BREEZE-EASTERN LLC

INTERIM SITE MANAGEMENT PLAN (REVISION 1)

FORMER TRANSTECHNOLOGY FACILITY, NASSAU COUNTY, GLEN HEAD, NEW YORK, NYSDEC SITE# 1-30-101

SEPTEMBER 23, 2022

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FORMER TRANSTECHNOLOGY FACILITY, NASSAU COUNTY, GLEN HEAD, NEW YORK, NYSDEC SITE# 1-30-101

BREEZE-EASTERN LLC

PROJECT NO. 31400522.000
DATE: SEPTEMBER 23, 2022

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Revisions to Final Approved Site Management Plan:

Revision No.	Date Submitted	Summary of Revision	NYSDEC Approval Date
1	September 27, 2021 (*Interim Site Management Addendum*)	The SMP update (based on an approved SMP addendum, dated September 27, 2021) provides clarification of the roles of future site parties. This includes the establishment of a homeowners' association (HOA) whose responsibility will be to ensure compliance with site controls, conduct the required inspections, and submit a Periodic Review Report to the New York State Department of Conservation annually. The update also provides additional information on the intended future land use for Parcels A and B (defined below).	July 12, 2022

CERTIFICATION

CERTIFICATION STATEMENT

I, David Alan Rykaczewski, certify that I am currently a NYS registered professional engineer and that this Interim Site Management Plan was prepared in accordance with all applicable statutes and regulations and in substantial conformance with the DER Technical Guidance for Site Investigation and Remediation (DER-10).

P.E. (No. 099287)

9/23/2022 Date

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EXECUTIVE SUMMARY

The following provides a summary of the controls implemented for the Site, as well as the inspections, monitoring, maintenance, and reporting activities required by this Site Management Plan (SMP):

Site Identification:	**Former TransTechnology Facility** (New York State Department of Environmental Conservation [NYSDEC] Site # 1-30-101) 1 Robert Lane Glen Head, New York

Institutional Controls:	1. The property may be used for Residential use (Parcel A only) and Restricted Residential use (entire property)
	2. The following specific controls have been implemented: — Compliance with the Environmental Easement and this SMP by the Remedial Party and the Remedial Party's successors and assigns. — A homeowners' association (HOA) will be established before any structures are occupied. The HOA will be responsible for ensuring compliance with the institutional and engineering controls (ICs and ECs) associated with Operable Unit No. 1 (OU-1) listed in this SMP for the entire Site (i.e., within the Residential Land Use, designated as Parcel A; and, in the Restricted Residential Land Use area, designated as Parcel B), conducting the required inspections, and reporting the results to the NYSDEC. — All ECs must be operated and maintained as specified in this SMP. — All ECs on the property must be inspected at a frequency and in a manner specified in the SMP. — Data and information pertinent to Site management of the property must be reported at the frequency and in a manner specified in this SMP. — The property may be used for Residential use (Parcel A only) and Restricted Residential use (Parcels A and B [entire property]) provided that the long-term ICs and ECs included in this SMP are employed (as ensured by the Site owner and then the HOA). — Only land uses specified in the environmental easement are permitted. — Parcel B may not be used for a higher level of use, such as "residential" or "unrestricted" use and Parcel A may not be used for "unrestricted" use, without amending the Environmental Easement, as approved by the NYSDEC. — All future activities on the property that will disturb soils with Remaining Contamination or soils that are suspected of having Discovered Contamination must be conducted in accordance with this SMP, including the Excavation Work Plan (EWP) in Appendix D. — The use of the groundwater underlying the property is prohibited without treatment rendering it safe for intended use and pre-approval by NYSDEC. — Vapor mitigation systems must be incorporated into the design and construction for any buildings developed on the property, unless otherwise approved by NYSDEC. — Vegetable gardens and farming on the property are prohibited, unless otherwise approved by NYSDEC. — The Site owner will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and (2) nothing has occurred that impairs the ability of the controls to protect public health and

Site Identification: **Former TransTechnology Facility** (New York State Department of Environmental Conservation [NYSDEC] Site # 1-30-101)

1 Robert Lane

Glen Head, New York

	environment or that constitute a violation or failure to comply with the SMP. This certification shall be submitted annually using the attached inspection reporting form (Appendix E) and will be made by a qualified environmental professional, as defined in 6 New York Codes, Rules and Regulations (NYCRR) 375-1.2(ak). The responsibility for this annual certification will transfer to the HOA when it is established. The NYSDEC retains the right to access the property to evaluate the continued maintenance of all controls.
Engineering Controls:	1. All structures designed for long-term human occupancy (e.g., residential structures) at the Site will require an active sub-slab depressurization (SSD) system combined with passive vapor barriers. The SSD systems will be owned and maintained by the HOA. No structures may be occupied until the active SSD system and vapor barriers are installed, and the SSD system is operating.

Inspections:	Frequency
1. Sub-slab depressurization systems	Annually
Monitoring:	
1. No Monitoring	-
Maintenance:	
1. Sub-slab depressurization systems	As needed
Reporting:	
1. Sub-slab depressurization systems Inspection Results	Annual
2. Periodic Review Report	Annual

Further descriptions of the above requirements are provided in detail in the latter sections of this SMP.

1 INTRODUCTION

1.1 GENERAL

This Interim Site Management Plan (SMP) is a required element of the remedial program for the former TransTechnology Corporation (TTC) facility in Glen Head[1], New York (hereinafter referred to as the "Site"; Figure 1). The Site is currently in the New York State (NYS) Inactive Hazardous Waste Disposal Site Remedial Program (Site No. 1-30-101), which is administered by New York State Department of Environmental Conservation (NYSDEC). Most of the contamination previously present at the Site has been removed under NYSDEC oversight; however, there is a small amount of affected soil remaining in difficult to access locations (less than 0.7-percent or 7/1000 of the entire property). This area has been cleaned to the depth of 7 feet below grade which is below the foundation, footing, and vapor barrier of the planned residential structures. To ensure the protection of human health for all the occupants including construction workers and future residence, this plan provides instructions in the unlikely event that additional areas of suspected contamination are found.

Breeze-Eastern Corporation[2] (now known as Breeze-Eastern LLC) entered an Order on Consent (Index #WI 0913-02-02) in June 2006 with the NYSDEC to remediate the Site. A figure showing the Site location and boundaries is provided in Figure 2. The boundaries of the Site are more fully described[3] in the metes and bounds that is part of the Environmental Easement provided in Appendix A and the site legal description provided in Appendix C, in descriptions of the Site presented below, and on figures included with this plan.

After completion of the remedial work, some contamination was left at this Site, which is hereafter referred to as "remaining contamination". Institutional and Engineering Controls (ICs and ECs) have been incorporated into the Site remedy to control exposure to remaining contamination to ensure protection of public health and the environment. An Environmental Easement granted to the NYSDEC June 2, 2022, and recorded with the Nassau County Clerk on July 21, 2022, requires compliance with this SMP and all ECs and ICs placed on the Site (Appendix A).

This SMP was prepared to manage remaining contamination at the Site until the Environmental Easement is extinguished in accordance with ECL Article 71, Title 36. This plan has been approved by the NYSDEC, and compliance with this plan is required by the grantor of the Environmental Easement and the grantor's successors and assigns. This SMP may only be revised with the approval of the NYSDEC.

It is important to note that:

- This SMP details the site-specific implementation procedures that are required by the Environmental Easement. Failure to properly implement the SMP is a violation of the Environmental Easement, which is grounds for revocation of the Certificate of Completion (COC);
- Failure to comply with this SMP is also a violation of Environmental Conservation Law, Title 6 New York Codes, Rules, and regulations (NYCRR) Part 375 and the Order on Consent for the Site, and thereby subject to applicable penalties.

All reports associated with the Site can be viewed by contacting the NYSDEC or its successor agency managing environmental issues in New York State. A list of contacts for persons involved with the Site is provided in Appendix B of this SMP.

This SMP was prepared by WSP USA Inc. (WSP), on behalf of Breeze-Eastern LLC, in accordance with the requirements of the NYSDEC's *DER-10 Technical Guidance for Site Investigation and Remediation*, dated May 2010, and the guidelines provided by the NYSDEC. This SMP addresses the means for implementing the ICs and/or ECs that are required by the Environmental Easement for the Site.

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[1] Glen Head is an unincorporated area in the Town of Oyster Bay, New York.

[2] TransTechnology Corporation changed its name to Breeze-Eastern in 2006.

[3] The metes and bounds detail the boundaries of the entire Site; Parcel A, which is designated for Residential Land use; and Parcel B (i.e., the balance of the property), which is designated for Restricted Residential Land use, are each depicted and described on Figure 5.

1.2 REVISIONS

Revisions to this plan will be proposed in writing to the NYSDEC's project manager. Revisions will be necessary upon, but not limited to, the following occurring: a change in media monitoring requirements, upgrades to or shut-down of a remedial system, post-remedial removal of contaminated sediment or soil, or other significant change to the Site conditions. In accordance with the Environmental Easement for the Site, the NYSDEC will provide a notice of any approved changes to the SMP and append these notices to the SMP that is retained in its files.

1.3 NOTIFICATIONS

Notifications will be submitted by the property owner to the NYSDEC, as needed, in accordance with NYSDEC's DER-10 for the following reasons:

- 60-day advance notice of any proposed changes in Site use that are required under the terms of the Order on Consent, 6 NYCRR Part 375 and/or Environmental Conservation Law.
- 7-day advance notice of any field activity associated with the remedial program.
- 15-day advance notice of any proposed ground-intrusive activity pursuant to the Excavation Work Plan (EWP).
- Notice within 48-hours of any damage or defect to the foundation, structures or EC that reduces or has the potential to reduce the effectiveness of an EC, and likewise, any action to be taken to mitigate the damage or defect.
- Verbal notice by noon of the following day of any emergency, such as a fire; flood; or earthquake that reduces or has the potential to reduce the effectiveness of ECs in place at the Site, with written confirmation within 7 days that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.
- Follow-up status reports on actions taken to respond to any emergency event requiring ongoing responsive action submitted to the NYSDEC within 45 days describing and documenting actions taken to restore the effectiveness of the ECs.
- Any change in the ownership of the Site or the responsibility for implementing this SMP will include the following notifications:
  - At least 60 days prior to the change, the NYSDEC will be notified in writing of the proposed change. This will include a certification that the prospective purchaser/Remedial Party[4] has been provided with a copy of the Order on Consent and all approved work plans and reports, including this SMP.
  - Within 15 days after the transfer of all or part of the Site, the new owner's name, contact representative, and contact information will be confirmed in writing to the NYSDEC.

Table 1-1 on the following page includes contact information for the above notification. The information on this table will be updated as necessary to provide accurate contact information. A full listing of Site-related contact information is provided in Appendix B.

Table 1.1: Notifications*

Name	**Contact Information**
NYSDEC Site Contact: Ms. Tara Rutland	(518) 402-9621; tara.rutland@dec.ny.gov
New York State Department of Health (NYSDOH) Site Contact: Ms. Charlotte Bethoney	(518) 402-7860; charlotte.bethoney@health.ny.gov
NYSDEC Regional Environmental Engineer: Mr. Walter Parish	(631) 444-0240; walter.parish@dec.ny.gov

[4] Breeze-Eastern LLC is the owner and Remedial Party for the former TransTechnology Corporation site in Glen Head, New York.

Name	Contact Information
NYSDEC Site Control Officer: Mr. Kelly Lewandowski	(518) 402-9543; kelly.lewandowski@dec.ny.gov

* Note: Notifications are subject to change and will be updated as necessary.

2 PREVIOUS INVESTIGATIONS AND REMEDIAL ACTIONS

2.1 SITE LOCATION AND DESCRIPTION

The Site is located at 1 Robert Lane in the City of Glen Head, Nassau County, New York, in the northwest portion of Long Island (Figure 1). The Site is an approximately 7.75-acre area and is bounded by a county-owned storm water management structure to the north, the Sea Cliff Water District water storage tower and commercial buildings along Glen Head Road bounding the Site to the south, the Long Island Railroad (LIRR) right-of-way to the east, and a residential neighborhood (Todd Estates) to the west (Figure 2). The boundaries of the Site, including the metes and bounds, are more fully described in the Environmental Easement in Appendix A. The owner of the Site parcel at the time of issuance of this SMP is Breeze-Eastern LLC.

The Site is adjoined by commercial businesses on the south side of Glen Head Road, including several former dry cleaning facilities that are under investigation by the NYSDEC for releases of the solvent tetrachloroethene (PCE), which has impacted the regional groundwater (Figure 2). Affected groundwater containing PCE is present beneath the former TTC facility. The significance of the regional plume is discussed in detail below.

2.2 PHYSICAL SETTING

2.2.1 LAND USE

The Site formerly (following redevelopment) consisted of a 96,000-square foot main building (labeled as [joined] Buildings E, F, G, H, and I) where most of the manufacturing activities occurred; and several smaller one-story buildings at the south end of the Site (labeled as Buildings A through D; Figure 3) that were used for research and development or other supporting operations. Access to the Site was through a paved entranceway west of the former main building (connecting with Dumond Street) with additional paved parking areas at the north end of the Site and between the main and outbuildings. The Site buildings were razed in 2016 as part of the post-closure[5],[6] redevelopment activities. The Site is currently vacant.

2.2.2 GEOLOGY

Soil borings and monitoring well boreholes installed by Breeze-Eastern's consultants before and during the Remedial Investigation (RI) revealed generally coarse-grained sand and gravel deposits with occasional silt interbeds (particularly deeper than 60 feet below ground surface [bgs]) extending to a depth of at least 150 feet bgs. The deposits fine downward with silt and sand (and occasional seams of clay) dominating the intervals below 150 feet bgs. The soils are consistent with the descriptions of the Upper Glacial and the underlying Magothy Formation.

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[5] The soil remediation at the site, designated by the NYSDEC as Operable Unit No. 1 (OU-1), was completed in 2012 and detailed in the Operable Unit No. 1 Remedial Action Construction Completion Report (CCR), dated November 9, 2015. The NYSDEC approved the OU-1 CCR in a letter, dated February 9, 2016. The approval acknowledged the completion (and closure) of the OU-1 soil remedial at the site.

[6] The historical configuration of the Site was modified between 2016 and 2019 as part of the redevelopment activities that occurred following the completion of the OU-1 remediation. Those activities included the demolition of all site buildings, the removal of the concrete floors and building footers, the onsite portions of the asphalt, and all the sub-surface drainage structures (cesspools, leach pits, and catch basins). See the Subsurface Drainage Structure Abandonment and Soil Remediation Report, dated July 22, 2019, for additional information.

2.2.3 HYDROGEOLOGY

Groundwater at the Site was encountered between 110 and 125 feet bgs in what is likely the transition between the Upper Glacial and Magothy Formations, which underlie the Site. The groundwater flow direction and gradient, based on elevation data collected during the RI, is to the northwest (consistent with the regional flow) with a relatively flat gradient of between 0.002 and 0.006 (Figure 4).

2.3 INVESTIGATION AND REMEDIAL HISTORY

The following narrative provides a timeline and summary of the available project records to document key investigative and remedial milestones for the Site. Full titles for each of the reports referenced below are provided in Section 8.0 - References.

Chlorinated solvents were first detected at the Site in 1992 during a hydrogeological assessment performed by Environmental Resources Management (ERM)[7] associated with the removal of an underground fuel oil tank. No fuel oil was detected at the water table (reported by ERM at about 110 feet bgs); however, concentrations of trichloroethene (TCE; 44 micrograms per liter [µg/l]) and PCE (2.5 µg/l), and several other chlorinated volatile organic compounds (VOCs) were detected as dissolved constituents in the groundwater. Follow-up investigations[8] performed by Eder Associates in 1993, Conestoga-Rovers and Associates in 1996, and Geomatrix in 2001 and 2002 revealed two areas of affected groundwater: a relatively shallow (i.e., the upper 10 to 20 feet of the water-bearing zone) TCE-dominated plume that appeared to extend from the east-central portion of the former TTC facility north-northwest towards the property line; and a second, larger PCE-dominated plume in the southern portion of the Site (away from the historical manufacturing areas of the facility) that appeared to originate from an offsite source (designated as the regional plume). Soil and sediment samples collected from onsite subsurface drainage structures confirmed the presence of chlorinated VOCs as well as metals and polycyclic aromatic hydrocarbons (PAHs).

The NYSDEC listed the TTC Site as a Class 2 Inactive Hazardous Waste Disposal Site and conducted separate investigations (detailed in the 2007 *Site Characterization Report, Glen Head Groundwater Plume)* into the release of PCE from dry cleaning facilities near the TTC Site. An Order on Consent (Index #WI-0913-02-02) was filed with the Nassau County Clerk's Office by NYSDEC in May 2002 requiring that TTC undertake remedial work at the Site beginning with the submission of a remedial investigation and feasibility study (RI/FS) Work Plan.

Geomatrix completed the RI/FS process for the affected soil at the Site, designated[9] as Operable Unit No. 1 (OU-1), in 2005 and, in 2006, a Proposed Remedial Action Plan (PRAP). The NYSDEC approved the remedial approach and, in June 2006, issued a Record of Decision[10] (ROD) for affected soil at the site (i.e., OU-1). The ROD required Breeze-Eastern to prepare a Remedial Design and Remedial Action (RD/RA) Work Plan for implementation of the OU-1 remedy, which was completed by Geomatrix in 2007. The FS and RD/RA did not include Operable Unit No. 2 (OU-2), which required additional investigation[11] to evaluate the potential offsite extent of affected groundwater and soil vapor.

2.4 REMEDIAL ACTION OBJECTIVES

The Remediation Goals (RGs)[12] for the Site as listed in the June 2006 OU-1 ROD were to eliminate, to the extent practicable:

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[7] Environmental Resources Management of Melville, New York

[8] Eder Associates Consulting Engineers, P.C., of Locust Valley, New York; Conestoga-Rovers and Associates of Buffalo, New York; and Geomatrix Engineering LLC, of Amherst, New York. Geomatrix Engineering, also known as Geomatrix Consultants, Inc., was acquired by AMEC becoming AMEC-Geomatrix, Inc. For discussion purposes, all three entities are referred to as Geomatrix

[9] The NYSDEC, in a letter dated July 25, 2004, established two operable units at the site: Operable Unit No.1 for affected soil at the facility, and Operable Unit No. 2 for groundwater (and, later, soil gas) at the site.

[10] Record of Decision, TransTechnology, Operable Unit No. 1, Glen Head, Nassau County, New York, Site Number 1-30-101, dated June 2006.

[11] The results of the groundwater investigation conducted are summarized in the April 2018 Supplemental Remedial Investigation Report for OU-2, which was approved by the NYSDEC on October 14, 2020. The *Operable Unit No. 2 Supplemental Investigation Work Plan* was submitted to the NYSDEC on September 1, 2022, and is under review by the Department. The supplemental investigation will inform the groundwater feasibility study planned for late 2022 or early 2023

[12] The ROD uses the term "Remediation Goals" which is considered synonymous with the term "Remedial Action Objectives", the term used in the SMP template.

- Exposures of persons at or around the Site to VOCs and metals in soil, as well as VOCs in soil vapor, ambient air, and indoor air
- The release of contaminants from soil into groundwater that may create exceedances of groundwater quality standards; and,
- The release of contaminants from subsurface soil in cesspools and leaching pools into indoor air and ambient air through soil vapor

Further, the remediation goals for the Site included attaining to the extent practicable:

- NYSDEC Technical and Administrative Guidance Memorandum (TAGM) 4046 Recommended Soil Cleanup Objectives (SCOs)[13] and/or representative soil background concentrations arrived at utilizing the statistical methodology from NYSDEC Technical Guidance DER-10 for both soil and subsurface soil.

The Site was remediated as part of the OU-1 activities to the (site-specific) Restricted Residential land use category intended for the property[14]; however, Breeze-Eastern has (with the concurrence of the NYSDEC and New York State Department of Health [NYSDOH]) reclassified a portion of the Site from Restricted Residential land use to Residential land use so that single family homes can be constructed during Site redevelopment. Results for samples collected within this reclassification zone, designated as Parcel A, were compared to the more stringent Residential Protection of Public Health SCOs, rather than the Restricted Residential Protection of Public Health SCOs used for the balance of the Site (i.e., in Parcel B, as depicted by the stippled area on Figure 5). The 2.75-acre Parcel A, depicted by the diagonally-hashed area on Figure 5, is provisionally-zoned for single family home construction, pending final approval by Nassau County. The ICs and ECs for both Parcels A and B will be the responsibility of the HOA, which will be established before structures on the property are occupied.

