anomaly. How are there two anomalies that occurred in two completely different years at the same location? I believe there is a genuine misunderstanding of how mercury vapor is escaping and reacting at the site.

<https://img1.wsimg.com/blobby/go/3ccc0a03-a2c3-45ba-87f2-b97ac50e91e1/downloads/Langan%20250%20Water%20St%20DAMR%2002.12.22.pdf?ver=1645049108349>



**Air Monitoring Notes:**

\*Mercury vapor concentrations exceeded the action level established in the CAMP from 12:48pm to 1:01pm at perimeter station PM-2, which was located along "Pump Street," next to the parking lot entrance. The exceedance was determined to be an erroneous high reading resulting from an equipment malfunction or unknown interference and mercury vapor data from the Jerome® 505 mercury analyzer indicates the erroneously high reading is not a result of ground moisture activity. During this time, AARC was in the process of backfilling test pit TP-02 after the test pit was open for one hour. Perimeter station PM-2 was located about 320 feet and in an upwind direction from the TP-02 work zone.

- Instantaneous mercury vapor concentrations within the work zone during this time were collected using the Jerome® 505 mercury analyzer and readings ranged from 0.00 µg/m³ to 0.05 µg/m³.
- The work zone station (WZ-1) was located between TP-02 and PM-2 and Jerome® J405 15-minute average mercury concentrations remained at 0.0 µg/m³ throughout this time period.
- Two instantaneous readings of 14.30 µg/m³ and 4.50 µg/m³ were recorded at PM-2 before returning to the daily average of 0.0 µg/m³. The instantaneous readings were immediately checked at the perimeter station using the Jerome® 505 mercury analyzer and a maximum concentration of 0.01 µg/m³ was recorded.
- Additionally, the independent community monitoring conducted continuous monitoring with a Jerome® J405 throughout the day and reported that mercury vapor was not detected, with all readings measured at 0.0 µg/m³.



**Thu, Feb 17, 2022 at 1:16 PM**

Have you been given access to the Test Pit data? I also want to ask how the engineers normalized any data information gathered when the conditions were so starkly different from day one and day two of the work. The temperatures measured went from 60 degree highs to 25 degree lows that weekend.

Aside from being able to better understand how to read the data with so much change in temperature concerning a substance that is highly impacted by temperature, what calculations are done to understand the true nature of the contamination overall? Is there a recognized formula that reliably converts data gathered at 25 degrees to accurately represent what will happen on any 90 degree day? The rate of mercury volatilization is directly related to temperature.

If the remediation happens over hotter months - isn't the risk of volatilization of elemental mercury greater which would in turn cause the release of more mercury vapor?

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**Friday, February 18, 2022 11:19 AM**

The test pit work scope was to evaluate air quality in the mercury impacted areas, debris and void areas and soil sampling was not part of the work scope, however, the soil boring program includes collection of soil samples for lab analysis for waste disposal characterization for disposal and for further evaluation of petroleum impacts in the tank areas—samples for volatile organically will be collected in accordance with protocols designed to ensure that volatile compounds are not lost during sampling and transport of samples to the lab.

Lawra J. Dodge, PG, LSRP  
President  
EXCEL Environmental Resources, Inc.

**Thursday, February 17, 2022 8:16 PM**

To clarify - there were no samples that went to the lab during the test pits?

When I meant samples, I meant soil samples going to the lab. Sorry for the confusion. So borings are done next week, do they take the soil and send it out to the lab for testing? And if

they do, are those samples protected, meaning are they removed in a sealed tube and sent to the lab so that vapor doesn't off gas?

Or are the samples exposed to the air on the site before being packed up for testing?

I ask because I am thinking about how they get an accurate reading in vapor and volatiles.

