

**TOWN OF OYSTER BAY
BETHPAGE COMMUNITY PARK
INTERIM REMEDIAL MEASURE - CONSTRUCTION AREA**

**REMEDIAL ACTION -
H2M PROJECT MANAGEMENT PLAN ADDENDUM**



February 16, 2007

Prepared For:

**Town of Oyster Bay
Department of Public Works**

H2M GROUP

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1.0 INTRODUCTION

This Project Management Plan Addendum has been prepared in response to a request from the New York State Department of Environmental Conservation (NYSDEC) for a summary document that details response actions that will be implemented following the excavation of certain unanticipated materials that may be encountered during the remedial action phase of the Interim Remedial Measure for the Bethpage Community Park in Bethpage, New York (Site). For the purposes of this document, unanticipated materials may include, but are not limited to, miscellaneous debris including petroleum contaminated wood, metal, bricks, hoses, tires, concrete, plastic, drums and liquids.

The Town of Oyster Bay entered an Order on Consent (W1-0018-02-03) with the NYSDEC in order to expedite the investigation and remediation of historical site contamination in an approximately 7-acre portion of the 18-acre Park. The IRM remedial action, within the portion of the Bethpage Community Park that has been designated as the Construction Area, was initiated in December 2006. The IRM remedial action is being conducted in accordance with a NYSDEC-approved Remedial Action Plan that involves the excavation and off-site disposal of approximately 100,000 cubic yards of contaminated soil.

Prior to implementation of the IRM remedial action, project specific plans were prepared including a Site Operations and Excavation Plan, Community Health & Safety Plan (CHASP), Community Air Monitoring Plan (CAMP) and H2M Project Management Plan. These plans were reviewed and accepted by the NYSDEC. Site specific Health & Safety Plans for H2M and the



remediation contractor, BlueWater Environmental, Inc. (BWE), were also prepared and implemented.

Provided herein are details of H2M's response actions to be utilized to characterize and manage unanticipated materials.

2.0 PROJECT STATUS

The IRM remedial action plan, as approved by the NYSDEC in May 2006, entails the excavation and off-site disposal of approximately 100,000 cubic yards of contaminated soil. The plan was developed based on the findings of the remedial investigation, which consisted of the advancement of approximately 150 soil borings utilizing both hollow-stem auger and direct-push drilling techniques. Review of historical site information along with field screening and documentation of soil boring logs during the remedial investigation provided a conceptual characterization of subsurface conditions.

Based on the findings of the remedial investigation including analytical sampling results and documentation of boring logs, the generation of different types of waste streams was anticipated for the remedial action plan including construction and demolition debris, RCRA non-hazardous waste, RCRA hazardous waste, non-TSCA regulated PCB contaminated waste (PCB conc. >5, <50 ppm) and TSCA regulated waste (PCB conc. >50 ppm).

As part of the ongoing remedial excavation activities, significant debris areas have been discovered. During the remedial investigation, fill areas with miscellaneous debris including wood, metal, and fibrous material were identified and documented. However, in some cases, the findings of the remedial investigation did not fully define the significant extent of historical dumping and debris that has been encountered. Handling and disposal of the debris can be accomplished under the existing waste streams. However, alternative cost effective disposal options are under consideration.

3.0 SITE RESPONSE ACTIONS

This section summarizes the project specific response actions that will be followed for identifying, characterizing, handling and disposing of debris and/or unanticipated material such as liquids or drums. These general procedures have been and will remain in effect for the duration of the Bethpage Park IRM remedial action.

Contractor requirements for health and safety and site operations are summarized in the Site Operations and Excavation Plan, which includes specific plans for Environmental Pollution Control, Dust Control, Spill and Discharge Control, Construction Water Management and Transportation and Disposal. In accordance with the Project Contract, Contractor requirements for site operations require compliance with:

- A. Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities: NIOSH, 85-115.
- B. OSHA Safety and Health Standards: 29 CFR 1910 and 1926.
- C. USEPA, Office of Emergency and Remedial Response, Standard Operating Safety Guides: November 1984.

The Contractor Site-Specific Health & Safety Plan requires employee training in the following areas: hazard identification, hazard communication, fire fighting response, evacuation procedures, lockout/tagout (for appropriate employees), stairway and ladder training, equipment operator, and hazard specific training. Project staffing and organization, and emergency contact information have been reported in the NYSDEC accepted project plan submittals including the H2M Project Management Plan and Community Health and Safety Plan. As previously reported, all on-site personnel are required to have appropriate OSHA-training.

A flow chart to be utilized by H2M for the purpose of tracking contractor response actions during site excavation work is provided herein as Figure 1. As shown, the general response actions include 1) Identification of the hazard/material, 2) Assessment of the hazard, 3) Notification to

Regulatory Agencies, 4) Handling of the hazard/material, 5) Characterization of the hazard/material and 6) Shipment of the material for off-site disposal.

During the Bethpage Park IRM remedial action, the potential exists for dangerous and uncharacterized material to be unearthed. If and when unexpected material is exposed, the contractor's and H2M's Site Manager and Site Safety Officer will be notified as part of the assessment of the potential hazard. Additional personnel will be brought on-site, if required, to properly assess the situation. The appropriate response action will be dependent on this assessment. Response actions will be implemented to minimize worker health and safety, community health and safety and environmental impacts. Furthermore, the response actions will be dependent on the physical properties of the unearthed material.