The legal descriptions for Parcels A and B, and the overall property are presented as part of the Environmental Easement (Appendix A).

2.5 REMAINING CONTAMINATION

The remedial activities addressed (through excavation and offsite disposal) most contaminated soil; however, two areas with Remaining Contamination were not removed because of structural concerns regarding the nearby LIRR and the main building, or depth in the case of cesspool C-6. The two areas of metals and TCE-affected soil are depicted on Figure 6 and described below.

Long Island Railroad Area

WSP removed soil from three excavations along the LIRR (collectively designated as the Long Island Railroad Area) where soil containing chemicals of concern exceeding the site-specific SCOs remains. The excavations were advanced from the surface to a depth of approximately 7 feet, as detailed below (i.e., the remaining affected soil is 7 feet or deeper). The areas are:

- SURF-15 – a 15-foot-wide by 43-foot-long area of affected soil located directly adjacent to the eastern property line encompassing leach pit LP-1 (south end of excavation); confirmation soil samples collected from the base of the excavation at approximately 7 feet bgs contained TCE (934 micrograms per kilogram [µg/kg]) at a concentration that was above the site-specific surface SCO of 700 µg/kg. Soil at a depth of less than 7 feet bgs in this area (i.e., the clean backfill; see below) is not part of the Remaining Contamination.
- SURF-22 – a 17-foot-wide by 41-foot-long area of affected soil located along the eastern property line encompassing leach pit LP-2 (north end of excavation area) and most of cesspool C-5 (south end of excavation area); confirmation soil samples collected from the base of the excavation at approximately 7 feet bgs contained chromium (20.4 to 31.5

[13] The NYSDEC's TAGM 4046 was superseded in 2006 by the regulations promulgated in 6 NYCRR Part 375-6. Site-specific SCOs for OU-1 were subsequently developed (with NYSDEC approval) by selecting the lower of the two values (and thereby creating a conservative and more protective evaluation criterion) between the original TAGM 4046 criteria and those listed in 6 NYCRR Part 375, Table 6.8(b). The site-specific SCOs used for soil work conducted during OU-1 are presented in Tables 1 and 2. Work conducted after the completion of the Operable Unit No. 1 Remedial Activity Construction Completion Report, dated November 9, 2015, and its subsequent approval by the NYSDEC on February 9, 2016 (i.e., post-closure work), use Part 375 Residential and Restricted Residential end land use SCOs, depending on the location, for evaluating soil at the Site.

[14] The Environmental Easement for Site includes both Parcels A and B, despite the differences in the allowed land use.

milligrams per kilogram [mg/kg]) at concentrations slightly above the site-specific surface SCO of 19.1 mg/kg. Soil at a depth of less than 7 feet bgs in this area (i.e., the clean backfill) is not part of the Remaining Contamination.

— B-5 Excavation – a 16-foot-wide by 22-foot-long area of affected soil located directly adjacent the eastern property line between surface soil excavations SURF-15 and SURF-22; confirmation soil samples collected from sidewalls of the excavation at approximately 10 and 15 feet bgs contained TCE (775 to 6,920 µg/kg) at concentrations above the site-specific subsurface SCO of 700 µg/kg. Soil at a depth of less than 10 feet bgs in this area (i.e., the clean backfill) is not part of the Remaining Contamination.

Deep Soil in Cesspool C-6 Area

The deep soil in the vicinity of Cesspool C-6 that still contains chromium and copper above the site-specific SCOs is described below:

— Cesspool C-6 – a 10-foot-diameter subsurface drainage structure located directly east of Building G; 2011 confirmation soil samples recovered from beneath the structure at approximately 34 feet bgs (the cesspool did not have a concrete bottom and excavation proceeded approximately 2 feet below the sidewalls of the structure) contained the metals chromium (184 mg/kg) and copper (247 mg/kg) at concentrations above the respective site-specific surface SCOs of 19.1 mg/kg and 119 mg/kg. Subsequent activities at the Site in 2018 included removing debris that had collected in the structure following the 2011 remediation. No additional remediation or confirmation soil samples were collected from the interior of the structure. The cesspool was deconstructed and backfilled with ¾-inch bluestone gravel following the approved engineering procedures[15] on October 2, 2018. The soil at a depth of less than 34 feet bgs in this area (i.e., the bluestone gravel and clean backfill) is not part of the Remaining Contamination. It is highly unlikely that any residential development activities would disturb soil below this depth.

Both surface excavations and the B-5 excavation area were backfilled using clean fill (see the *Construction Completion Report - Operable Unit No. 1*[16] for a description of the backfilling activities). No active utilities were located within either area. Cesspool C-6 was abandoned as part of post-closure activities that were performed as part of the Site redevelopment. Coordinates for the areas with residual contamination are presented on Figure 6. Controls designed to address potential exposure to these residual soils are presented below.

2.6 GROUNDWATER

Groundwater is being investigated as OU-2, separate from soil (OU-1). Groundwater is first present at a depth of approximately 110 feet bgs and contains chlorinated VOCs at concentrations above the NYSDEC's Division of Water Technical and Operational Guidance Series (TOGS 1.1.1), dated June 1998 with subsequent addendums. The distribution of VOCs in groundwater, which includes offsite sources from dry cleaners in the area being investigated separately by NYSDEC (i.e., the regional plume), covers a substantive portion of the property. Figure 7 depicts the local and regional plumes.

No remedy has been developed for the Site groundwater at the time this SMP was prepared and, thus, the affected groundwater from both the local and regional plumes depicted on Figure 7 remains. Regardless of the ultimate remedy selected, it is unlikely, given the nature and extent of the regional plume, that the water quality beneath the Site will be suitable for potable uses in the foreseeable future. Glen Head already prohibits the installation of water wells for potable use within the city limits; however, an institutional control (i.e., via the Environmental Easement) is warranted to ensure that wells are not installed at the Site in the future for purposes other than monitoring and/or remediation. The preliminary ICs for groundwater have been included in this SMP and detailed in Section 3 below.

[15] Cesspool C-6, along with all the identified subsurface drainage structures at the Site, were deconstructed and abandoned in accordance with the engineering specifications provided to the Town of Oyster Bay on January 3, 2017. The bluestone gravel used for backfilling was virgin rock obtained from the Azzil Granite Materials, LLC, (Whitehall Quarry), a NYSDEC-permitted facility (#51058) in Whitehall, New York. See the Subsurface Drainage Structure Abandonment and Soil Remediation Report, dated July 22, 2019, for additional information.

[16] This report was originally submitted to the NYSDEC as a draft under the title Final Engineering Report – Operable Unit No. 1 and has since been retitled.

WSP has monitored groundwater in selected onsite wells on a semiannual basis since August 2013 and the VOC concentrations have generally decreased, up to 99 percent for select compounds, as compared to the concentrations detected in the 1990s. The groundwater monitoring data[17] clearly show that the concentrations are attenuating over time.

2.7 SOIL VAPOR

Detectable concentrations of chlorinated VOCs (including PCE and TCE) from both onsite and offsite sources are present in the soil gas beneath the Site and, before they were demolished, in indoor air samples collected from the main and outbuildings.

[17] See the Periodic Groundwater Monitoring Results Report, dated July 23, 2020, for additional information.

3 INSTITUTIONAL AND ENGINEERING CONTROL PLAN

3.1 GENERAL

Remaining Contamination exists at the Site and, thus, ICs and ECs are required to protect human health and the environment. This IC/EC Plan describes the procedures for the implementation and management of all IC/ECs at the Site. The IC/EC Plan is one component of the SMP and is subject to revision by the NYSDEC.

This plan provides:

- A description of all IC/ECs on the Site;
- The basic implementation and intended role of each IC/EC;
- A description of the key components of the ICs set forth in the Environmental Easement;
- A description of the controls to be evaluated during each required inspection and periodic review;
- A description of plans and procedures to be followed for implementation of IC/ECs, such as the implementation of the EWP (as provided in Appendix D) for the proper handling of remaining contamination that may be disturbed during maintenance or redevelopment work on the Site;
- Compliance of all structures with the identified ICs and ECs will be the responsibility of the Site owner until the HOA is established (i.e., before any structures are occupied); the responsibility for compliance with the ICs and ECs will shift to the HOA once it has been established; and,
- Any other provisions necessary to identify or establish methods for implementing the IC/ECs required by the Site remedy, as determined by the NYSDEC.

3.2 INSTITUTIONAL CONTROLS

Several ICs has been developed for the Site to: (1) implement, maintain, and monitor EC systems; (2) manage future disturbance of the Remaining Contamination and, if identified, Discovered Contamination at the Site by providing instructions to follow in the event these areas are excavated; and (3) limit the use and development of Parcel A to "Residential" uses only and Parcel B to "Restricted Residential" uses only, as defined by 6 NYCRR Part 375-1.8(g)(2). The IC boundaries are shown on Figure 5. Adherence to these ICs on the Site is required by the Environmental Easement implemented under this SMP. The ICs are:

- Compliance with the Environmental Easement and this SMP by the Remedial Party and the Remedial Party's successors and assigns.
- All ECs must be operated and maintained as specified in this SMP.
- All ECs on the property must be inspected at a frequency and in a manner specified in the SMP.
- Data and information pertinent to Site management of the property must be reported at the frequency and in a manner specified in this SMP.
- The property may only be used for Residential and Restricted Residential uses provided that the long-term ECs/ICs included in this SMP are employed.
- Only land uses specified in the environmental easement are permitted.
- Parcel B may not be used for a higher level of use, such as "residential" use (single family homes) or "unrestricted" use (agricultural), without amending the Environmental Easement, as approved by the NYSDEC.
- Parcel A may not be used for "unrestricted" use.
- All future activities on the property that will disturb soils with Remaining Contamination or soils that are suspected of having Discovered Contamination must be conducted in accordance with this SMP, including the EWP in Appendix D.

- The use of the groundwater underlying the property is prohibited without treatment rendering it safe for its intended use and pre-approval by NYSDEC.
- Vapor mitigation systems must be incorporated into the design and construction for any buildings developed on the property, unless otherwise approved by NYSDEC.
- Vegetable gardens and farming are prohibited, unless otherwise approved by NYSDEC.
- The Site owner will submit to NYSDEC a written statement that certifies, under penalty of perjury, that: (1) controls employed at the property are unchanged from the previous certification or that any changes to the controls were approved by the NYSDEC; and (2) nothing has occurred that impairs the ability of the controls to protect public health and environment or that constitute a violation or failure to comply with the SMP. This certification shall be submitted annually using the attached inspection reporting form (Appendix E) and will be made by a qualified environmental professional, as defined in 6 NYCRR 375-1.2(ak). The NYSDEC retains the right to access the property to evaluate the continued maintenance of all controls.

Institutional Controls identified in the Environmental Easement may not be discontinued without an amendment to or extinguishment of the Environmental Easement. Compliance with the ICs will be the responsibility of the Site owner until the HOA is established (the HOA must be established before any structures are occupied) and, thereafter, these responsibilities will transfer to the HOA.

3.3 ENGINEERING CONTROLS

Engineering controls will be required in four instances:

1. when excavation activities disturb soil with Remaining Contamination
2. when soil that exhibits properties of Discovered Contamination is identified
3. when soil from Parcel B is used as fill material on Parcel A
4. when a building is constructed on the Site (vapor mitigation)

The purpose of the ECs for the first three activities is to protect workers who may contact contaminated soil and to ensure that the soil is properly characterized, managed, and, if warranted, disposed of in accordance with applicable regulations. Management of excavated soil is addressed in the EWP, which is presented in Appendix D and discussed below. The purpose of the ECs for the fourth activity is to manage VOCs in soil gas in the vicinity of new buildings constructed at the Site (the existing buildings were demolished). Potential indoor air impacts will be addressed using vapor mitigation systems (comparable to radon gas systems), which will be integrated into any new building design. The design of the vapor mitigation systems is described in Section 3.3.3.

3.3.1 SOIL

Engineering controls to mitigate direct contact on the surface with the Remaining Contamination at the TTC Site are not required: all known surface contamination has been removed to the site-specific SCOs (established to be protective of human health), and, by extension, Part 375 SCOs. The depths of the affected soils in the identified areas, 7 feet bgs for SURF-15 and SURF 22, 10 feet bgs for the B-5 excavation area, and greater than 34 feet for the cesspool C-6[18], and the amount of surface fill above these areas are well above the minimum requirements for an engineered surface cap or cover (typically 24 inches), as defined in DER-10 (Figure 6). The areas[19] along the LIRR are within a zone that could potentially be excavated during Site redevelopment, utility installation, or other onsite excavation activity (i.e., the excavations could extend to or below 7 feet in depth). The current development plan includes removing soil from this area, likely using sloped excavations to mitigate the need for shoring. Soils excavated in this area (and, if for any reason the cesspool C-6 area is excavated below 34 feet) should be managed using the EWP.

Although not anticipated, the potential also exists that, during construction, demolition, or utility repair work on the Site, soil that is suspected of containing chemicals of concern above the Part 375 SCOs for Restricted Residential (Parcel B) or

[18] Cesspool C-6 was abandoned in 2018 in accordance with the engineering specifications provided to the Town of Oyster Bay on January 3, 2017.

[19] The affected soil beneath cesspool C-6 area is deep (greater than 34 feet bgs) and is unlikely to be disturbed by any construction activity.

Residential (Parcel A) may be identified. For example, the current development includes the installation of over 100 dry wells. Soil generated during the dry well activities, as defined above, may be considered to have Discovered Contamination requiring excavation in accordance with the EWP. Any excavation at the Site that could potentially disturb soil with Remaining Contamination or Discovered Contamination must be conducted in accordance with the EWP (Appendix D). Institutional controls will also be established to supplement these ECs for soil that prohibit disturbance of the Remaining Contamination locations except as specified by the requirements of the EWP.

All work conducted pursuant to the EWP[20] must also be conducted in accordance with the procedures set forth in a Health and Safety Plan (HASP) and Community Air Monitoring Plan (CAMP) prepared for the Site. An approved HASP that provides specific information regarding the known hazards at the Site is included in Appendix F. The approved CAMP is presented in Appendix G. The HASP was prepared in current compliance with DER-10, and 29 Code of Federal Regulations (CFR) 1910, 29 CFR 1926, and other applicable federal, state, and local regulations and includes the following elements[21]:

1. Organizational Structure
2. Job Hazard Analysis
3. Site Control
4. Training Program
5. Medical Surveillance Requirements
6. Personal Protective Equipment
7. Exposure Monitoring
8. Thermal Stress
9. Spill Containment Program
10. Decontamination Program
11. Emergency Response Plan
12. Standard Operating Procedures

The HASP specifies that the Site Health and Safety Officer (SHSO) is responsible for ensuring that the plan is adhered to by all field personnel under his or her direction. The SHSO ensures there is a "competent person" overseeing the excavation, as defined by the Occupational Safety and Health Administration (OSHA) regulations (29 CFR 1926.32(f)). If there is any question whether OSHA applies or a CAMP is required, the NYSDEC should be contacted for guidance.

Based on future changes to state and federal health and safety requirements, and specific methods employed by future contractors, the HASP and CAMP (updated, if necessary) will be submitted with the notification provided in Section D-1 of the EWP. Any intrusive construction work in areas of Remaining Contamination or Discovered Contamination will be performed in compliance with the EWP, HASP, and CAMP, and will be included in the inspection and certification reports submitted under this SMP (Section 6). Areas outside the areas of Remaining Contamination and Discovered Contamination do not need to comply with the EWP, HASP, and CAMP. In other words, only areas with known or suspected contamination need to comply with these various work plans.

The Site owner and associated parties preparing the remedial documents submitted to the state, and parties performing this work, are responsible for the safe performance of all intrusive work, the structural integrity of excavations, proper disposal of any removed and contaminated media, control of storm water runoff from excavated areas, and for structures that may be affected by excavations (such as building foundations and railroad embankments). The Site owner will ensure that Site development activities will not interfere with, or otherwise impair or compromise, the ECs described in this SMP.

If soil from Parcel B is to be used for fill material in Parcel A, then the soil must be characterized in accordance with Part 375-6.7(d) and DER-10 Section 5.4(10), and meet the applicable Part 375 Residential Protection of Health SCOs for Parcel A. The test results must be provided to NYSDEC before such use.

[20] Other contractors performing work at the site under the EWP requirements shall prepare their own site-specific health and safety plans.

[21] The following three elements of health and safety plans specified in the Occupational Safety and Health Administration regulation are not expected to be applicable to site: confined space entry, hot work, and lockout/tagout programs.

3.3.2 SOIL VAPOR

Chlorinated VOCs, including TCE, PCE, and their dechlorination breakdown products, have been detected in soil gas samples in several locations at the Site. The VOCs in the soil gas are due to partitioning from the affected soil and sediment at the Site and, based on the presence of PCE and the coincidence of the highest TCE concentrations, the underlying groundwater. The OU-1 remedial activities have reduced the amount of chlorinated VOC-affected soil at the Site, and it is expected that the VOC concentrations in soil gas will decrease over time. However, as a precaution, the potential presence of VOCs in soil gas will be mitigated in accordance with the IC/ECs described below.

To address the potential for these vapors to infiltrate into buildings on either Parcel A or Parcel B, new construction at the Site will require an active sub-slab depressurization (SSD) system combined with passive barriers. The SSD system is a vapor interception technology that works by venting the sub-slab (using sealed suction points piped to a fan or blower) creating a negative pressure below the basement floor or slab. The pressure differential between the indoor air and below the concrete slab of the basement floor reverses the normal pressure gradient (i.e., indoor air flows out instead of the soil vapor flowing into the building) preventing vapors from passing from the subsurface into the building. These systems, according to the NYSDOH, particularly when combined with a passive (vapor) barrier system, are the best available technology for mitigating the infiltration of vapors into a building's interior.

A work plan will be developed and submitted to the NYSDEC and NYSDOH for approval prior to installing each mitigation system. This work plan will be developed in accordance with the NYSDOH's Guidance for Evaluating Vapor Intrusion in the State of New York, dated October 2006 (with revisions in 2017), or other future documents that may supersede that guidance. Design of the mitigation systems will be specific to the size and configuration of the new construction, but must have the following common components, unless an alternative design is approved by NYSDOH or NYSDEC:

- coarse aggregate zone - typically 6 to 8 inches of crushed stone (American Association of State Highway and Transportation Officials [AASHTO] #57, or equivalent) placed beneath the basement or concrete slab
- plenum box – a subgrade structure that receives vapors from various points and then is directed to a single discharge location in a relatively remote location, such as above the building roof line; most structures will not require a plenum box
- perforated piping for vapor collection within the aggregate zone below the building slab – typically polyvinyl chloride (PVC) pipe sized and spaced according to the footprint of the new building
- solid piping for venting vapors to the exterior of the structure
- in-line fan or blower

The aggregate, plenum box (if necessary), and perforated collection pipes will be installed within the building footprint prior to installation of the basement or slab on-grade; these items will not be visible after the building is constructed. The in-line fan and conveyance piping will be installed in coordination with construction of the building superstructure. The SSD systems will be designed to ensure a minimum sub-slab negative pressure of -0.001 inch of water column (i.e., 0.25 Pascal) at the area that is most distant from the extraction point. Digital manometers will be installed to monitor the sub-slab vacuum response. Passive systems installed to supplement the SSD will use vapor retarding materials, such as polyethylene or polyolefin sheeting, spray-on vapor products, such as Liquid Boot®, or other appropriate technology installed during construction of the basement or slab on-grade. Appropriate quality assurance/quality control field procedures will be followed implemented after the vapor barrier installation to ensure the competency of the vapor barrier. The SSD will be tested to ensure that the system is operating effectively and as designed.