**Feb 17, 2022, at 7:11 PM**

The purpose of the test pits in this case was to conduct a smaller scale replica of what the larger scale soil excavation activities will look like when the Remedial Action is implemented in order to better assess air quality during excavation. The other objective in my view was to evaluate the debris areas and void space areas to evaluate whether or not there is mercury associated with the debris or trapped mercury vapor in the void spaces that would be potentially released when the larger scale excavation takes place.

So the test pit excavation mirrors the steps in the larger soil excavation: the asphalt is removed, soil is excavated down to a pre-determined depth (in this case 8 feet below grade), the excavated soil is piled on plastic next to the excavation and, while all of this is going on, air quality is monitored in the Work Zone, directly in the test pit, in the vicinity of the soil pile, downwind of the Work Zone, and further downwind at the perimeter CAMP stations to determine what to expect when the hot spot soil removal in the mercury-impacted areas is conducted.

Air "samples" are not collected per se, the ambient air quality is monitored using the CAMPs and the hand-held instruments to gather mercury vapor, VOC and dust/particulate data to determine if there will be an adverse air quality condition during the larger scale soil excavation. If the data indicated elevated mercury or VOC concentrations that increased as the excavation proceeded or were sustained over the course of the excavation at levels that approached or exceeded the action level based on the 15-Minute Average, then that would suggest that the technical approach to the larger scale soil excavation, the best management practices, and/or the CAMP may require modification.

When the soil borings are conducted as part of the next and final stage of the RDI, assuming there are no adverse air quality issues, Langan/HHC will take that information and determine if they should propose to DEC/DOH any changes to the Remedial Action Work Plan, including the CAMP, for the larger remediation.

Lawra J. Dodge, P.G., LSRP  
President  
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**Thursday, February 17, 2022 3:06 PM**

Is there a link you can send that would explain the protocols of how to do a test pit? I just want to understand procedures so I can have a clear understanding of what was being done when looking at data and thinking about all this.

Mainly- how do they collect samples and when /how do they test?

It looked like when they did the borings in 2020 they would leave the borings out in the sun. Are there samples that they take that are protected (like in a sealed sleeve that goes directly to the lab so no vapor can escape)?

Any websites or perhaps protocols are in the the DEC documents?

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**Fri, Feb 18, 2022 at 9:39 AM**

Mon- Friday starting 2/21/22 from 7 am to 5 pm, if they do not finish by Friday 2/25/22 they may need to drill on Sat 2/26/22 and possibly Sunday 2/27/22 typically 7 am to 4 pm on weekend days, but they won't know if they need to work on the weekend until work gets underway next week.

Lawra J. Dodge, PG, LSRP  
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**Feb 18, 2022, at 9:32 AM**

Can they tell us when they're drilling? We really need notice in advance.

**Wed, Feb 16, 2022 at 2:09 PM**

The schedule is still tentative but, currently, the 50+ soil borings to be conducted as part of the RDI are scheduled to start on Monday, 2/21/22 and extend through next Friday, 2/28/22. This schedule is weather permitting and, I believe, based on using two drilling rigs simultaneously in an effort to get them all done during the week when the schools are on Winter Recess.

Before the test pit investigation was conducted, the discussion with DEC/DOH centered on Langan/HHC completing any remaining borings the weekend of 2/29/22, if there were any borings left to be done.

Until DEC/DOH completes their review of the Daily Field Reports from the test pits conducted this past weekend (which DEC/DOH just received today, we will not know if the agencies would allow any remaining soil borings (if any) to be conducted the week of 2/28/22 when the schools are back in session but we will ask them to let us know as soon as possible.

I will email DEC/DOH later this afternoon to ask about the schedule since I know they just received the Daily Field Reports and I want to give them some time to do their review.

I will copy everyone from CB-1 on my email so you can see their response.

Best, Lawra

Lawra J. Dodge, P.G., LSRP  
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**Wednesday, February 16, 2022 1:35 PM**

Do we have specific start and end possible end dates for the next round of drilling at 250 Water Street? I was told it could be Sat, Sun or Monday.