If the initial assessment determines the potential for a dangerous condition, such as exposing a sealed and bulging drum, then excavation work will cease and an appropriate response, handling and sampling plan will be developed. To help assess the uncharacterized material (e.g., drums, debris, or liquids), historical information, site conditions in the excavation (i.e., characterization of soil), additional material in the excavation (i.e., other debris or drums), and possible markings or labeling on the uncharacterized material will be used. Field screening instruments, including but not limited to a multi-gas meter and/or portable photoionization detector (PID) will be used. If liquid materials are uncovered, following an initial danger assessment, liquid materials will be contained and the source of liquid identified. Liquids will be properly containerized for disposal. Excess water in excavation areas resulting from stormwater runoff, or possible perched water, will be addressed as part of the Construction Water Management Plan.

As a contingency to the potential interaction with and exposure to hazardous materials that may be unstable and dangerous in terms of worker safety and/or community safety, the contractor is required to maintain certain emergency response equipment, as well as personnel trained to use such equipment, at the site including the following: personal protective equipment (PPE), first aid kits, fire extinguishers and spill response kits (e.g., plastic sheeting, tarps, kitty litter, shovels, overpack drums).

If uncovered material is not deemed to be immediately dangerous, the material will be removed and placed in a staging area. As stated within the Site Operations and Excavation Plan, staged or stockpiled solid material will be placed on poly sheeting and covered. If deemed appropriate given the nature of the material and the disposal facility requirements, a specific sampling plan will be developed to further characterize any staged material for off-site disposal. All uncharacterized materials uncovered during the remedial excavation program will be documented in daily logs. Location and volume or quantity will also be recorded. Where appropriate, the extent of uncharacterized material will be delineated to enable effective excavation, handling and off-site disposal.

FIGURE 1

BETHPAGE PARK IRM REMEDIAL ACTION EXCAVATION RESPONSE FLOW CHART

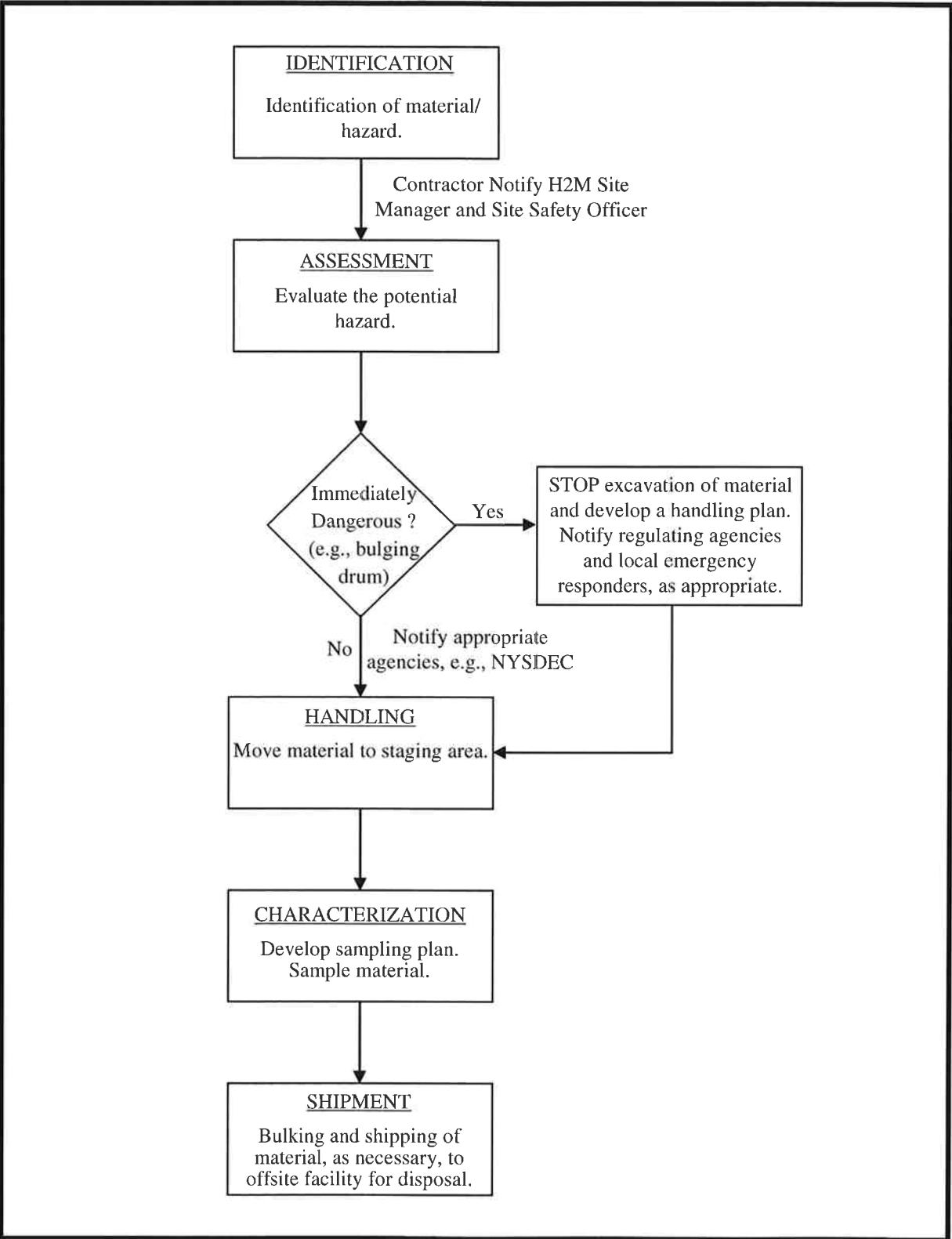


Figure 1. Bethpage Park IRM Remedial Action Excavation Response Flow Chart