The HOA will be responsible for ensuring that the SSD systems remain active and operational in structures at the Site. The active SSD system(s) will not be discontinued unless prior written approval is granted by the NYSDEC and the NYSDOH. If monitoring data indicates that the SSD system may no longer be required, a proposal to discontinue the SSD system will be submitted by the remedial party to the NYSDEC and NYSDOH.

3.3.3 GROUNDWATER

No ECs are warranted for the Site groundwater at the time this SMP was prepared. Site groundwater is unlikely to be disturbed by any redevelopment activities (the groundwater interface is more than 100 feet bgs), is not currently used for any known purpose other than monitoring, and future well installations will be addressed using ICs (discussed below). Additional

controls developed as part of the pending OU-2 Feasibility Study, if any, will be included in the final SMP. The final SMP will be developed for NYSDEC review and approval after the remedy for OU-2 is designed and implemented (if appropriate).

4 MONITORING AND SAMPLING PLAN

The remedy for OU-2 has not been determined. Groundwater monitoring or remediation, if any, will be determined in the future as part of the OU-2 ROD. Any additional ICs or ECs associated with the OU-2 remedy will be incorporated into the final SMP for the Site. No performance monitoring for the SSD or other vapor control systems is planned other than that required for the annual Site inspections (manometer pressure measurements), which are detailed below. Compliance with the required OU-1 inspections will be the responsibility of the Site owner until the HOA is established (the HOA must be established before any structures are occupied). The responsibility for the required inspections will transfer to the HOA upon its establishment.

4.1 INSPECTIONS AND NOTIFICATIONS

The SSD systems and vapor barriers associated with new construction are the only components of the IC/EC Plan requiring inspection for OU-1. The SSD and vapor barrier inspections[22] are planned to coincide with the required Site-wide annual inspections detailed below. The inspections will determine and document that:

- the SSD systems and vapor barriers continue to provide negative pressure beneath the building slabs
- the Site conditions comply with requirements of this SMP and the Environmental Easement
- any changes or modifications needed or completed for the SSD system(s) are identified
- visible breaches in the vapor barrier, such as new penetrations into basement floors, are identified and sealed

Inspections associated with the SSD systems and vapor barriers will be conducted in accordance with the Operations and Maintenance Plan (Section 5.0) for the SSD systems and vapor barriers installed as part of new construction at the Site. The annual reporting and other reporting requirements are outlined in Section 3.1 above, and in Section 7 below.

4.1.1 SITE-WIDE INSPECTION

Site-wide inspections will be performed at a minimum of once a year. Modification to the frequency or duration of the inspections will require approval from the NYSDEC. Site-wide inspections will also be performed after all severe weather conditions that may affect ECs or monitoring devices. During these inspections, an inspection form will be completed as provided in Appendix E – Site Management Plan Annual Reporting Form. The form will compile sufficient information to assess the following:

- compliance with all ICs, including Site usage;
- an evaluation of the condition and continued effectiveness of ECs;
- the general Site conditions at the time of the inspection, including the areas where contamination remains;
- the Site management activities being conducted including, where appropriate, confirmation sampling and a health and safety inspection;
- confirm that Site records are up to date; and
- compliance with permits and schedules included in the Operations and Maintenance Plan.

Inspections of all remedial components installed at the Site will be conducted. A comprehensive (Site-wide) inspection will be conducted and documented according to the SMP schedule, regardless of the frequency of the Periodic Review Report (PRR). The inspections will determine and document the following:

- whether ECs continue to perform as designed;
- if these controls continue to be protective of human health and the environment;

[22] The vapor barrier inspection will involve an inspection of the integrity of the concrete floor, walls, and foundation. The actual barrier will be located under the floor and, thus, not visible to the inspector.

- compliance with requirements of this SMP and the Environmental Easement;
- achievement of remedial performance criteria; and
- if Site records are complete and up to date.

Reporting requirements are outlined in Section 7.0 of this plan.

Inspections will also be performed in the event of an emergency. If an emergency, such as a natural disaster or an unforeseen failure of any of the ECs occurs that reduces or has the potential to reduce the effectiveness of ECs in place at the Site, verbal notice to the NYSDEC must be given by noon of the following day. In addition, an inspection of the Site will be conducted within 5 days of the event to verify the effectiveness of the IC/ECs implemented at the Site by a qualified environmental professional, as determined by the NYSDEC. Written confirmation must be provided to the NYSDEC within 7 days of the event that includes a summary of actions taken, or to be taken, and the potential impact to the environment and the public.

5 OPERATIONS AND MAINTENANCE PLAN

This Operations and Maintenance Plan provides a brief description of the measures necessary for the HOA to operate, monitor, and maintain the mechanical components of the OU-1 remedy selected for the Site.

Each vapor mitigation system will be inspected annually, and maintenance will be performed, as appropriate, to ensure that the system continues to operate as designed. During each visit, the following routine activities will be conducted:

- A visual inspection of the exposed components of the entire system will be conducted including the fan, piping, warning devices (liquid-filled manometers), labeling on the system, and any membranes installed as a soil vapor retarder (if accessible). The fan will be inspected to ensure proper operation and continued effectiveness in providing the appropriate vacuum.
- The integrity of the concrete floor, walls, and foundation will be inspected, including at a minimum, inspecting all sealed joints and cracks in the concrete floor, foundation walls, vacuum points, and soil vapor retarder membrane, if accessible.
- The exhaust discharge point from the mitigation system will be inspected to verify that no new air intakes or receptors have been installed within the minimum distances specified by the NYSDOH guidance.
- Any routine maintenance needs that are identified will be performed, and any issues that are identified in these inspections will be promptly corrected.

Non-routine maintenance activities may be required based on a report from a property owner or occupant. Such an event may include the following:

- The warning device (liquid-filled manometer) indicates the mitigation system is not operating properly.
- The mitigation system (e.g., piping, valves, soil vapor retardant membrane, and fan) becomes damaged.
- The building undergoes renovations that may reduce the effectiveness of the mitigation system.

System components requiring repair work will be identified during the inspection and addressed as soon as possible based on contractor availability. Any significant maintenance or repair activities requiring modifications to the electrical wiring will be conducted by a licensed electrician. All inspections and maintenance performed on the system will be recorded on the inspection form presented in Appendix E.

6 PERIODIC ASSESSMENTS AND EVALUATIONS

6.1 CLIMATE CHANGE VULNERABILITY ASSESSMENT

Increases in both the severity and frequency of storms and other weather events, an increase in sea level elevations along with accompanying flooding impacts, shifting precipitation patterns and wide temperature fluctuation (resulting from global climatic change and instability) have the potential to significantly impact the performance, effectiveness, and protectiveness of a given Site and associated remedial systems. Vulnerability assessments provide information so that the Site and associated remedial systems are prepared for the impacts of the increasing frequency and intensity of severe storms/weather events and associated flooding.

The following criteria were considered in assessing the vulnerability of the Site remedial systems/controls to climate change:

- Proximity to flood plains
- Potential damage from poor drainage and storm water management
- Susceptibility to erosion
- Susceptibility to high winds
- Susceptibility to spills and releases.
- Susceptibility to power outages

The assessment did not identify any climate change-related susceptibilities of the future soil vapor mitigation systems or other controls at the Site. The property is not within or near an existing floodplain and future development will include a drainage and storm water management plan that will minimize potential damage arising from precipitation events. All the active components of the vapor mitigation systems will be powered by the electrical grid, which could experience a higher frequency of power outages in the future due to storm activity; however, all the systems will include a passive barrier that operates without power and, thus, the potential vulnerability (and possible exposure) is minimal. None of the mitigation systems will be powered via liquid fuels, thus, there is no potential for spills or releases related to the system operation.

6.2 GREEN REMEDIATION EVALUATION

NYSDEC's DER-31 Green Remediation requires that green remediation concepts and techniques be considered during all stages of the remedial program including Site management, with the goal of improving the sustainability of the cleanup and summarizing the net environmental benefit of any implemented green technology. This section of the SMP provides a summary of any green remediation evaluations to be completed for the Site during Site management, and as reported in the PRR.

Vapor mitigation systems are the only active engineering controls to be implemented at OU-1 of the Site as part of this SMP. The systems operate using relatively small, maintenance-free electrical fans that are quiet, require negligible amounts of electricity, and yield minimal discharges to the atmosphere. The green, best management practices listed for vapor mitigation systems in Appendix X3 of the ASTM Standard Guide for Greener Cleanups (ASTM E2893-16; and subsequent updates) will be reviewed to identify potentially applicable best management practices that can be incorporated into the design of the mitigation systems.

7 SITE MANAGEMENT REPORTS

Compliance with this SMP requires the submission of inspection reports and PRRs, both of which detail the inspection and monitoring activities described above. The inspection reports shall be submitted to the NYSDEC on an annual basis concurrent with the PRRs. The general requirements for each report are presented below. An annual Site inspection form, which has been tailored to the specific inspection and monitoring requirements for this SMP, is presented in Appendix E.

7.1 INSPECTION AND MAINTENANCE REPORTS

All Site management inspection, maintenance and monitoring activities or special events (e.g., an emergency) will be recorded on the appropriate inspection forms provided in Appendix E. These forms are subject to NYSDEC revision.

All applicable inspection forms and other records, including media sampling data and system maintenance reports, generated for the Site during the reporting period will be provided in electronic format to the NYSDEC in accordance with the requirements of Table 7-1 and summarized in the PRR.

Table 7-1: Schedule of Interim Monitoring/Inspection Reports

Task/Report	Reporting Frequency*
Inspection Report	Annually
Periodic Review Report	Annually

* The frequency of events will be conducted as specified until otherwise approved by the NYSDEC.

The interim monitoring or inspection report forms must include, at a minimum:

- Date of event or reporting period;
- Name, company, and position of person(s) conducting monitoring/inspection activities;
- Description of the activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet);
- Type of samples collected (e.g., sub-slab vapor, indoor air, outdoor air, etc.);
- Copies of all field forms completed (e.g., well sampling logs, chain-of-custody documentation, etc.);
- Sampling results in comparison to appropriate standards/criteria;
- A figure illustrating sample type and sampling locations;
- Copies of all laboratory data sheets, and the required laboratory data deliverables required for all points sampled (to be submitted electronically in the NYSDEC-identified format);
- Any observations, conclusions, or recommendations; and
- A determination as to whether contaminant conditions have changed since the last reporting event.

Routine maintenance event reporting forms will include, at a minimum:

- Date of event;
- Name, company, and position of person(s) conducting maintenance activities;
- Description of maintenance activities performed;
- Any modifications to the system;

- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents noted (included either on the checklist/form or on an attached sheet); and,
- Other documentation such as copies of invoices for maintenance work, receipts for replacement equipment, etc., (attached to the checklist/form).

Non-routine maintenance event reporting forms will include, at a minimum:

- Date of event;
- Name, company, and position of person(s) conducting non-routine maintenance/repair activities;
- Description of non-routine activities performed;
- Where appropriate, color photographs or sketches showing the approximate location of any problems or incidents (included either on the form or on an attached sheet); and
- Other documentation such as copies of invoices for repair work, receipts for replacement equipment, etc. (attached to the checklist/form).

All applicable inspection forms and other records, including media sampling data and system maintenance reports, generated for the Site during the reporting period will be provided in electronic format to the NYSDEC in accordance with the requirements of Table 7-1 and summarized in the PRR. Currently, data are to be supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link http://www.dec.ny.gov/chemical/62440.html.

7.2 PERIODIC REVIEW REPORT

A PRR will be submitted to the Department every year, beginning 16 months after the date the Environmental Easement has been recorded. The report, which will be the responsibility of the Site owner and then will transfer to the HOA when it is established (before any structures are occupied), will be prepared in accordance with NYSDEC DER-10 and submitted within 30 days of the end of each certification period (i.e., at the end of the year). Media sampling results will also be incorporated into the PRR, if applicable. The report will include:

- Identification, assessment, and certification of all ECs/ICs required by the remedy for the Site.
- Results of the required annual Site inspections and severe condition inspections, if applicable.
- All applicable Site management forms and other records generated for the Site during the reporting period in the NYSDEC-approved electronic format, if not previously submitted.
- A summary of any discharge monitoring data and/or information generated during the reporting period, with comments and conclusions.
- Data summary tables and graphical representations of chemicals of concern by media (groundwater, soil vapor, etc.), which include a listing of all compounds analyzed, along with the applicable standards, with all exceedances highlighted. These will include a presentation of past data as part of an evaluation of contaminant concentration trends.
- Results of all analyses, copies of all laboratory data, and the required laboratory data deliverables for all samples collected during the reporting period will be submitted in digital format as determined by the NYSDEC. Currently, data is supplied electronically and submitted to the NYSDEC EQuIS™ database in accordance with the requirements found at this link: http://www.dec.ny.gov/chemical/62440.html.
- A Site evaluation, which includes the following:
  - The compliance of the remedy with the requirements of the Site-specific Remedial Action and Remedial Design Work Plan, ROD or Decision Document;
  - The operation and the effectiveness of all treatment units, etc., including identification of any needed repairs or modifications;
  - Any new conclusions or observations regarding Site contamination based on inspections or data generated by the Monitoring and Sampling Plan for the media being monitored;
  - Recommendations regarding any necessary changes to the remedy and/or Monitoring and Sampling Plan; and,
  - Trends in contaminant levels in the affected media will be evaluated to determine if the remedy continues to be effective in achieving remedial goals as specified by the Decision Document.

- The overall performance and effectiveness of the remedy.

The PRR will be submitted to the NYSDEC Central Office and Regional Office in which the Site is located, and in electronic format to NYSDEC Central Office, Regional Office, and the NYSDOH Bureau of Environmental Exposure Investigation.

7.3 CERTIFICATION OF INSTITUTIONAL AND ENGINEERING CONTROLS

Following the last inspection of the reporting period, a Professional Engineer licensed to practice in New York State will prepare, and include in the PRR, the following certification as per the requirements of NYSDEC DER-10:

For each IC/EC identified for the Site, I certify that all the following statements are true:

- The Site inspections confirms the effectiveness of the IC/ECs required by the remedial program was performed under my direction.
- The ICs and ECs employed at this Site is unchanged from the date the control was put in place, or last approved by the Department.
- Nothing has occurred that would impair the ability of the control to protect the public health and environment.
- Nothing has occurred that would constitute a violation or failure to comply with any Site management plan for this control.
- Access to the Site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control.
- If a financial assurance mechanism is required under the oversight document for the Site, the mechanism remains valid and sufficient for the intended purpose under the document.
- Use of the Site is compliant with the environmental easement.
- The EC systems are performing as designed and are effective.
- To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the Site remedial program (and generally accepted engineering practices).
- The information presented in this report is accurate and complete.
- I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner or Owner's Designated Site Representative] (and if the Site consists of multiple properties): [I have been authorized and designated by all Site owners to sign this certification] for the Site.

7.4 CORRECTIVE MEASURES PLAN

If any component of the remedy is found to have failed, or if the periodic certification cannot be provided due to the failure of an IC or EC, a corrective measures plan will be submitted to the NYSDEC for approval. This plan will explain the failure and provide the details and schedule for performing work necessary to correct the failure. Unless an emergency condition exists, no work will be performed pursuant to the corrective measures plan until it is approved by the NYSDEC.

8 REFERENCES

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- Geomatrix Engineering, LLC, September 2005, Remedial Investigation Report TransTechnology Corporation Glen Head Site.
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- New York State Department of Environmental Conservation, February 2007, Site Characterization Report, Glen Head Groundwater Plume.

9 ACRONYM LIST

µg/kg	micrograms per kilogram
µg/l	micrograms per liter
bgs	below ground surface
CAMP	Community Air Monitoring Plan
CFR	Code of Federal Regulations
COC	Certificate of Completion
ECL	Environmental Conservation Law
EWP	Excavation Work Plan
FER	Final Engineering Report
HASP	Health and Safety Plan
IC/EC	Institutional or Engineering Control
LIRR	Long Island Railroad
mg/kg	milligrams per kilogram
NYCRR	New York Code of Rules and Regulations
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
OSHA	Occupational Safety and Health Administration
OU-1	Operable Unit No. 1
OU-2	Operable Unit No. 2
PAH	polycyclic aromatic hydrocarbon
PCB	polychlorinated biphenyls
PCE	tetrachloroethene
PVC	polyvinyl chloride
RAO	remedial action objective
RD/RA	remedial design/remedial action
RG	remedial goal
RI/FS	remedial investigation/feasibility study
ROD	Record of Decision
SCO	soil cleanup objective
SHSO	Site Health and Safety Officer
SMP	Site Management Plan
SSD	sub-slab depressurization
SVOC	semi-volatile organic compound
TAGM	Technical and Administrative Guidance Memorandum

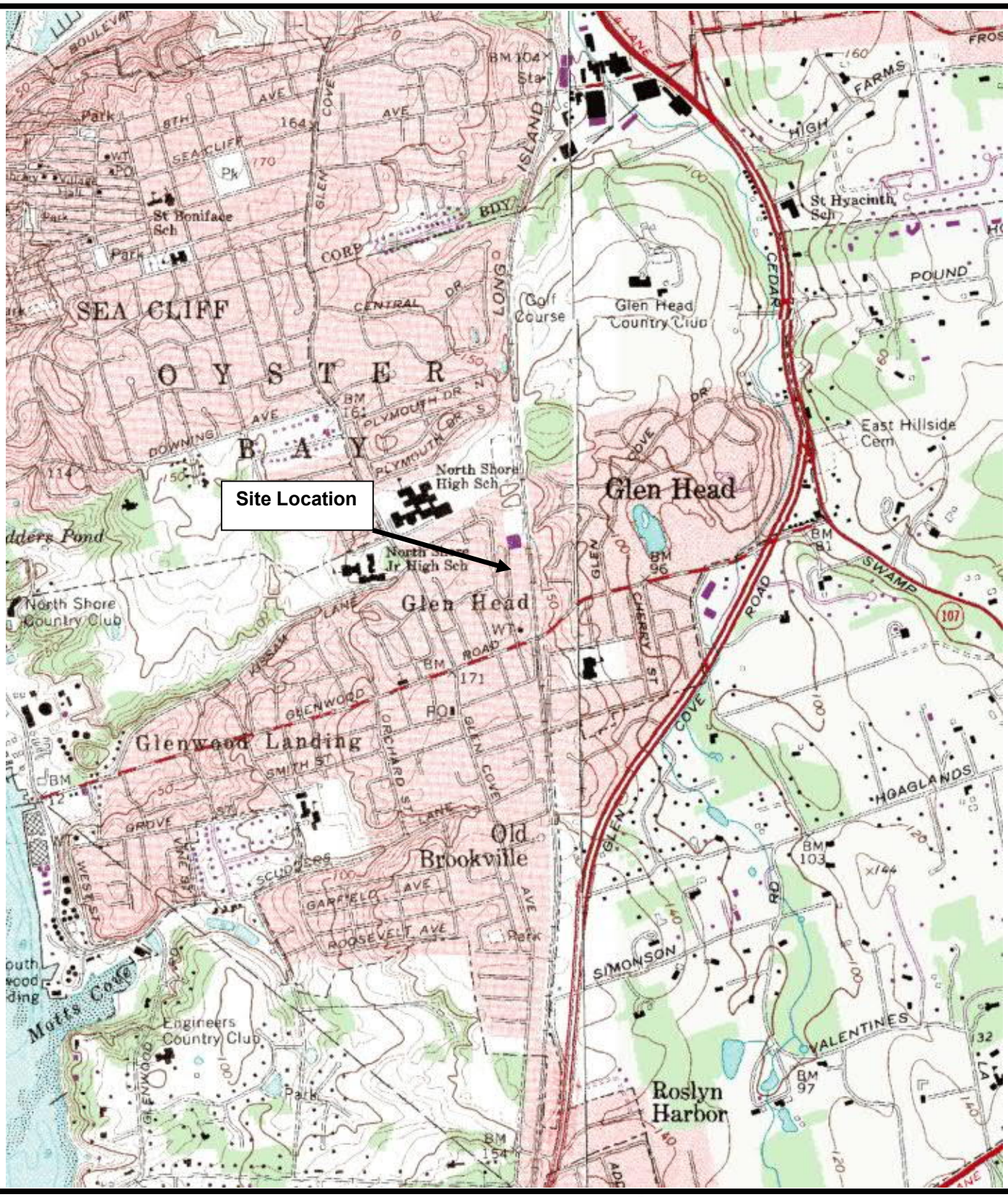
TAL	target analyte list
TCE	trichloroethene
TCL	target compound list
TTC	TransTechnology Corporation
VOC	volatile organic compound

