

Memorandum: Perimeter Air Monitoring Plan for the Bel Air Dam Removal Revision 01

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Air monitoring has been ongoing since June 23, 2025 with the start of sediment activities as part of the Removal of the Bel Air Dam per the requirements of the Perimeter Air Monitoring Plan (PAMP) dated February 2025. With the approach of the project's six-month mark, AECOM has reviewed the PAMP with respect to the sediment removal plan/approach by the contractor and has made some adjustments to the air monitoring to better align with the excavation plan. The changes to the air monitoring approach are summarized below.

- **Air Monitoring Station Relocation and Reduction** – The PAMP was developed with the understanding that sediment would be removed from the Sediment Removal Area upstream of the dam and placed in the Sediment Processing Area to prep for off-Site disposal. Therefore, the four (4) fixed location air monitoring stations (AMS) were placed in the Sediment Processing Area under the assumption that this area would pose the highest potential for dust emissions and two (2) portable AMS were placed upwind and downwind of the riverbank upstream of the dam. As work has progressed, sediment has been direct loaded or stockpiled on the riverbank upstream of the dam along Wahconah Street and the area understood to be used as the Sediment Processing Area has largely been used for equipment and material staging. Therefore, the positions of the AMS have been revised to provide a greater focus on the activities upstream of the dam on the sediment loading and stockpiling activities. This resulted in a smaller overall footprint and the number of AMS was reduced from 6 (six) to 5 (five) AMS starting November 17, 2025. The new locations of the AMS are shown in **Figure 1**, which has been enhanced to show the locations of routine hand-held monitoring as well.
- **Completion of Naphthalene Sampling** – Naphthalene sampling commenced on July 17, 2025 and was planned while sediment activities were ongoing in the northern portion of the work area (which is where sediment was found to have elevated naphthalene concentration). Sediment has been excavated from this area of the site and has been removed from the site or has been stockpiled in the work area. Results of the ongoing naphthalene sampling are summarized in the Weekly Air Monitoring Summaries including updated project-to-date average concentrations at each AMS. Since the start of sediment activities, naphthalene concentrations have remained below the project's Acceptable Ambient Concentration (AAC) for naphthalene with only one concentration detected above the laboratory's method detection level (MDL) at AMS-1 on September 24, 2025. This detected concentration couldn't be linked to any onsite activities and may be the result of an offsite source. With the anticipated offsite disposal of the stockpiled sediment from this area of the site and the results of the ongoing sampling, AECOM is planning to stop sampling for naphthalene once the material from the impacted grids has been removed from the site.
- **Confirmatory Hand-Held Mercury Vapor Monitoring** – AECOM has been performing hand-held mercury monitoring twice a day at the site perimeter upwind and downwind of the site. The results of this monitoring have not resulted in any detected mercury vapor during the project-to-date. These results document that the risk for mercury vapor and/or the onsite vapor/dust control operations at the site are effective at mitigating the presence of mercury vapor. Therefore, mercury vapor monitoring was concluded at the end of the day on November 14, 2025. If conditions or the concentrations in sediment significantly increase above what has been observed to date, mercury vapor monitoring will be restarted until it can be adequately determined that it's being controlled in real-time.

This memo documents the changes to the air monitoring approach and will serve as an Amendment to the PAMP. Changes to the PAMP will be reflected in the Weekly Air Monitoring Project Summaries and Final Report.

Figure 1: Proposed Site Map

