Draft of 12/08/12

COMMENTS ON
PERIMITER AIR MONITORING PLAN
FACILITY DEMOLITION
November 21, 2012

GENERAL COMMENTS

This Plan is too vague and general to afford an opportunity for meaningful comment. Much more detail regarding specific circumstances at the plant needs to be supplied before this Plan will be viable. Among other things, it only addresses perimeter control without addressing considerations of safety and health for the workers who will be performing the demolition activities.

In addition, the plan makes no mention or provision for public participation in the process. The public needs to have access to the data being generated and the ability to perform an oversight role in conjunction with regulatory agencies.

SPECIFIC COMMENTS

Page 1, ¶1.0, third paragraph. Do high particulate levels for workers trigger "take action" or "stop work" measures?

Page 4, Section 3.1. The Plan calls for monitoring "during demolition activities that could generate dust." However, monitoring should be continuous, since dust sources such as inactive demolition areas could go unchecked for quite some time, particularly since a true fence-line monitoring network is not being deployed but rather only a select number of targeted monitors that will only be placed up/downwind of active areas. In addition, who decides whether an activity "could generate dust"? Continuous monitoring would be more appropriately protective.

Page 5, ¶3.3.1., third paragraph. How long will it take to get sample results?

Page 6, ¶3.3.2. The "take action" and "stop work" levels in this section do not, but should, address the $PM_{2.5}$ standard. The 24-hour $PM_{2.5}$ standard is 0.035 ug/m^3.

Page 7, ¶3.5. This section makes reference to "real time access to values from each instrument." Will there be public access to the real-time data, or only private? Will the data be saved and be made publicly available? This would be important for comparison to TCEQ monitoring data. Will notifications be saved and be made publicly available for comparison to TCEQ monitoring data? Will the hours of demolition operations be logged for comparison to TCEQ monitoring data, as well as for verification that "Take Action"/"Stop Work" notifications are actually observed and not ignored?

Page 7, ¶3.5.1. The Plan is silent about how often the data will received and reviewed. Will it be continuous or intermittent?

Page 8, ¶3.6. There should be an alarm for exceedances of applicable air quality levels rather than simply text messages. In addition, will there be a record of when notices are made, when activities stop, and activities are resumed?

Page 9, ¶3.7.2. The particulate "stop work" levels also should be triggered by 30-minute particulate concentrations.

Page 10, ¶4.1, first paragraph. Correlation of analytical every two (2) weeks is too long a time frame. Data should be correlated much more frequently to ensure that excessive particulate levels do not go undetected for too long.

Page 10, ¶4.1, second paragraph. Samples for metals analysis should be collected every day that demolition activities are occurring rather than just every other day.

Page 14, ¶5.1, second paragraph. Reports should be completed the day following the day that monitoring is performed. What are "verifiable results"?