FIGURES

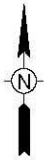
DWG Name:

Checked: Approved:

Drawn By: A



Reference
7.5 Minute Series Topographic Quadrangle
Sea Cliff, New York
Photorevised 1979; Scale 1:24,000



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WSP USA Inc.
100 SUMMER STREET, 13TH FLOOR
BOSTON, MASSACHUSETTS 02110
TEL: +1 617.426.7330

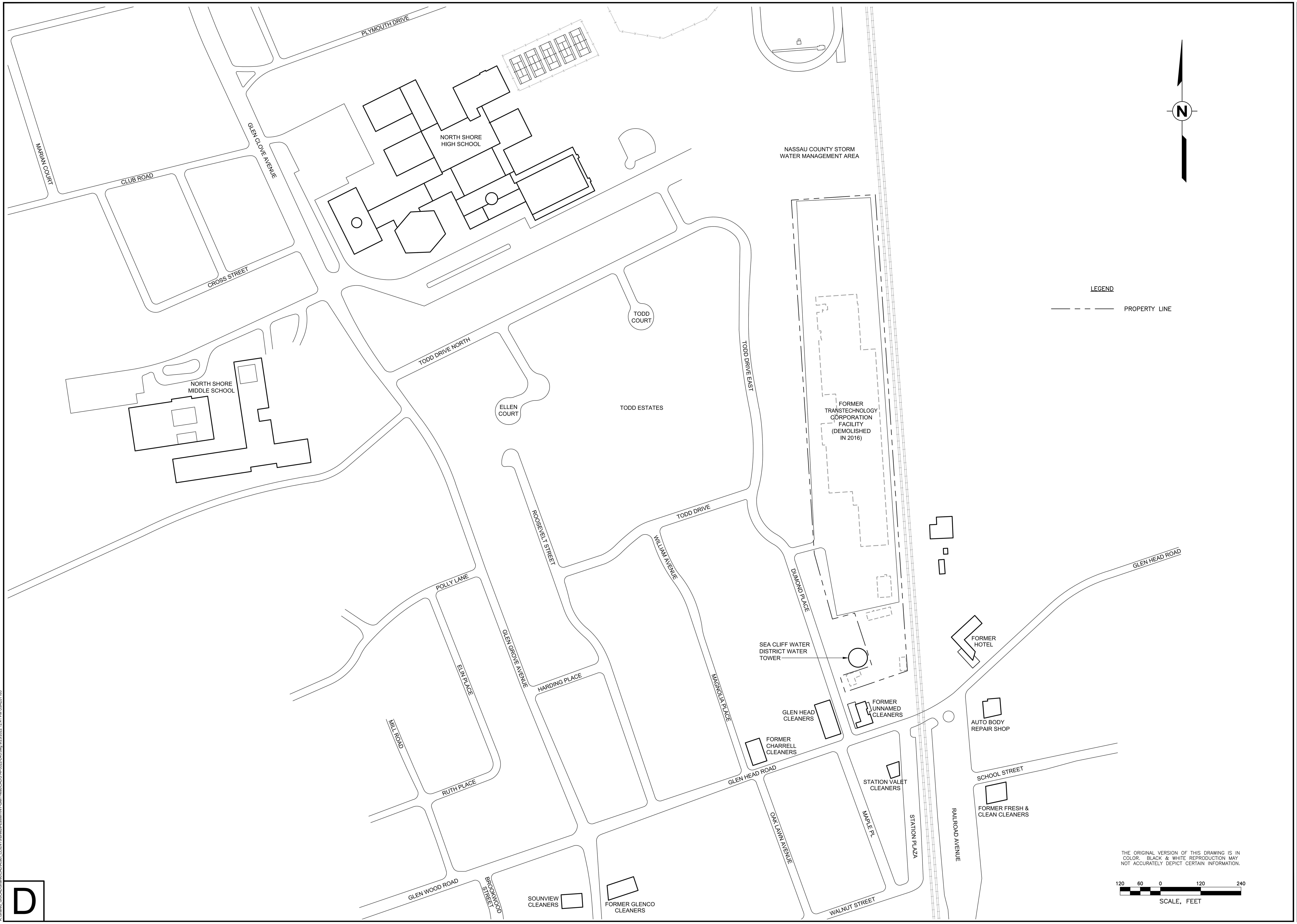
FIGURE 1

SITE LOCATION MAP

FORMER TRANSTECHNOLOGY CORPORATION
FACILITY — GLEN HEAD, NEW YORK

PREPARED FOR

Breeze-Eastern LLC
Whippany, New Jersey



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1	Revised:	Chkd:	Appr.:
2	Revised:	Chkd:	Appr.:
3	Revised:	Chkd:	Appr.:

REVISIONS

SEAL

STATE OF NEW YORK · DAVID ALAN RYKEN · 099287 · LICENSED PROFESSIONAL ENGINEER

SEPTEMBER 23, 2022
DATE

DRAWN BY	RA 08082022
CHECKED	DO 08082022
APPROVED	DAR 09232022

PROPERTY OF WSP USA INC.

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SURROUNDING AREA

FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

PREPARED FOR
BREEZE-EASTERN LLC
WHIPPANY, NEW JERSEY

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
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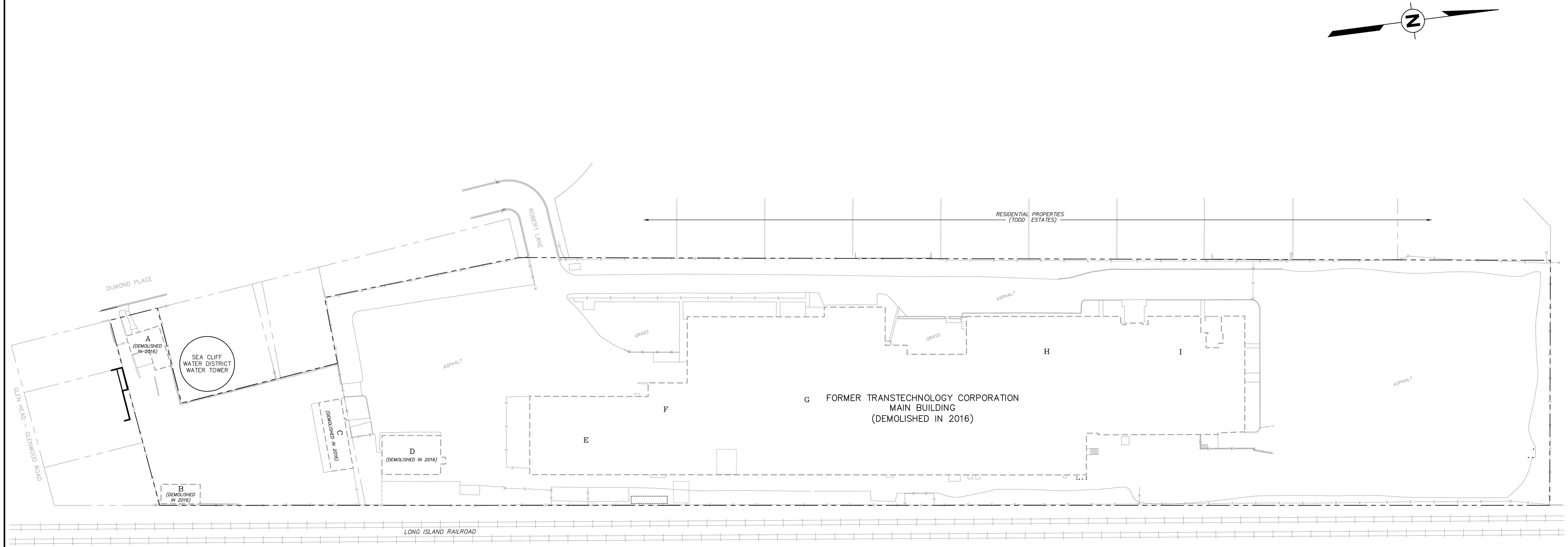
FIGURE 2

Drawing Number
314P0522.000-D45



LEGEND

PROPERTY BOUNDARY

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DATE: SEPTEMBER 23, 2022

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SITE LAYOUT

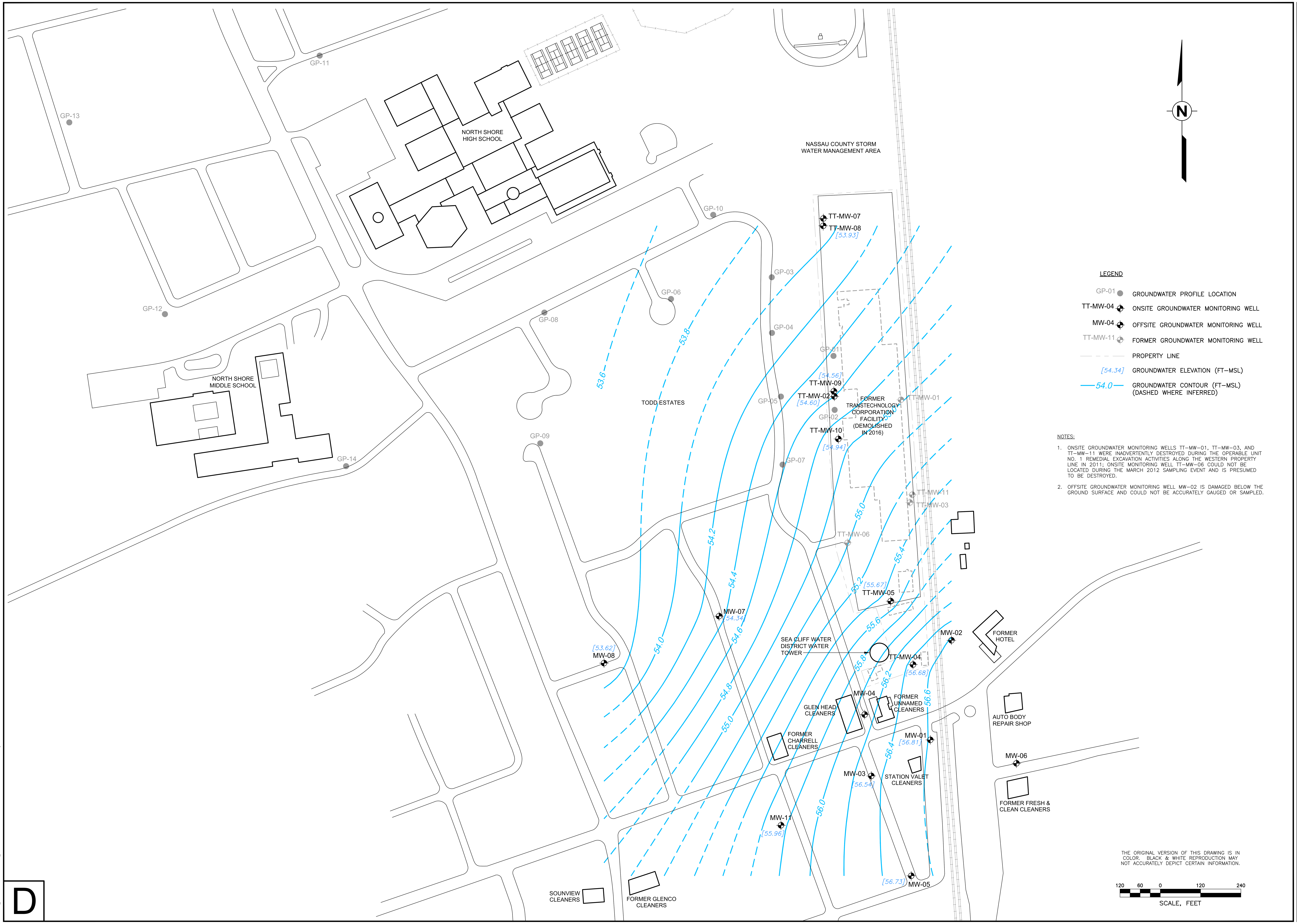
FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

PREPARED FOR
BREEZE-EASTERN LLC
WHIPPANY, NEW JERSEY

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
BOSTON, MA 02110
TEL: +1 617.426.7330

FIGURE 3

Drawing Number
314P0522.000-D46



LEGEND

GP-01 ●	GROUNDWATER PROFILE LOCATION
TT-MW-04	ONSITE GROUNDWATER MONITORING WELL
MW-04	OFFSITE GROUNDWATER MONITORING WELL
TT-MW-11	FORMER GROUNDWATER MONITORING WELL
— — —	PROPERTY LINE
[54.34]	GROUNDWATER ELEVATION (FT–MSL)
—54.0—	GROUNDWATER CONTOUR (FT–MSL) (DASHED WHERE INFERRED)

NOTES:

1. ONSITE GROUNDWATER MONITORING WELLS TT–MW–01, TT–MW–03, AND TT–MW–11 WERE INADVERTENTLY DESTROYED DURING THE OPERABLE UNIT NO. 1 REMEDIAL EXCAVATION ACTIVITIES ALONG THE WESTERN PROPERTY LINE IN 2011; ONSITE MONITORING WELL TT–MW–06 COULD NOT BE LOCATED DURING THE MARCH 2012 SAMPLING EVENT AND IS PRESUMED TO BE DESTROYED.
2. OFFSITE GROUNDWATER MONITORING WELL MW–02 IS DAMAGED BELOW THE GROUND SURFACE AND COULD NOT BE ACCURATELY GAUGED OR SAMPLED.

THE ORIGINAL VERSION OF THIS DRAWING IS IN COLOR. BLACK & WHITE REPRODUCTION MAY NOT ACCURATELY DEPICT CERTAIN INFORMATION.

REVISIONS

SEPTEMBER 23, 2022
DATE

GROUNDWATER ELEVATION CONTOURS MARCH 2012

FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

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BREEZE–EASTERN LLC
WHIPPANY, NEW JERSEY

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
BOSTON, MA 02110
TEL: +1 617.426.7330

FIGURE 4

Drawing Number
314P0522.000–D47

PARCEL B – LAND AREA ORDAINED TO BE "RMF-16"

ALL THAT CERTAIN PLOT, PIECE OR PARCEL OF LAND, WITH THE BUILDINGS AND IMPROVEMENTS THEREON ERECTED, SITUATE, LYING AND BEING AT GLEN HEAD, TOWN OF OYSTER BAY, COUNTY OF NASSAU, STATE OF NEW YORK, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT, WHICH IS FORMED BY THE INTERSECTION OF THE SOUTHERLY SIDE OF ROBERT LANE AND THE EASTERLY END OF ROBERT LANE AS SHOWN ON A CERTAIN MAP ENTITLED "MAP OF TODD ESTATES, SECTION 2", FILED IN THE OFFICE OF THE COUNTY OF NASSAU ON FEBRUARY 19, 1953 AS MAP NUMBER 5716;

RUNNING THENCE THE FOLLOWING 2 COURSES AND DISTANCES:

NORTH 07 DEGREES 18 MINUTES 17 SECONDS EAST, 40.30 FEET;

NORTH 84 DEGREES 14 MINUTES 29 SECONDS EAST, 13.71 FEET;

THENCE, ALONG A TANGENT CURVE TO THE LEFT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 29.08 FEET TO A POINT;

THENCE, ALONG A REVERSE CURVE TO THE RIGHT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 32.23 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE:

NORTH 86 DEGREES 06 MINUTES 03 SECONDS EAST, 6.74 FEET;

THENCE, ALONG A TANGENT CURVE TO THE LEFT WITH A RADIUS OF 25.00 FEET, FOR A DISTANCE OF 34.38 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING 4 COURSES AND DISTANCES TO A POINT ON THE EASTERLY SIDE OF DUMOND PLACE:

NORTH 07 DEGREES 18 MINUTES 17 SECONDS EAST, 812.69 FEET;

SOUTH 82 DEGREES 41 MINUTES 43 SECONDS EAST, 153.81 FEET;

SOUTH 07 DEGREES 09 MINUTES 00 SECONDS WEST, 1270.33 FEET;

SOUTH 82 DEGREES 06 MINUTES 30 SECONDS WEST, 195.90 FEET;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE ALONG THE EASTERLY SIDE OF DUMOND PLACE;

NORTH 07 DEGREES 11 MINUTES 00 SECONDS WEST, 50.00 FEET;

RUNNING THENCE THE FOLLOWING 4 COURSES AND DISTANCES BACK TO THE SAID POINT OR PLACE OF BEGINNING:

NORTH 82 DEGREES 49 MINUTES 00 SECONDS EAST, 100.17 FEET (ACTUAL)
NORTH 82 DEGREES 49 MINUTES 00 SECONDS EAST, 100.00 FEET (DEED)

NORTH 07 DEGREES 11 MINUTES 00 SECONDS WEST, 164.57 FEET (ACTUAL)
NORTH 07 DEGREES 11 MINUTES 00 SECONDS WEST, 164.64 FEET (DEED);

SOUTH 86 DEGREES 03 MINUTES 00 SECONDS WEST, 68.49 FEET (ACTUAL)
SOUTH 86 DEGREES 03 MINUTES 00 SECONDS WEST, 68.17 FEET (DEED);

NORTH 04 DEGREES 29 MINUTES 00 SECONDS WEST, 202.54 FEET TO THE POINT OR PLACE OF BEGINNING.

CONTAINING A LAND AREA OF: 5.00 acres

PARCEL A – LAND AREA ORDAINED TO BE "R1-7"

ALL THAT CERTAIN PLOT, PIECE OR PARCEL OF LAND, WITH THE BUILDINGS AND IMPROVEMENTS THEREON ERECTED, SITUATE, LYING AND BEING AT GLEN HEAD, TOWN OF OYSTER BAY, COUNTY OF NASSAU AND STATE OF NEW YORK, BOUNDED AND DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT WHICH IS FORMED BY THE INTERSECTION OF THE SOUTHERLY SIDE OF ROBERT LANE AND THE EASTERLY END OF ROBERT LANE AS SHOWN ON A CERTAIN MAP ENTITLED "MAP OF TODD ESTATES, SECTION 2", FILED IN THE OFFICE OF THE CLERK OF THE COUNTY OF NASSAU ON FEBRUARY 19, 1953 AS MAP NUMBER 5716;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE TO THE POINT OR PLACE OF BEGINNING;

NORTH 07 DEGREES 18 MINUTES 17 SECONDS EAST, 40.30 FEET; TO THE ACTUAL OR TRUE POINT OF BEGINNING, AND FROM SAID POINT, RUNNING THENCE THE FOLLOWING 7 COURSES AND DISTANCES:

NORTH 07 DEGREES 18 MINUTES 17 SECONDS EAST, 1014.52 FEET;

SOUTH 82 DEGREES 41 MINUTES 43 SECONDS EAST, 250.45 FEET;

SOUTH 07 DEGREES 09 MINUTES 00 SECONDS WEST, 150.85 FEET;

NORTH 82 DEGREES 41 MINUTES 43 SECONDS WEST, 153.81 FEET;

SOUTH 07 DEGREES 18 MINUTES 17 SECONDS WEST, 812.69 FEET;

THENCE, ALONG A TANGENT CURVE TO THE RIGHT WITH A RADIUS OF 25.00 FEET, FOR A DISTANCE OF 34.38 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE:

SOUTH 86 DEGREES 06 MINUTES 03 SECONDS WEST, 6.74 FEET;

THENCE, ALONG A TANGENT CURVE TO THE LEFT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 32.23 FEET TO A POINT;

THENCE, ALONG A REVERSE CURVE TO THE RIGHT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 29.08 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE BACK TO THE POINT OR PLACE OF BEGINNING;

SOUTH 84 DEGREES 14 MINUTES 29 SECONDS WEST, 13.71 FEET TO THE POINT OR PLACE OF BEGINNING.

CONTAINING A LAND AREA OF: 2.75 acres

RECORDED DEED
INDENTURE, M.P.B. COMPANY TO LUNDY ELECTRONICS & SYSTEMS INC., DATED APRIL 30, 1982, LIBER 9404, PAGE 403, FILED MAY 6, 1982.

