S.R. Duffie Consulting, LLC
5 East Main Street
Mechanicsburg, PA 17055

November 13, 2026

Clean Air Board of Central Pennsylvania
ATTN: Frank P. Castrina MD. Member
528 Garland Drive
Carlisle, Pa. 17013

Re: Frog Switch Redevelopment
Perimeter Air Monitoring

Dear Members of the Clean Air Board,

Thank you for your October 28, 2026 letter regarding Phase 2 remediation and demolition activities at the Frog Switch Redevelopment Site. We appreciate your thoughtful review of the environmental reports and your concern for protecting nearby residents, businesses, and community institutions, including Letort Elementary School.

Following receipt of your letter, the project team reviewed your recommendations with our environmental and Hazardous Building Materials (HBM) professionals. While the environmental investigation identified certain metals in site soils, our technical review concluded that the primary potential pathway for off-site exposure would be through airborne soil particulates generated during demolition, excavation, or soil-disturbance activities. Accordingly, controlling and monitoring dust emissions represents the most appropriate and effective means of protecting the surrounding community.

Air monitoring was performed during Phase 1 of this demolition project, and the monitoring results were provided to the Clean Air Board. All monitored results were below the Total Nuisance dust standard permissible exposure limit (PEL).

As a result of this review, the project team has included in the Phase 2 bid specifications to strengthen contractor responsibilities related to dust management and perimeter air monitoring.

Specifically, the demolition contractor will now be required to retain a qualified environmental or industrial hygiene professional and prepare a site-specific **Perimeter Air Monitoring Plan (PAMP)** prior to the start of demolition activities. The PAMP must establish monitoring locations, monitoring protocols, action levels, dust-control procedures, reporting requirements, and corrective measures for elevated particulate levels.

In addition, the specifications require perimeter air monitoring during below-grade demolition and other dust-generating activities. Monitoring may include PM10, PM2.5, or other appropriate real-time particulate monitoring technologies. The purpose of this monitoring is to verify the effectiveness of dust-control measures and provide early notification of elevated particulate conditions so that corrective measures can be implemented promptly.

The revised specifications also require:

- Continuous implementation of dust suppression and fugitive dust control measures;
- Daily monitoring documentation and reporting;
- Defined corrective actions when project-specific particulate action levels are exceeded;

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- Prompt notification of significant dust events or community complaints; and
- Preparation of a final monitoring report documenting monitoring activities and project performance.

From a technical perspective, our consultants do not believe routine air sampling for individual metals such as arsenic, cobalt, iron, or manganese is necessary if dust emissions are effectively controlled and particulate monitoring confirms that site-generated dust is not migrating beyond the project boundaries. The metals identified in the soil are not expected to become airborne independently; rather, any potential transport would occur through dust particles generated by site activities. Therefore, effective dust suppression and perimeter particulate monitoring are considered the most practical and protective approach for this project.

We believe these enhancements provide a reasonable, science-based framework to protect workers, nearby properties, and the surrounding community while ensuring that demolition and remediation activities are conducted in a responsible manner.

We appreciate the Clean Air Board's continued interest in the project and welcome continued dialogue as Phase 2 activities move forward.

Sincerely,

Donald Sokoloski

Donald A. Sokoloski
Project Executive, SRDC

Cc:

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