ALL THAT CERTAIN PLOT, PIECE, OR PARCEL OF LAND WITH IMPROVEMENTS EXISTING THEREON, SITUATED, LYING, AND BEING IN GLEN HEAD, TOWN OF OYSTER BAY, COUNTY OF NASSAU, STATE OF NEW YORK, BEING BOUNDED AND MORE PARTICULARLY DESCRIBED AS FOLLOWS;

BEGINNING AT THE INTERSECTION FORMED BY THE SOUTHERLY SIDE OF ROBERT LANE AND THE EASTERLY END OF ROBERT LANE AS SHOWN ON THE MAP OF "TODD ESTATES" SECTION 2, FILED IN THE OFFICE OF THE NASSAU COUNTY CLERK ON FEBRUARY 19, 1953 AS MAP No. 5716;

RUNNING THENCE NORTH 07°18'17" EAST, 1054.82 FEET,

THENCE SOUTH 82°41'43" EAST, 250.45 FEET TO THE WESTERLY LINE OF LANDS OF THE LONG ISLAND RAILROAD,

RUNNING THENCE SOUTH 07°09'00" WEST ALONG LANDS OF THE LONG ISLAND RAILROAD, 1421.18 FEET,

THENCE SOUTH 82°06'30" WEST, 195.90 FEET TO THE EASTERLY SIDE OF DUMOND PLACE,

THENCE NORTH 07°13'00" WEST ALONG THE EASTERLY SIDE OF DUMOND PLACE, 50.00 FEET;

THENCE NORTH 82°49'00" EAST, 100.00 FEET;

THENCE NORTH 07°11'00" WEST, 164.64 FEET;

THENCE SOUTH 86°03'00" WEST, 68.17 FEET;

THENCE NORTH 04°29'00" WEST, 202.54 FEET TO THE POINT OR PLACE OF BEGINNING.

CONTAINING A LAND AREA OF: 7.75 acres

GRAPHIC SCALE

(IN FEET)

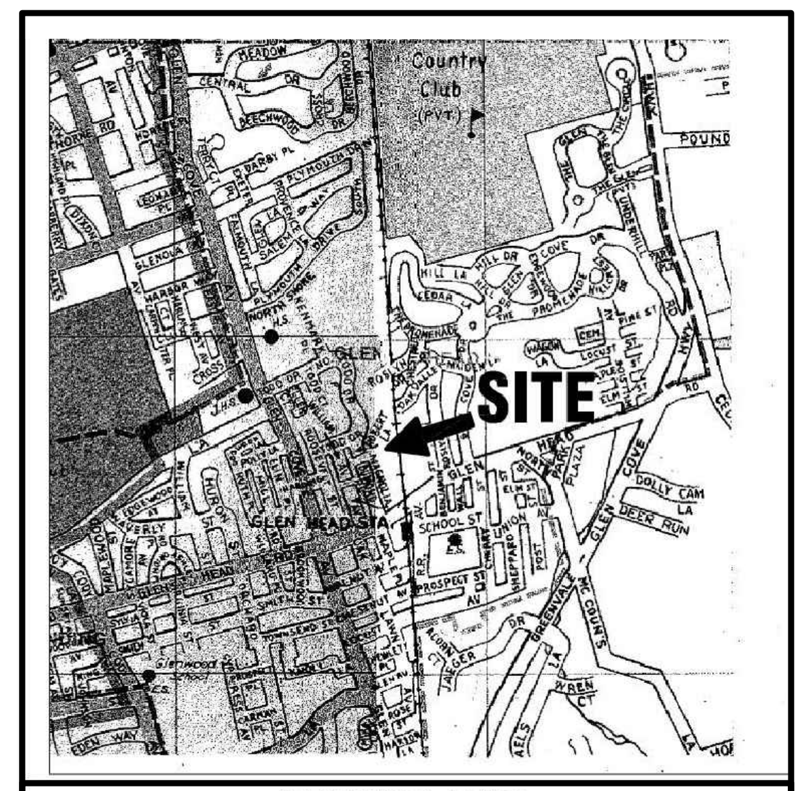
(IN METERS)

NOTE:

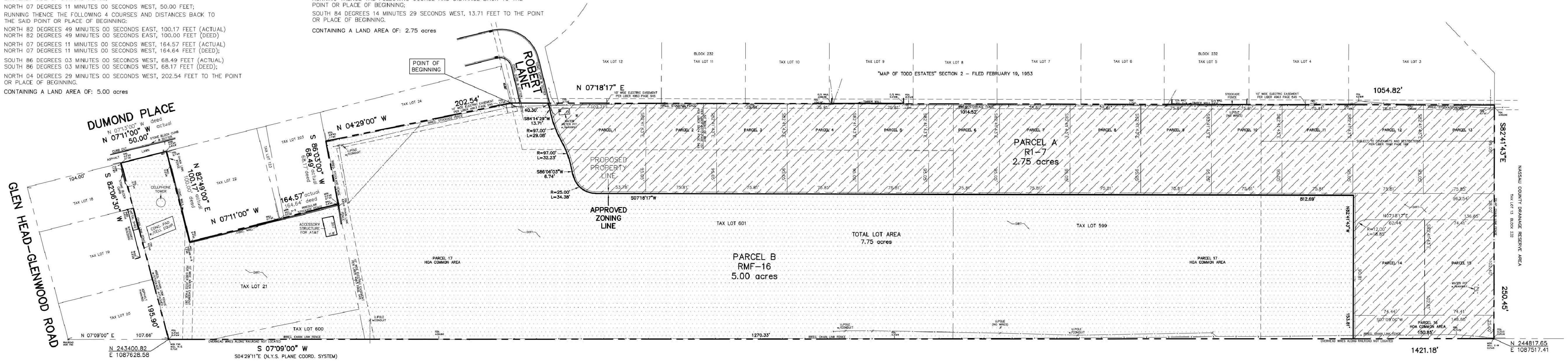
BEARING SYSTEM SHOWN IS IN REFERENCE TO DEED NORTH.

COORDINATES SHOWN ARE IN REFERENCE TO THE NEW YORK STATE PLANE COORDINATE SYSTEM.

ANGULAR DIFFERENCE BETWEEN DEED AND NEW YORK STATE PLANE IS 11°38'11" AS SHOWN ABOVE.



VICINITY MAP



LONG ISLAND RAILROAD

THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL EASEMENT HELD BY THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION PURSUANT TO TITLE 36 OF ARTICLE 71 OF THE NEW YORK ENVIRONMENTAL CONSERVATION LAW.

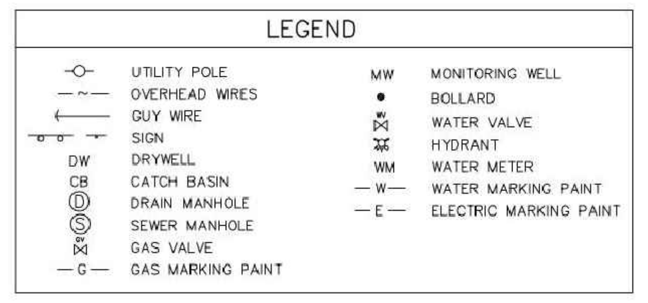
THIS MAP IS CERTIFIED TO:

–ONE ROBERT LANE, LLC

–THE PEOPLE OF THE STATE OF NEW YORK ACTING THROUGH ITS COMMISSIONER OF THE DEPARTMENT OF ENVIRONMENTAL CONSERVATION.

–FIDELITY NATIONAL TITLE INSURANCE COMPANY – TITLE No. 12-7405-64426N

LEGEND



PARCEL LEGEND

PARCEL A: R1-7 (2.703 ACRES)

PARCEL B: RMF-16 (5.001 ACRES)

SURVEY NOTES:
1. UNAUTHORIZED ALTERATION OR ADDITION TO THIS SURVEY IS A VIOLATION OF SECTION 7209 OF THE NEW YORK STATE EDUCATION LAW. COPIES OF THIS SURVEY MAP NOT BEARING THE SURVEYOR'S INKED OR EMBOSSED SEAL SHALL NOT BE CONSIDERED TO BE A VALID TRUE COPY. CERTIFICATIONS INDICATED HEREON SHALL RUN ONLY TO THE PERSON/PERSONS FOR WHOM THE SURVEY IS PREPARED, AND ON HIS/HER/THEIR BEHALF TO THE TITLE COMPANY, GOVERNMENTAL AGENCY, AND LENDING INSTITUTION LISTED HEREON, AND TO THE ASSIGNEES OF THE LENDING INSTITUTION. CERTIFICATIONS ARE NOT TRANSFERABLE TO ADDITIONAL INSTITUTIONS OR SUBSEQUENT OWNERS. THIS SURVEY WAS PREPARED IN ACCORDANCE WITH THE CURRENT CODE OF PRACTICE FOR LAND SURVEYORS ADOPTED BY THE NEW YORK STATE ASSOCIATION OF PROFESSIONAL LAND SURVEYORS.
2. THIS SURVEY IS SUBJECT TO ANY EASEMENT OF RECORD AND OTHER PERTINENT FACTS WHICH A TITLE SEARCH MIGHT DISCLOSE.
3. SUBSURFACE STRUCTURES AND/OR UTILITIES, IF ANY, NOT SHOWN.

MISC. NOTES:
1. THIS MAP WAS PREPARED WITH THE BENEFIT OF A TITLE REPORT PREPARED BY FIDELITY NATIONAL TITLE INSURANCE COMPANY, TITLE No. 12-7405-64426N, REPORT DATE OF SEPTEMBER 17, 2012.
2. AREAS NUMBERED AND DENOTED "PARCEL" REFER TO NUMBERING SHOWN ON A PROPOSED SUBDIVISION MAP PREPARED BY CAMERON ENGINEERING & ASSOCIATES IN CONJUNCTION WITH THIS OFFICE.
3. THE WRITTEN DESCRIPTIONS SHOWN HEREON AS FOUND IN A RESOLUTION BETWEEN DUMOND ENTERPRISES LLC, TRANSTECHNOLOGY CORPORATION AND THE TOWN OF OYSTER BAY DATED 04/08/2008.

ENVIRONMENTAL EASEMENT DESCRIPTION
NYSDEC SITE NUMBER 1-30-101

ANY EXCAVATION THAT COULD POTENTIALLY DISTURB SOIL WITH REMAINING CONTAMINATION OR DISCOVERED CONTAMINATION, INCLUDING BUT NOT LIMITED TO BUILDING CONSTRUCTION, MUST BE CONDUCTED IN ACCORDANCE WITH THE EXCAVATION WORK PLAN, APPENDIX C TO THE SITE MANAGEMENT PLAN (SMP), AND THE HEALTH AND SAFETY PLAN AND COMMUNITY AIR MONITORING PLAN PREPARED FOR THE SITE. ADDITIONALLY, NEW CONSTRUCTION AT THE SITE WILL REQUIRE AN ACTIVE SUB-SLAB DEPRESSURIZATION SYSTEM IN ACCORDANCE WITH THE SITE MANAGEMENT PLAN.

"THIS PROPERTY IS SUBJECT TO AN ENVIRONMENTAL EASEMENT HELD BY THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION PURSUANT TO TITLE 36 OF ARTICLE 71 OF THE NEW YORK ENVIRONMENTAL CONSERVATION LAW. THE ENGINEERING AND INSTITUTIONAL CONTROLS FOR THIS EASEMENT ARE SET FORTH IN MORE DETAIL IN THE SITE MANAGEMENT PLAN (SMP). A COPY OF THE SMP MUST BE OBTAINED BY ANY PARTY WITH AN INTEREST IN THE PROPERTY. THE SMP CAN BE OBTAINED FROM NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION, DIVISION OF ENVIRONMENTAL REMEDIATION, SITE CONTROL SECTION, 625 BROADWAY, ALBANY, NY 12233 OR AT derweb@dec.ny.gov".

EASEMENTS AND SERVITUDES

SEA CLIFF WATER COMPANY EASEMENT, DATED JULY 11, 1930, LIBER 1591, PAGE 10, FILED APRIL 1, 1931.

LONG ISLAND LIGHTING COMPANY EASEMENT, DATED AUGUST 1, 1952, LIBER 4963, PAGE 545, FILED AUGUST 22, 1952.

RIGHT OF WAY IN LIBER 5620, PAGE 260, DATED AUGUST 30, 1954, FILED AUGUST 31, 1954.

WATER EASEMENT, DATED APRIL 18, 1962, LIBER 7032, PAGE 261, FILED JUNE 29, 1962.

REFERENCE:

JERRY P. LaRUE PROFESSIONAL LAND SURVEYOR DRAWING TITLED, "SURVEY OF PROPERTY SUBJECT TO ENVIRONMENTAL EASEMENT AREAS". DATED: SEPTEMBER 09, 2021. (NO DRAWING NUMBER PROVIDED)

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SEPTEMBER 23, 2022
DATE

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REDEVELOPMENT PLAN

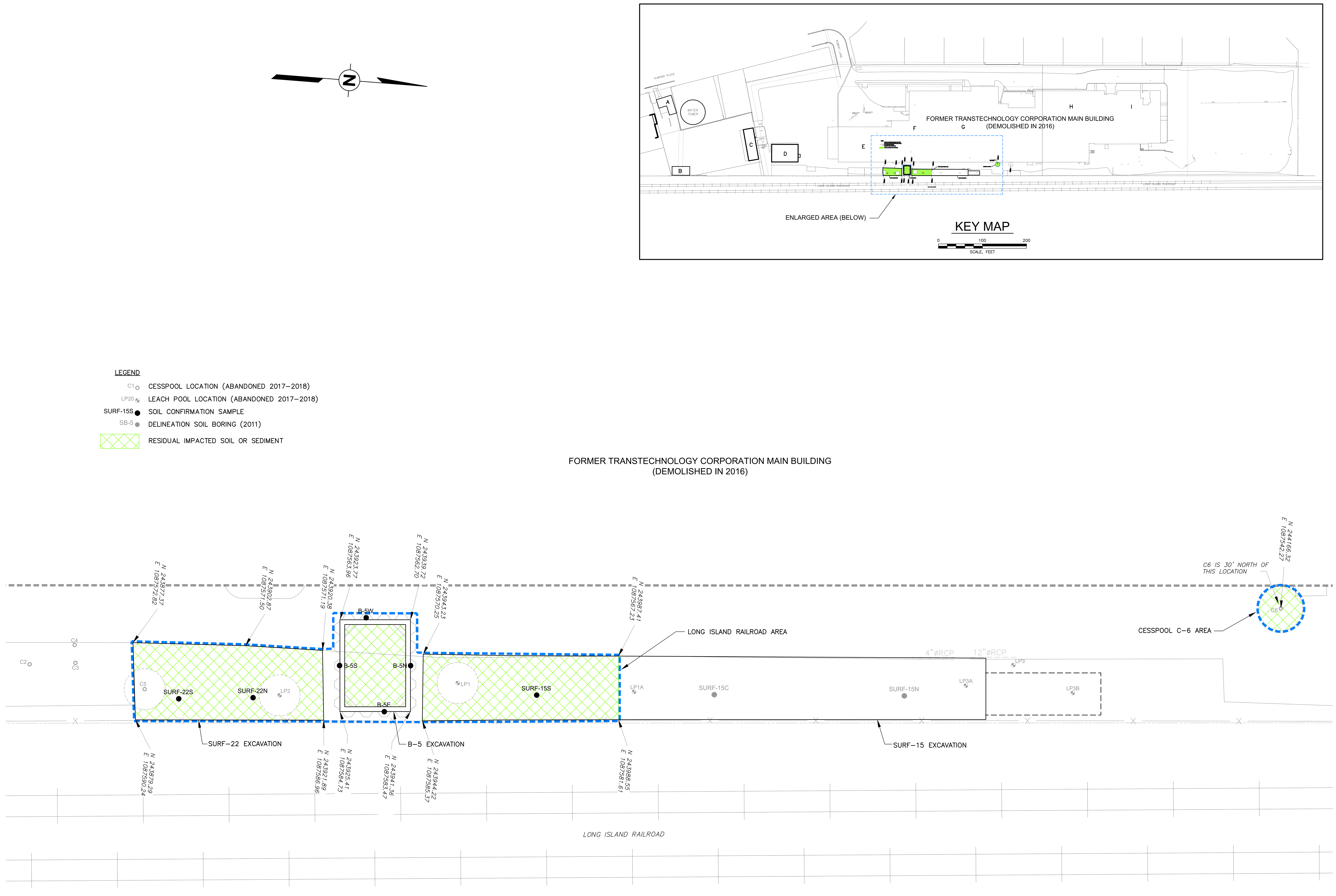
FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

PREPARED FOR
BREEZE-EASTERN LLC
WHIPPANY, NEW YORK

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
BOSTON, MA 02110
TEL: +1 617.426.7330

FIGURE 5

Drawing Number
314P0522.000-D45



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REFERENCE:

GEOMATRIX DRAWING TITLED, "SITE PLAN", FIGURE 2, DATED 05/07/2002, FILE NAME: 6238-001.

REVISIONS

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SEPTEMBER 23, 2022
DATE

DRAWN BY	PA 08082022
CHECKED	DJD 08082022
APPROVED	DAR 09232022

PROPERTY OF WSP USA INC.

EASTERN EXCAVATIONS WITH CONFIRMATION SAMPLE LOCATIONS AND RESIDUAL IMPACT AREA

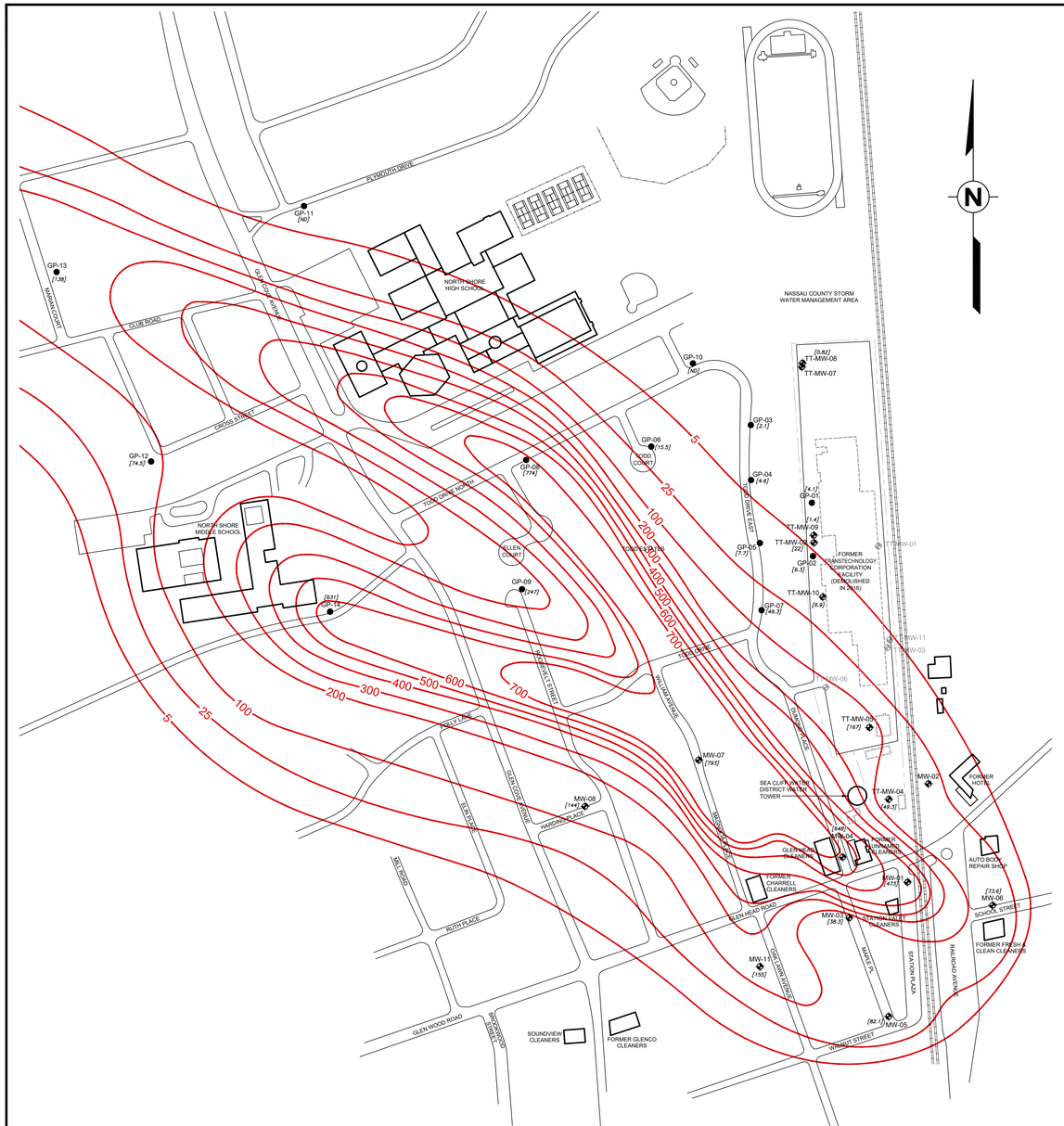
FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

PREPARED FOR
BREEZE-EASTERN LLC
WHIPPANY, NEW JERSEY

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
BOSTON, MA 02110
TEL: +1 617.426.7330

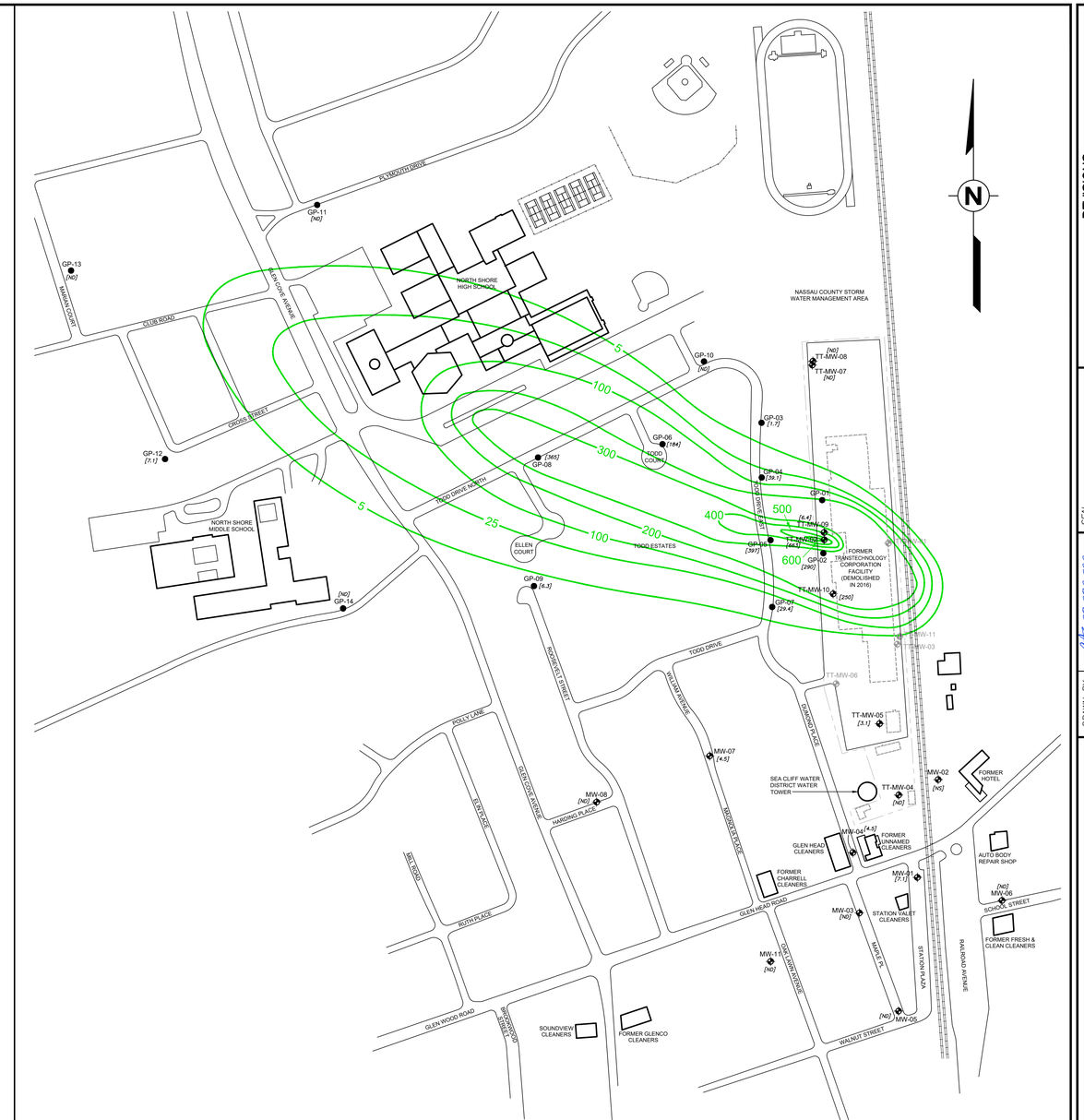
FIGURE 6

Drawing Number
314P0522.000–D49



LEGEND

- GP-01 ● GROUNDWATER PROFILE LOCATION
- TT-MW-04 ⊕ ONSITE GROUNDWATER MONITORING WELL
- MW-04 ⊕ OFFSITE GROUNDWATER MONITORING WELL
- TT-MW-11 ⊕ FORMER GROUNDWATER MONITORING WELL
- [38.3] PCE CONCENTRATIONS IN µg/l
- 25 PCE CONCENTRATION CONTOUR
- PROPERTY LINE
- ND PCE NOT DETECTED AT OR ABOVE REPORTING LIMIT
- NS WELL NOT SAMPLED



LEGEND

- GP-01 ● GROUNDWATER PROFILE LOCATION
- TT-MW-04 ⊕ ONSITE GROUNDWATER MONITORING WELL
- MW-04 ⊕ OFFSITE GROUNDWATER MONITORING WELL
- TT-MW-11 ⊕ FORMER GROUNDWATER MONITORING WELL
- [250] TCE CONCENTRATIONS IN µg/l
- 25 TCE CONCENTRATION CONTOUR
- PROPERTY LINE
- ND TCE NOT DETECTED AT OR ABOVE REPORTING LIMIT
- NS WELL NOT SAMPLED

NOTES:

1. TCE DATA FROM GROUNDWATER PROFILE SAMPLES THAT IS ATTRIBUTED TO THE REGIONAL PLUME (i.e., CO-LOCATED WITH LARGER PCE RESULTS) WERE OMITTED FROM THE CONTOURED DATA SET.
2. TT-MW-09 WAS NOT USED FOR CONTOURING.

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2	Revised:	Chkd:	Appr.:
3	Revised:	Chkd:	Appr.:

SEAL

STATE OF NEW YORK — 095230 — LICENSED PROFESSIONAL ENGINEER

SEPTEMBER 23, 2022
DATE

DRAWN BY	RJF 09/23/2022
CHECKED	SJH 09/23/2022
APPROVED	SJH 09/23/2022

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PCE AND TCE CONCENTRATIONS IN GROUNDWATER

FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

PREPARED FOR
BREEZE–EASTERN LLC
WHIPPANY, NEW JERSEY

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
BOSTON, MA 02110
TEL: +1 617.426.7330

FIGURE 7

Drawing Number
314P0522.000–D50

TABLES

Table 1

Revised Site-Specific Surface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Surface Soil Cleanup Objectives (d)
Metals (mg/kg)			
Aluminum	-	-	0
Antimony	-	-	0
Arsenic	16	16	16
Barium	400	300	300
Beryllium	72	-	72
Cadmium	4.3	1.2	1.2
Calcium	-	-	0
Chromium	110	19.1	19.1
Cobalt	-	30	30
Copper	270	119	119
Iron	-	17,000	17,000
Lead	400	145	145
Magnesium	-	-	0
Manganese	2,000	-	2,000
Mercury	0.81	0.59	0.59
Nickel	310	13	13
Potassium	-	-	0
Selenium	180	2	2
Silver	180	-	180
Sodium	-	-	0
Thallium	-	-	0
Vanadium	-	150	150
Zinc	10,000	308	308
SVOCs (µg/kg)			
1,2,4-Trichlorobenzene	-	3,400	3,400
1,2-Dichlorobenzene	100,000	7,900	7,900
1,3-Dichlorobenzene	49,000	1,600	1,600
1,4-Dichlorobenzene	13,000	8,500	8,500
2,4,5-Trichlorophenol	-	100	100
2,4,6-Trichlorophenol	-	-	0
2,4-Dichlorophenol	-	400	400
2,4-Dimethylphenol	-	-	0
2,4-Dinitrophenol	-	200 or MDL	200 or MDL
2,4-Dinitrotoluene	-	-	0
2,6-Dinitrotoluene	-	1,000	1,000
2-Chloronaphthalene	-	-	0
2-Chlorophenol	-	800	800
2-Methylnaphthalene	-	36,400	36,400
2-Methylphenol	100,000	100 or MDL	100 or MDL
2-Nitroaniline	-	430 or MDL	430 or MDL
2-Nitrophenol	-	330 or MDL	330 or MDL
3,3´-Dichlorobenzidine	-	-	0
3+4-Methylphenol	100,000	900	900
3-Nitroaniline	-	430 or MDL	430 or MDL
4,6-Dinitro-2-methylphenol	-	-	0

Table 1

Revised Site-Specific Surface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Surface Soil Cleanup Objectives (d)
SVOCs (µg/kg) - continued			
4-Bromophenyl phenyl ether	-	-	0
4-Chloro-3-methylphenol	-	240 or MDL	240 or MDL
4-Chloroaniline	-	220 or MDL	220 or MDL
4-Chlorophenyl phenyl ether	-	-	0
4-Nitroaniline	-	-	0
4-Nitrophenol	-	100	100
Acenaphthene	100,000	50,000	50,000
Acenaphthylene	100,000	41,000	41,000
Aniline	-	-	0
Anthracene	100,000	50,000	50,000
Azobenzene	-	-	0
Benzidine	-	-	0
Benzo(a)anthracene	1,000	510	510
Benzo(a)pyrene	1,000	590	590
Benzo(b)fluoranthene	1,000	1,100	1,000
Benzo(g,h,i)perylene	100,000	50,000	50,000
Benzo(k)fluoranthene	3,900	1,100	1,100
Benzoic acid	-	-	0
Benzyl alcohol	-	-	0
Bis(2-chloroethoxy)methane	-	-	0
Bis(2-chloroethyl)ether	-	-	0
Bis(2-chloroisopropyl)ether	-	-	0
Bis(2-ethylhexyl)phthalate	-	50,000	50,000
Butyl benzyl phthalate	-	50,000	50,000
Carbazole	-	-	0
Chrysene	3,900	720	720
Dibenzo(a,h)anthracene	330	140	140
Dibenzofuran	59,000	6,200	6,200
Diethyl phthalate	-	7,100	7,100
Dimethyl phthalate	-	2,000	2,000
Di-n-butyl phthalate	-	8,100	8,100
Di-n-octyl phthalate	-	50,000	50,000
Fluoranthene	100,000	50,000	50,000
Fluorene	100,000	50,000	50,000
Hexachlorobenzene	1,200	410	410
Hexachlorobutadiene	-	-	0
Hexachlorocyclopentadiene	-	-	0
Hexachloroethane	-	-	0
Indeno(1,2,3-c,d)pyrene	500	3,200	500
Isophorone	-	4,400	4,400
Naphthalene	100,000	1,300	1,300
Nitrobenzene	-	200 or MDL	200 or MDL
N-Nitrosodimethylamine	-	-	0
N-Nitrosodi-n-propylamine	-	-	0
N-Nitrosodiphenylamine	-	-	0
Pentachlorophenol	6,700	1,000 or MDL	1,000 or MDL

Table 1

Revised Site-Specific Surface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Surface Soil Cleanup Objectives (d)
SVOCs (µg/kg) - continued			
Phenanthrene	100,000	50,000	50,000
Phenol	100,000	30 or MDL	30 or MDL
Pyrene	100,000	50,000	50,000
Pyridine	-	-	0
VOCs (µg/kg)			
1,1,1,2-Tetrachloroethane	-	-	0
1,1,1-Trichloroethane	100,000	800	800
1,1,2,2-Tetrachloroethane	-	600	600
1,1,2-Trichloro-1,2,2-trifluoroethane	-	6,000	6,000
1,1,2-Trichloroethane	-	-	0
1,1-Dichloroethane	26,000	200	200
1,1-Dichloroethene	100,000	400	400
1,1-Dichloropropene	-	-	0
1,2,3-Trichlorobenzene	-	-	0
1,2,3-Trichloropropane	-	-	0
1,2,4,5-Tetramethylbenzene	-	-	0
1,2,4-Trichlorobenzene	-	3,400	3,400
1,2,4-Trimethylbenzene	52,000	-	52,000
1,2-Dibromo-3-chloropropane	-	-	0
1,2-Dibromoethane	-	-	0
1,2-Dichloroethane	3,100	100	100
1,2-Dichloropropane	-	-	0
1,3,5-Trimethylbenzene	52,000	-	52,000
1,3-dichloropropane	-	-	0
1,4-Dioxane	13,000	-	13,000
2,2-Dichloropropane	-	-	0
2-Butanone	100,000	300	300
2-Chloroethyl vinyl ether	-	-	0
2-Chlorotoluene	-	-	0
2-Hexanone	-	-	0
2-Propanol	-	-	0
4-Chlorotoluene	-	-	0
4-Isopropyltoluene	-	-	0
4-Methyl-2-pentanone	-	1,000	1,000
Acetone	100,000	200	200
Acrolein	-	-	0
Acrylonitrile	-	-	0
Benzene	4,800	60	60
Bromobenzene	-	-	0
Bromochloromethane	-	-	0
Bromodichloromethane	-	-	0
Bromoform	-	-	0
Bromomethane	-	-	0
Carbon disulfide	-	2,700	2,700
Carbon tetrachloride	2,400	600	600

Table 1

Revised Site-Specific Surface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Surface Soil Cleanup Objectives (d)
VOCs (µg/kg) - continued			
Chlorobenzene	100,000	1,700	1,700
Chlorodifluoromethane	-	-	0
Chloroethane	-	1,900	1,900
Chloroform	49,000	300	300
Chloromethane	-	-	0
cis-1,2-Dichloroethene	100,000	-	100,000
cis-1,3-Dichloropropene	-	-	0
Dibromochloromethane	-	-	0
Dibromomethane	-	-	0
Dichlorodifluoromethane	-	-	0
Diisopropyl ether	-	-	0
Ethanol	-	-	0
Ethyl acetate	-	-	0
Ethylbenzene	41,000	5,500	5,500
Freon-114	-	-	0
Hexachlorobutadiene	-	-	0
Isopropyl acetate	-	-	0
Isopropylbenzene	-	500	500
m,p-Xylene	100,000	1,200	1,200
Methyl tert-butyl ether	100,000	120	120
Methylene chloride	100,000	100	100
n-Amyl acetate	-	-	0
n-Butyl acetate	-	-	0
n-Butylbenzene	100,000	-	100,000
n-Propyl acetate	-	-	0
n-Propylbenzene	100,000	-	100,000
o-Xylene	100,000	1,200	1,200
p-Diethylbenzene	-	-	0
p-Ethyltoluene	-	-	0
sec-Butylbenzene	100,000	-	100,000
Styrene	-	-	0
t-Butyl alcohol	-	-	0
tert-Butylbenzene	100,000	-	100,000
Tetrachloroethene	19,000	1,400	1,400
Toluene	100,000	1,500	1,500
trans-1,2-Dichloroethene	100,000	300	300
trans-1,3-Dichloropropene	-	-	0
Trichloroethene	21,000	700	700
Trichlorofluoromethane	-	-	0
Vinyl acetate	-	-	0
Vinyl chloride	900	200	200

a/ VOCs = volatile organic compounds; SVOCs = semi-volatile organic compounds; µg/kg = microgram per kilogram; mg/kg = milligram per kilogram; RD/RA = Remedial Design and Remedial Action Work Plan.
b/ Table 375-6.8(b) of Title 6, New York Codes, Rules and Regulations, Part 375 (Restricted Residential).
c/ Surface soil cleanup criteria presented in Tables 1 and 2 of Geomatrix's 2007 RDRA.
d/ Evaluation criteria are the lower of the restricted residential soil cleanup objective (first column) and the surface soil cleanup criteria presented in the RDRA (second column). See Text for further explanation.

Table 2

Revised Site-Specific Subsurface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Subsurface Soil Cleanup Objectives (d)
Metals (mg/kg)			
Arsenic	16	16	16
Barium	400	300	300
Beryllium	72	-	72
Cadmium	4.3	10	4.3
Calcium	-	-	0
Chromium	110	50	50
Cobalt	-	30	30
Copper	270	119	119
Iron	-	17,000	17,000
Lead	400	145	145
Magnesium	-	-	0
Manganese	2,000	-	2,000
Mercury	0.81	0.59	0.59
Nickel	310	13	13
Potassium	-	-	0
Selenium	180	2	2
Silver	180	5	5
Sodium	-	-	0
Thallium	-	-	0
Vanadium	-	150	150
Zinc	10,000	308	308
SVOCs (µg/kg)			
1,2,4-Trichlorobenzene	-	3,400	3,400
1,2-Dichlorobenzene	100,000	7,900	7,900
1,3-Dichlorobenzene	49,000	1,600	1,600
1,4-Dichlorobenzene	13,000	8,500	8,500
2,4,5-Trichlorophenol	-	100	100
2,4,6-Trichlorophenol	-	-	0
2,4-Dichlorophenol	-	400	400
2,4-Dimethylphenol	-	-	0
2,4-Dinitrophenol	-	200 or MDL	200 or MDL
2,4-Dinitrotoluene	-	-	0
2,6-Dinitrotoluene	-	1,000	1,000
2-Chloronaphthalene	-	-	0
2-Chlorophenol	-	800	800
2-Methylnaphthalene	-	36,400	36,400
2-Methylphenol	100,000	100 or MDL	100 or MDL
2-Nitroaniline	-	430 or MDL	430 or MDL
2-Nitrophenol	-	330 or MDL	330 or MDL
3,3´-Dichlorobenzidine	-	-	0
3+4-Methylphenol	100,000	900	900
3-Nitroaniline	-	430 or MDL	430 or MDL
4,6-Dinitro-2-methylphenol	-	-	0

Table 2

Revised Site-Specific Subsurface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Subsurface Soil Cleanup Objectives (d)
SVOCs (µg/kg) - continued			
4-Bromophenyl phenyl ether	-	-	0
4-Chloro-3-methylphenol	-	240 or MDL	240 or MDL
4-Chloroaniline	-	220 or MDL	220 or MDL
4-Chlorophenyl phenyl ether	-	-	0
4-Nitroaniline	-	-	0
4-Nitrophenol	-	100	100
Acenaphthene	100,000	50,000	50,000
Acenaphthylene	100,000	41,000	41,000
Aniline	-	-	0
Anthracene	100,000	50,000	50,000
Azobenzene	-	-	0
Benzidine	-	-	0
Benzo(a)anthracene	1,000	510	510
Benzo(a)pyrene	1,000	590	590
Benzo(b)fluoranthene	1,000	1,100	1,000
Benzo(g,h,i)perylene	100,000	50,000	50,000
Benzo(k)fluoranthene	3,900	1,100	1,100
Benzoic acid	-	-	0
Benzyl alcohol	-	-	0
Bis(2-chloroethoxy)methane	-	-	0
Bis(2-chloroethyl)ether	-	-	0
Bis(2-chloroisopropyl)ether	-	-	0
Bis(2-ethylhexyl)phthalate	-	50,000	50,000
Butyl benzyl phthalate	-	50,000	50,000
Carbazole	-	-	0
Chrysene	3,900	720	720
Dibenzo(a,h)anthracene	330	140	140
Dibenzofuran	59,000	6,200	6,200
Diethyl phthalate	-	7,100	7,100
Dimethyl phthalate	-	2,000	2,000
Di-n-butyl phthalate	-	8,100	8,100
Di-n-octyl phthalate	-	50,000	50,000
Fluoranthene	100,000	50,000	50,000
Fluorene	100,000	50,000	50,000
Hexachlorobenzene	1,200	410	410
Hexachlorobutadiene	-	-	0
Hexachlorocyclopentadiene	-	-	0
Hexachloroethane	-	-	0
Indeno(1,2,3-c,d)pyrene	500	3,200	500
Isophorone	-	4,400	4,400
Naphthalene	100,000	1,300	1,300
Nitrobenzene	-	200 or MDL	200 or MDL
N-Nitrosodimethylamine	-	-	0
N-Nitrosodi-n-propylamine	-	-	0
N-Nitrosodiphenylamine	-	-	0
Pentachlorophenol	6,700	1,000 or MDL	1,000 or MDL

Table 2

Revised Site-Specific Subsurface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Subsurface Soil Cleanup Objectives (d)
SVOCs (µg/kg) - continued			
Phenanthrene	100,000	50,000	50,000
Phenol	100,000	30 or MDL	30 or MDL
Pyrene	100,000	50,000	50,000
Pyridine	-	-	0
VOCs (µg/kg)			
1,1,1,2-Tetrachloroethane	-	-	0
1,1,1-Trichloroethane	100,000	800	800
1,1,2,2-Tetrachloroethane	-	600	600
1,1,2-Trichloro-1,2,2-trifluoroethane	-	6,000	6,000
1,1,2-Trichloroethane	-	-	0
1,1-Dichloroethane	26,000	200	200
1,1-Dichloroethene	100,000	400	400
1,1-Dichloropropene	-	-	0
1,2,3-Trichlorobenzene	-	-	0
1,2,3-Trichloropropane		-	0
1,2,4,5-Tetramethylbenzene		-	0
1,2,4-Trichlorobenzene		3,400	3,400
1,2,4-Trimethylbenzene	52,000	-	52,000
1,2-Dibromo-3-chloropropane		-	0
1,2-Dibromoethane		-	0
1,2-Dichloroethane	3,100	100	100
1,2-Dichloropropane		-	0
1,3,5-Trimethylbenzene	52,000	-	52,000
1,3-dichloropropane		-	0
1,4-Dioxane	13,000	-	13,000
2,2-Dichloropropane		-	0
2-Butanone	100,000	300	300
2-Chloroethyl vinyl ether		-	0
2-Chlorotoluene		-	0
2-Hexanone		-	0
2-Propanol		-	0
4-Chlorotoluene		-	0
4-Isopropyltoluene		-	0
4-Methyl-2-pentanone		1,000	1,000
Acetone	100,000	200	200
Acrolein		-	0
Acrylonitrile		-	0
Benzene	4,800	60	60
Bromobenzene		-	0
Bromochloromethane		-	0
Bromodichloromethane		-	0
Bromoform		-	0
Bromomethane		-	0
Carbon disulfide		2,700	2,700
Carbon tetrachloride	2,400	600	600

Table 2

Revised Site-Specific Subsurface Soil Cleanup Objectives
Former TransTechnology Corporation Facility
Glen Head, New York (a)

Analyte:	Part 375 Restricted Residential Criteria (b)	RD/RA Criteria (c)	Revised Subsurface Soil Cleanup Objectives (d)
VOCs (µg/kg) - continued			
Chlorobenzene	100,000	1,700	1,700
Chlorodifluoromethane		-	0
Chloroethane		1,900	1,900
Chloroform	49,000	300	300
Chloromethane		-	0
cis-1,2-Dichloroethene	100,000	-	100,000
cis-1,3-Dichloropropene		-	0
Dibromochloromethane		-	0
Dibromomethane		-	0
Dichlorodifluoromethane		-	0
Diisopropyl ether		-	0
Ethanol		-	0
Ethyl acetate		-	0
Ethylbenzene	41,000	5,500	5,500
Freon-114		-	0
Hexachlorobutadiene		-	0
Isopropyl acetate		-	0
Isopropylbenzene		500	500
m,p-Xylene	100,000	1,200	1,200
Methyl tert-butyl ether	100,000	120	120
Methylene chloride	100,000	100	100
n-Amyl acetate		-	0
n-Butyl acetate		-	0
n-Butylbenzene	100,000	-	100,000
n-Propyl acetate		-	0
n-Propylbenzene	100,000	-	100,000
o-Xylene	100,000	1,200	1,200
p-Diethylbenzene		-	0
p-Ethyltoluene		-	0
sec-Butylbenzene	100,000	-	100,000
Styrene		-	0
t-Butyl alcohol		-	0
tert-Butylbenzene	100,000	-	100,000
Tetrachloroethene	19,000	1,400	1,400
Toluene	100,000	1,500	1,500
trans-1,2-Dichloroethene	100,000	300	300
trans-1,3-Dichloropropene		-	0
Trichloroethene	21,000	700	700
Trichlorofluoromethane		-	0
Vinyl acetate		-	0
Vinyl chloride	900	200	200

a/ VOCs = volatile organic compounds; SVOCs = semi-volatile organic compounds; µg/kg = microgram per kilogram mg/kg = milligram per kilogram; RD/RA = Remedial Design and Remedial Action Work Plan.

b/ Table 375-6.8(b) of Title 6, New York Codes, Rules and Regulations, Part 375 (Restricted Residential).

c/ Subsurface soil cleanup criteria presented in Tables 1 and 2 of Geomatrix's June 2007 RDRA

d/ Evaluation criteria are the lower of the restricted residential soil cleanup objective (first column) and the surface soil cleanup criteria presented in the 2007 RDRA (second column). See Text for further explanation.

APPENDIX

A ENVIRONMENTAL EASEMENT

**** Electronically Filed Document ****

Instrument Number: 2022-76763

Recorded As: EX-D06 - DEED AGREEM

Recorded On: July 21, 2022

Recorded At: 11:16:47 am Receipt Number: 2656287

Number of Pages: 12 Processed By: 001 JP

Book-VI/Pg: Bk-D VI-14273 Pg-53

Total Rec Fee(s): $400.00

** Examined and Charged as Follows **

06 - DEED AGREEMENT	$ 100.00	EX-Blocks - Deeds - $300	$ 300.00

	Tax Amount	Consid Amt	RS#/CS#		
Tax-Transfer OYSTER BAY	$ 0	$ 0	RE 29035	Basic	$ 0.00
				Local NY CITY	$ 0.00
				Additional MTA	$ 0.00
				Spec ASST	$ 0.00
				Spec ADDL SONYMA	$ 0.00
				Transfer	$ 0.00
Tax Charge:	$ 0				

Property Information:

Section	Block	Lot	Unit	Town Name
21	N-03	21		OYSTER BAY
21	N-03	599		OYSTER BAY
21	N-03	600		OYSTER BAY
21	N-03	601		OYSTER BAY

**********THIS PAGE IS PART OF THE INSTRUMENT **********

Any provision herein which restricts the Sale, Rental or use of the described REAL PROPERTY because of color or race is invalid and unenforceable under federal law.

Maureen O'Connell

County Clerk Maureen O'Connell

ENVIRONMENTAL EASEMENT GRANTED PURSUANT TO ARTICLE 71, TITLE 36 OF THE NEW YORK STATE ENVIRONMENTAL CONSERVATION LAW

THIS INDENTURE made this 2nd day of June, 2022, between Owner(s) Breeze-Eastern LLC, having an office at 35 Melanie Lane, Whippany, NJ 07981 County of Morris, State of New Jersey (the "Grantor"), and The People of the State of New York (the "Grantee."), acting through their Commissioner of the Department of Environmental Conservation (the "Commissioner", or "NYSDEC" or "Department" as the context requires) with its headquarters located at 625 Broadway, Albany, New York 12233,

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to encourage the remediation of abandoned and likely contaminated properties ("sites") that threaten the health and vitality of the communities they burden while at the same time ensuring the protection of public health and the environment; and

S: 21
B: N-3
L: 21
599
600
601

WHEREAS, the Legislature of the State of New York has declared that it is in the public interest to establish within the Department a statutory environmental remediation program that includes the use of Environmental Easements as an enforceable means of ensuring the performance of operation, maintenance, and/or monitoring requirements and the restriction of future uses of the land, when an environmental remediation project leaves residual contaminationat levels that have been determined to be safe for a specific use, but not all uses, or which includes engineered structures that must be maintained or protected against damage to perform properly and be effective, or which requires groundwater use or soil management restrictions; and

WHEREAS, the Legislature of the State of New York has declared that Environmental Easement shall mean an interest in real property, created under and subject to the provisions of Article 71, Title 36 of the New York State Environmental Conservation Law ("ECL") which contains a use restriction and/or a prohibition on the use of land in a manner inconsistent with engineering controls which are intended to ensure the long term effectiveness of a site remedial program or eliminate potential exposure pathways to hazardous waste or petroleum; and

WHEREAS, Grantor, is the owner of real property located at the address of 1 Robert Lane Glen Head, New York 11545 in the Town of Oyster Bay of County of Nassau and State of New York, known and designated on the tax map of the County Clerk of Nassau as tax map parcel numbers: Section 21, Block N-3 Lot 21, 599-601, being the same as that property conveyed to Grantor by deed dated April 30, 1982 and recorded in the Nassau County Clerk's Office in Liber and Page: Liber 9404, Page 403. The property subject to this Environmental Easement (the "Controlled Property") comprises approximately 7.75 +/- acres and is hereinafter more fully described in the Land Title Survey dated September 9, 2021, prepared by Jerry P. LaRue, Professional Land Surveyor, which will be attached to the Site Management Plan. The Controlled Property description is set forth in and attached hereto as Schedule A; and

WHEREAS, the Department accepts this Environmental Easement in order to ensure the protection of public health and the environment and to achieve the requirements for remediation established for the Controlled Property until such time as this Environmental Easement is extinguished pursuant to ECL Article 71, Title 36; and

NOW THEREFORE, in consideration of the mutual covenants contained herein, Grantor conveys to Grantee a permanent Environmental Easement pursuant to ECL Article 71, Title 36 in, on, over, under, and upon the Controlled Property as more fully described herein ("Environmental Easement")

1. Purposes. Grantor and Grantee acknowledge that the Purposes of this Environmental Easement are: to convey to Grantee real property rights and interests that will run with the land in perpetuity in order to provide an effective and enforceable means of encouraging the reuse and redevelopment of this Controlled Property at a level that has been determined to be safe for a specific use while ensuring the performance of operation, maintenance, and/or monitoring requirements; and to ensure the restriction of future uses of the land that are inconsistent with the above-stated purpose.

2. Institutional and Engineering Controls. The controls and requirements listed in the Department approved Site Management Plan ("SMP") including any and all Department approved amendments to the SMP are incorporated into and made part of this Environmental Easement. These controls and requirements apply to the use of the Controlled Property, run with the land, are binding on the Grantor and the Grantor's successors and assigns, and are enforceable in law or equity against any owner of the Controlled Property, any lessees and any person using the Controlled Property.

A. (1) The Controlled Property may be used for:

Residential use, as defined under 6 NYCRR 375-1.8(g)(2)(i), for the part of the Controlled Property identified as Parcel "A" on the survey attached as part of Schedule A, and Restricted-Residential use, as defined under 6 NYCRR 375-1.8(g)(2)(ii), for the part of the Controlled Property identified as Parcel "B" on the survey attached as part of Schedule A. The entire Controlled Property identified in Schedule A may be used for Commercial use, as defined under 6 NYCRR 375-1.8(g)(2)(iii) and Industrial use, as defined under 6 NYCRR 375-1.8(g)(2)(iv).

(2) All Engineering Controls must be operated and maintained as specified in the Site Management Plan (SMP);

(3) All Engineering Controls must be inspected at a frequency and in a manner defined in the SMP;

(4) The use of groundwater underlying the property is prohibited without necessary water quality treatment as determined by the NYSDOH or the Nassau County Department of Health to render it safe for use as drinking water or for industrial purposes, and the user must first notify and obtain written approval to do so from the Department;

(5) Groundwater and other environmental or public health monitoring must be performed as defined in the SMP;

(6) Data and information pertinent to Site Management of the Controlled Property must be reported at the frequency and in a manner defined in the SMP;

(7) All future activities on the property that will disturb remaining contaminated material must be conducted in accordance with the SMP;

(8) Monitoring to assess the performance and effectiveness of the remedy must be performed as defined in the SMP;

(9) Operation, maintenance, monitoring, inspection, and reporting of any mechanical or physical components of the remedy shall be performed as defined in the SMP;

(10) Access to the site must be provided to agents, employees or other representatives of the State of New York with reasonable prior notice to the property owner to assure compliance with the restrictions identified by this Environmental Easement.

B. The Controlled Property shall not be used for raising livestock or producing animal products for human consumption, and the above-stated engineering controls may not be discontinued without an amendment or extinguishment of this Environmental Easement.

C. The SMP describes obligations that the Grantor assumes on behalf of Grantor, its successors and assigns. The Grantor's assumption of the obligations contained in the SMP which may include sampling, monitoring, and/or operating a treatment system, and providing certified reports to the NYSDEC, is and remains a fundamental element of the Department's determination that the Controlled Property is safe for a specific use, but not all uses. The SMP may be modified in accordance with the Department's statutory and regulatory authority. The Grantor and all successors and assigns, assume the burden of complying with the SMP and obtaining an up-to-date version of the SMP from:

Site Control Section
Division of Environmental Remediation
NYSDEC
625 Broadway
Albany, New York 12233
Phone: (518) 402-9553

D. Grantor must provide all persons who acquire any interest in the Controlled Property a true and complete copy of the SMP that the Department approves for the Controlled Property and all Department-approved amendments to that SMP.

E. Grantor covenants and agrees that until such time as the Environmental Easement is extinguished in accordance with the requirements of ECL Article 71, Title 36 of the ECL, the property deed and all subsequent instruments of conveyance relating to the Controlled Property shall state in at least fifteen-point bold-faced type:

This property is subject to an Environmental Easement held by the New York State Department of Environmental Conservation pursuant to Title 36 of Article 71 of the Environmental Conservation Law.

F. Grantor covenants and agrees that this Environmental Easement shall be incorporated in full or by reference in any leases, licenses, or other instruments granting a right to use the Controlled Property.

G. Grantor covenants and agrees that it shall, at such time as NYSDEC may require, submit to NYSDEC a written statement by an expert the NYSDEC may find acceptable certifying under penalty of perjury, in such form and manner as the Department may require, that:

(1) the inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under the direction of the individual set forth at 6 NYCRR Part 375-1.8(h)(3).

(2) the institutional controls and/or engineering controls employed at such site:

(i) are in-place;

(ii) are unchanged from the previous certification, or that any identified changes to the controls employed were approved by the NYSDEC and that all controls are in the Department-approved format; and

(iii) that nothing has occurred that would impair the ability of such control to protect the public health and environment;

(3) the owner will continue to allow access to such real property to evaluate the continued maintenance of such controls;

(4) nothing has occurred that would constitute a violation or failure to comply with any site management plan for such controls;

(5 the report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

(6) to the best of his/her knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and

(7) the information presented is accurate and complete.

H. [redacted]

[redacted] **[Text Intentionally Omitted]**

3. Right to Enter and Inspect. Grantee, its agents, employees, or other representatives of the State may enter and inspect the Controlled Property in a reasonable manner and at reasonable times to assure compliance with the above-stated restrictions.

4. Reserved Grantor's Rights. Grantor reserves for itself, its assigns, representatives, and successors in interest with respect to the Property, all rights as fee owner of the Property, including:

A. Use of the Controlled Property for all purposes not inconsistent with, or limited by the terms of this Environmental Easement;

B. The right to give, sell, assign, or otherwise transfer part or all of the underlying fee interest to the Controlled Property, subject and subordinate to this Environmental Easement;

5. Enforcement

A. This Environmental Easement is enforceable in law or equity in perpetuity by Grantor, Grantee, or any affected local government, as defined in ECL Section 71-3603, against the owner of the Property, any lessees, and any person using the land. Enforcement shall not be defeated because of any subsequent adverse possession, laches, estoppel, or waiver. It is not a defense in any action to enforce this Environmental Easement that: it is not appurtenant to an interest in real property; it is not of a character that has been recognized traditionally at common law; it imposes a negative burden; it imposes affirmative obligations upon the owner of any interest in the burdened property; the benefit does not touch or concern real property; there is no privity of estate or of contract; or it imposes an unreasonable restraint on alienation.

B. If any person violates this Environmental Easement, the Grantee may revoke the Certificate of Completion with respect to the Controlled Property.

C. Grantee shall notify Grantor of a breach or suspected breach of any of the terms of this Environmental Easement. Such notice shall set forth how Grantor can cure such breach or suspected breach and give Grantor a reasonable amount of time from the date of receipt of notice in which to cure. At the expiration of such period of time to cure, or any extensions granted by Grantee, the Grantee shall notify Grantor of any failure to adequately cure the breach or suspected breach, and Grantee may take any other appropriate action reasonably necessary to remedy any breach of this Environmental Easement, including the commencement of any proceedings in accordance with applicable law.

D. The failure of Grantee to enforce any of the terms contained herein shall not be deemed a waiver of any such term nor bar any enforcement rights.

6. Notice. Whenever notice to the Grantee (other than the annual certification) or approval from the Grantee is required, the Party providing such notice or seeking such approval shall identify the Controlled Property by referencing the following information:

County, NYSDEC Site Number, NYSDEC Brownfield Cleanup Agreement, State Assistance Contract or Order Number, and the County tax map number or the Liber and Page or computerized system identification number.

Parties shall address correspondence to: Site Number: 130101
Office of General Counsel
NYSDEC
625 Broadway
Albany New York 12233-5500

With a copy to:

Site Control Section
Division of Environmental Remediation
NYSDEC
625 Broadway
Albany, NY 12233

All notices and correspondence shall be delivered by hand, by registered mail or by Certified mail and return receipt requested. The Parties may provide for other means of receiving and communicating notices and responses to requests for approval.

7. Recordation. Grantor shall record this instrument, within thirty (30) days of execution of this instrument by the Commissioner or her/his authorized representative in the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

8. Amendment. Any amendment to this Environmental Easement may only be executed by the Commissioner of the New York State Department of Environmental Conservation or the Commissioner's Designee, and filed with the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

9. Extinguishment. This Environmental Easement may be extinguished only by a release by the Commissioner of the New York State Department of Environmental Conservation, or the Commissioner's Designee, and filed with the office of the recording officer for the county or counties where the Property is situated in the manner prescribed by Article 9 of the Real Property Law.

10. Joint Obligation. If there are two or more parties identified as Grantor herein, the obligations imposed by this instrument upon them shall be joint and several.

11. Consistency with the SMP. To the extent there is any conflict or inconsistency between the terms of this Environmental Easement and the SMP, regarding matters specifically addressed by the SMP, the terms of the SMP will control.

IN WITNESS WHEREOF, Grantor has caused this instrument to be signed in its name.

Breeze-Eastern LLC:

By: _____

Print Name: Nancy Piperato

Title: VP Finance Date: 4/21/2022

Grantor's Acknowledgment

STATE OF NEW JERSEY)
) ss:
COUNTY OF MORRIS)

On the 21st day of April, in the year 2022, before me, the undersigned, personally appeared Nancy Piperato, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their capacity(ies), and that by his/her/their signature(s) on the instrument, the individual(s), or the person upon behalf of which the individual(s) acted, executed the instrument.

Notary Public - State of New Jersey

JUNEANNE V BASCOM
Comm. Exp. December 17, 2023
NOTARY PUBLIC
Comm. #2427956
NEW JERSEY

THIS ENVIRONMENTAL EASEMENT IS HEREBY ACCEPTED BY THE PEOPLE OF THE STATE OF NEW YORK, Acting By and Through the Department of Environmental Conservation as Designee of the Commissioner,

By: Andrew Guglielmi

Division of Environmental Remediation

Andrew Guglielmi, Director

Grantee's Acknowledgment

STATE OF NEW YORK)
) ss:
COUNTY OF ALBANY)

On the 2nd day of June, in the year 2022 before me, the undersigned, personally appeared ~~Susan Kutcharnick~~ Andrew Guglielmi, personally known to me or proved to me on the basis of satisfactory evidence to be the individual(s) whose name is (are) subscribed to the within instrument and acknowledged to me that he/she/ executed the same in his/her/ capacity as Designee of the Commissioner of the State of New York Department of Environmental Conservation, and that by his/her/ signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

Amanda J Kukle

Notary Public - State of New York

Amanda Judith Kukle

AMANDA JUDITH KUKLE
NOTARY PUBLIC, State of New York
Reg. No. 02KU6328588
Qualified in Greene County
Commission Expires August 3, 2023

SCHEDULE "A" PROPERTY DESCRIPTION

PARCEL A – LAND AREA ORDAINED TO BE "R1-7"

ALL THAT CERTAIN PLOT, PIECE OR PARCEL OF LAND, WITH THE BUILDINGS AND IMPROVEMENTS THEREON ERECTED, SITUATE, LYING AND BEING AT GLEN HEAD, TOWN OF OYSTER BAY, COUNTY OF NASSAU AND STATE OF NEW YORK, BOUNDED AND DESCRIBED AS FOLLOWS:

COMMENCING AT A POINT WHICH IS FORMED BY THE INTERSECTION OF THE SOUTHERLY SIDE OF ROBERT LANE AND THE EASTRLY END OF ROBERT LANE AS SHOWN ON A CERTAIN MAP ENTITLED "MAP OF TODD ESTATES, SECTION 2", FILED IN THE OFFICE OF THE CLERK OF THE COUNTY OF NASSAU ON FEBRUARY 19, 1953 AS MAP NUMBER 5716;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE TO THE POINT OR PLACE OF BEGINNING;

NORTH 07 DEGREES 18 MINUTES 17 SECONDS EAST, 40.30 FEET; TO THE ACTUAL OR TRUE POINT OF BEGINNING, AND FROM SAID POINT, RUNNING THENCE THE FOLLOWING 7 COURSES AND DISTANCES:

NORTH 07 DEGREES 18 MINUTES 17 SECONDS EAST, 1014.52 FEET;

SOUTH 82 DEGREES 41 MINUTES 43 SECONDS EAST, 250.45 FEET;

SOUTH 07 DEGREES 09 MINUTES 00 SECONDS WEST, 150.85 FEET;

NORTH 82 DEGREES 41 MINUTES 43 SECONDS WEST, 153.81 FEET;

SOUTH 07 DEGREES 18 MINUTES 17 SECONDS WEST, 812.69 FEET;

THENCE, ALONG A TANGENT CURVE TO THE RIGHT WITH A RADIUS OF 25.00 FEET, FOR A DISTANCE OF 34.38 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE:

SOUTH 86 DEGREES 06 MINUTES 03 SECONDS WEST, 6.74 FEET;

THENCE, ALONG A TANGENT CURVE TO THE LEFT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 32.23 FEET TO A POINT;

THENCE, ALONG A REVERSE CURVE TO THE RIGHT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 29.08 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE BACK TO THE POINT OR PLACE OF BEGINNING;

SOUTH 84 DEGREES 14 MINUTES 29 SECONDS WEST, 13.71 FEET TO THE POINT OR PLACE OF BEGINNING.

CONTAINING A LAND AREA OF: 2.75 acres

SCHEDULE "A" PROPERTY DESCRIPTION

PARCEL B – LAND AREA ORDAINED TO BE "RMF-16"

ALL THAT CERTAIN PLOT, PIECE OR PARCEL OF LAND, WITH THE BUILDINGS AND IMPROVEMENTS THEREON ERECTED, SITUATE, LYING AND BEING AT GLEN HEAD, TOWN OF OYSTER BAY, COUNTY OF NASSAU, STATE OF NEW YORK, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT, WHICH IS FORMED BY THE INTERSECTION OF THE SOUTHERLY SIDE OF ROBERT LANE AND THE EASTERLY END OF ROBERT LANE AS SHOWN ON A CERTAIN MAP ENTITLED "MAP OF TODD ESTATES, SECTION 2", FILED IN THE OFFICE OF THE COUNTY OF NASSAU ON FEBRUARY 19, 1953 AS MAP NUMBER 5716;

RUNNING THENCE THE FOLLOWING 2 COURSES AND DISTANCES:

NORTH 07 DEGREES 18 MINUTES 17 SECONDS EAST, 40.30 FEET;

NORTH 84 DEGREES 14 MINUTES 29 SECONDS EAST, 13.71 FEET;

THENCE, ALONG A TANGENT CURVE TO THE LEFT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 29.08 FEET TO A POINT;

THENCE, ALONG A REVERSE CURVE TO THE RIGHT WITH A RADIUS OF 97.00 FEET, FOR A DISTANCE OF 32.23 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE:

NORTH 86 DEGREES 06 MINUTES 03 SECONDS EAST, 6.74 FEET;

THENCE, ALONG A TANGENT CURVE TO THE LEFT WITH A RADIUS OF 25.00 FEET, FOR A DISTANCE OF 34.38 FEET TO A POINT;

RUNNING THENCE THE FOLLOWING 4 COURSES AND DISTANCES TO A POINT ON THE EASTERLY SIDE OF DUMOND PLACE:

NORTH 07 DEGREES 18 MONUTES 17 SECONDS EAST, 812.69 FEET;

SOUTH 82 DEGREES 41 MINUTES 43 SECONDS EAST, 153.81 FEET;

SOUTH 07 DEGREES 09 MINUTES 00 SECONDS WEST, 1270.33 FEET;

SOUTH 82 DEGREES 06 MINUTES 30 SECONDS WEST, 195.90 FEET;

RUNNING THENCE THE FOLLOWING COURSE AND DISTANCE ALONG THE EASTERLY SIDE OF DUMOND PLACE;

NORTH 07 DEGREES 11 MINUTES 00 SECINDS WEST, 50.00 FEET;

RUNNING THENCE THE FOLLOWING 4 COURSES AND DISTANCES BACK TO THE SAID POINT OR PLACE OF BEGINNING:

NORTH 82 DEGREES 49 MINUTES 00 SECONDS EAST, 100.17 FEET (ACTUAL)
NORTH 82 DEGREES 49 MINUTES 00 SECONDS EAST, 100.00 FEET (DEED)

NORTH 07 DEGREES 11 MINUTES 00 SECONDS WEST, 164.57 FEET (ACTUAL)
NORTH 07 DEGREES 11 MINUTES 00 SECONDS WEST, 164.64 FEET (DEED);

SOUTH 86 DEGREES 03 MINUTES 00 SECONDS WEST, 68.49 FEET (ACTUAL)
SOUTH 86 DEGREES 03 MINUTES 00 SECONDS WEST, 68.17 FEET (DEED);

NORTH 04 DEGREES 29 MINUTES 00 SECONDS WEST, 202.54 FEET TO THE POINT OR PLACE OF BEGINNING.

CONTAINING A LAND AREA OF: 5.00 acres

TP-584 (9/19)

Department of Taxation and Finance

Combined Real Estate Transfer Tax Return, Credit Line Mortgage Certificate, and Certification of Exemption from the Payment of Estimated Personal Income Tax

Recording office time stamp

See Form TP-584-I, Instructions for Form TP-584, *before completing this form. Print or type.*

Schedule A – Information relating to conveyance

Grantor/Transferor ☐ Individual ☐ Corporation ☐ Partnership ☐ Estate/Trust ☐ Single member LLC ☒ Multi-member LLC ☐ Other	Name *(if individual, last, first, middle initial)* (☐ *mark an X if more than one grantor)* Breeze-Eastern LLC			Social Security number (SSN)
	Mailing address 35 Melanie Lane			SSN
	City Whippany	State NJ	ZIP code 07981	Employer Identification Number (EIN) 95-4062211
	Single member's name if grantor is a single member LLC *(see instructions)* TRANS-Dim INC.			Single member EIN or SSN 34-1750032
Grantee/Transferee ☐ Individual ☐ Corporation ☐ Partnership ☐ Estate/Trust ☐ Single member LLC ☐ Multi-member LLC ☒ Other	Name *(if individual, last, first, middle initial)* (☐ *mark an X if more than one grantee)* People of the State of New York / Department of Environmental Conservation			SSN
	Mailing address 625 Broadway			SSN
	City Albany	State NY	ZIP code 12233	EIN 14-6013200
	Single member's name if grantee is a single member LLC *(see instructions)*			Single member EIN or SSN

Location and description of property conveyed

Tax map designation – Section, block & lot *(include dots and dashes)*	SWIS code (six digits)	Street address	City, town, or village	County
21/N-3, Lots 21, block 599, 600, 601	2P2419	1 Robert Lane	Glen Head	Nassau

Type of property conveyed *(mark an X in applicable box)*

1 ☒ One- to three-family house
2 ☐ Residential cooperative
3 ☐ Residential condominium
4 ☐ Vacant land
5 ☐ Commercial/industrial
6 ☐ Apartment building
7 ☐ Office building
8 ☐ Four-family dwelling
9 ☐ Other _____

Date of conveyance: 06 (month) 02 (day) 2022 (year)

Percentage of real property conveyed which is residential real property _____ % *(see instructions)*

Condition of conveyance *(mark an X in all that apply)*

a. ☐ Conveyance of fee interest
b. ☐ Acquisition of a controlling interest (state percentage acquired _____ %)
c. ☐ Transfer of a controlling interest (state percentage transferred _____ %)
d. ☐ Conveyance to cooperative housing corporation
e. ☐ Conveyance pursuant to or in lieu of foreclosure or enforcement of security interest *(attach Form TP-584.1, Schedule E)*
f. ☐ Conveyance which consists of a mere change of identity or form of ownership or organization *(attach Form TP-584.1, Schedule F)*
g. ☐ Conveyance for which credit for tax previously paid will be claimed *(attach Form TP-584.1, Schedule G)*
h. ☐ Conveyance of cooperative apartment(s)
i. ☐ Syndication
j. ☐ Conveyance of air rights or development rights
k. ☐ Contract assignment
l. ☐ Option assignment or surrender
m. ☐ Leasehold assignment or surrender
n. ☐ Leasehold grant
o. ☒ Conveyance of an easement
p. ☐ Conveyance for which exemption from transfer tax claimed *(complete Schedule B, Part 3)*
q. ☐ Conveyance of property partly within and partly outside the state
r. ☐ Conveyance pursuant to divorce or separation
s. ☐ Other *(describe)* _____

For recording officer's use	Amount received	Date received	Transaction number
	Schedule B, Part 1 $ _____ Schedule B, Part 2 $		

Schedule B – Real estate transfer tax return (Tax Law Article 31)

Part 1 – Computation of tax due

1	Enter amount of consideration for the conveyance *(if you are claiming a total exemption from tax, mark an X in the Exemption claimed box, enter consideration and proceed to Part 3)* ☐ **Exemption claimed**	1. 0
2	Continuing lien deduction *(see instructions if property is taken subject to mortgage or lien)*	2. 0
3	Taxable consideration *(subtract line 2 from line 1)*	3. 0
4	Tax: $2 for each $500, or fractional part thereof, of consideration on line 3	4. 0
5	Amount of credit claimed for tax previously paid *(see instructions and attach Form TP-584.1, Schedule G)*	5. 0
6	Total tax due* *(subtract line 5 from line 4)*	6. 0

Part 2 – Computation of additional tax due on the conveyance of residential real property for $1 million or more

1	Enter amount of consideration for conveyance *(from Part 1, line 1)*	1. 0
2	Taxable consideration *(multiply line 1 by the percentage of the premises which is residential real property, as shown in Schedule A)*	2. 0
3	Total additional transfer tax due* *(multiply line 2 by 1% (.01))*	3. 0

Part 3 – Explanation of exemption claimed on Part 1, line 1 *(mark an X in all boxes that apply)*

The conveyance of real property is exempt from the real estate transfer tax for the following reason:

a. Conveyance is to the United Nations, the United States of America, New York State, or any of their instrumentalities, agencies, or political subdivisions (or any public corporation, including a public corporation created pursuant to agreement or compact with another state or Canada) ..... a ☐

b. Conveyance is to secure a debt or other obligation ..... b ☐

c. Conveyance is without additional consideration to confirm, correct, modify, or supplement a prior conveyance ..... c ☐

d. Conveyance of real property is without consideration and not in connection with a sale, including conveyances conveying realty as bona fide gifts ..... d ☐

e. Conveyance is given in connection with a tax sale ..... e ☐

f. Conveyance is a mere change of identity or form of ownership or organization where there is no change in beneficial ownership. (This exemption cannot be claimed for a conveyance to a cooperative housing corporation of real property comprising the cooperative dwelling or dwellings.) Attach Form TP-584.1, Schedule F ..... f ☐

g. Conveyance consists of deed of partition ..... g ☐

h. Conveyance is given pursuant to the federal Bankruptcy Act ..... h ☐

i. Conveyance consists of the execution of a contract to sell real property, without the use or occupancy of such property, or the granting of an option to purchase real property, without the use or occupancy of such property ..... i ☐

j. Conveyance of an option or contract to purchase real property with the use or occupancy of such property where the consideration is less than $200,000 and such property was used solely by the grantor as the grantor's personal residence and consists of a one-, two-, or three-family house, an individual residential condominium unit, or the sale of stock in a cooperative housing corporation in connection with the grant or transfer of a proprietary leasehold covering an individual residential cooperative apartment ..... j ☐

k. Conveyance is not a conveyance within the meaning of Tax Law, Article 31, § 1401(e) *(attach documents supporting such claim)* ..... k ☐

* The total tax (from Part 1, line 6 and Part 2, line 3 above) is due within 15 days from the date of conveyance. Make check(s) payable to the county clerk where the recording is to take place. For conveyances of real property within New York City, use Form TP-584-NYC. If a recording is not required, send this return and your check(s) made payable to the ***NYS Department of Taxation and Finance***, directly to the NYS Tax Department, RETT Return Processing, PO Box 5045, Albany NY 12205-0045. If not using U.S. Mail, see Publication 55, *Designated Private Delivery Services*.

Schedule C – Credit Line Mortgage Certificate (Tax Law Article 11)

Complete the following only if the interest being transferred is a fee simple interest.
This is to certify that: *(mark an X in the appropriate box)*

1. ☐ The real property being sold or transferred is not subject to an outstanding credit line mortgage.

2. ☐ The real property being sold or transferred is subject to an outstanding credit line mortgage. However, an exemption from the tax is claimed for the following reason:

   a ☐ The transfer of real property is a transfer of a fee simple interest to a person or persons who held a fee simple interest in the real property (whether as a joint tenant, a tenant in common or otherwise) immediately before the transfer.

   b ☐ The transfer of real property is (A) to a person or persons related by blood, marriage or adoption to the original obligor or to one or more of the original obligors or (B) to a person or entity where 50% or more of the beneficial interest in such real property after the transfer is held by the transferor or such related person or persons (as in the case of a transfer to a trustee for the benefit of a minor or the transfer to a trust for the benefit of the transferor).

   c ☐ The transfer of real property is a transfer to a trustee in bankruptcy, a receiver, assignee, or other officer of a court.

   d ☐ The maximum principal amount secured by the credit line mortgage is $3 million or more, and the real property being sold or transferred is **not** principally improved nor will it be improved by a one- to six-family owner-occupied residence or dwelling.

   Note: for purposes of determining whether the maximum principal amount secured is $3 million or more as described above, the amounts secured by two or more credit line mortgages may be aggregated under certain circumstances. See TSB-M-96(6)-R for more information regarding these aggregation requirements.

   e ☐ Other *(attach detailed explanation)*.

3. ☐ The real property being transferred is presently subject to an outstanding credit line mortgage. However, no tax is due for the following reason:

   a ☐ A certificate of discharge of the credit line mortgage is being offered at the time of recording the deed.

   b ☐ A check has been drawn payable for transmission to the credit line mortgagee or mortgagee's agent for the balance due, and a satisfaction of such mortgage will be recorded as soon as it is available.

4. ☐ The real property being transferred is subject to an outstanding credit line mortgage recorded in _____ (insert liber and page or reel or other identification of the mortgage). The maximum principal amount of debt or obligation secured by the mortgage is _____. No exemption from tax is claimed and the tax of _____ is being paid herewith. *(Make check payable to county clerk where deed will be recorded.)*

Signature (both the grantors and grantees must sign)

The undersigned certify that the above information contained in Schedules A, B, and C, including any return, certification, schedule, or attachment, is to the best of their knowledge, true and complete, and authorize the person(s) submitting such form on their behalf to receive a copy for purposes of recording the deed or other instrument effecting the conveyance.

_____ Grantor signature | VP of Finance Title | Andrew Guglielmi Grantee signature | Director of DEP Title

Nancy Piccato Grantor signature | VP of Finance Title | Andrew Guglielmi Grantee signature | Dir of DEP Title

Reminder: Did you complete all of the required information in Schedules A, B, and C? Are you required to complete Schedule D? If you marked *e*, *f*, or *g* in Schedule A, did you complete Form TP-584.1? Have you attached your check(s) made payable to the county clerk where recording will take place? If no recording is required, send this return and your check(s), made payable to the ***NYS Department of Taxation and Finance***, directly to the NYS Tax Department, RETT Return Processing, PO Box 5045, Albany NY 12205-0045. If not using U.S. Mail, see Publication 55, *Designated Private Delivery Services*.

Schedule D – Certification of exemption from the payment of estimated personal income tax (Tax Law, Article 22, § 663)

Complete the following only if a fee simple interest or a cooperative unit is being transferred by an individual or estate or trust.

If the property is being conveyed by a referee pursuant to a foreclosure proceeding, proceed to Part 2, mark an *X* in the second box under *Exemption for nonresident transferors/sellers*, and sign at bottom.

Part 1 – New York State residents

If you are a New York State resident transferor/seller listed in Form TP-584, Schedule A (or an attachment to Form TP-584), you must sign the certification below. If one or more transferor/seller of the real property or cooperative unit is a resident of New York State, **each** resident transferor/seller must sign in the space provided. If more space is needed, photocopy this Schedule D and submit as many schedules as necessary to accommodate all resident transferors/sellers.

Certification of resident transferors/sellers

This is to certify that at the time of the sale or transfer of the real property or cooperative unit, the transferor/seller as signed below was a resident of New York State, and therefore is not required to pay estimated personal income tax under Tax Law § 663(a) upon the sale or transfer of this real property or cooperative unit.

Signature	Print full name	Date
Signature	Print full name	Date
Signature	Print full name	Date
Signature	Print full name	Date

Note: A resident of New York State may still be required to pay estimated tax under Tax Law § 685(c), but not as a condition of recording a deed.

Part 2 – Nonresidents of New York State

If you are a nonresident of New York State listed as a transferor/seller in Form TP-584, Schedule A (or an attachment to Form TP-584) but are not required to pay estimated personal income tax because one of the exemptions below applies under Tax Law § 663(c), mark an ***X*** in the box of the appropriate exemption below. If any one of the exemptions below applies to the transferor/seller, that transferor/seller is not required to pay estimated personal income tax to New York State under Tax Law § 663. **Each** nonresident transferor/seller who qualifies under one of the exemptions below must sign in the space provided. If more space is needed, photocopy this Schedule D and submit as many schedules as necessary to accommodate all nonresident transferors/sellers.

If none of these exemption statements apply, you must complete Form IT-2663, *Nonresident Real Property Estimated Income Tax Payment Form*, or Form IT-2664, *Nonresident Cooperative Unit Estimated Income Tax Payment Form.* For more information, see *Payment of estimated personal income tax,* on Form TP-584-I, page 1.

Exemption for nonresident transferors/sellers

This is to certify that at the time of the sale or transfer of the real property or cooperative unit, the transferor/seller (grantor) of this real property or cooperative unit was a nonresident of New York State, but is not required to pay estimated personal income tax under Tax Law § 663 due to one of the following exemptions:

☐ The real property or cooperative unit being sold or transferred qualifies in total as the transferor's/seller's principal residence (within the meaning of Internal Revenue Code, section 121) from _____ (Date) to _____ (Date) *(see instructions)*.

☐ The transferor/seller is a mortgagor conveying the mortgaged property to a mortgagee in foreclosure, or in lieu of foreclosure with no additional consideration.

☐ The transferor or transferee is an agency or authority of the United States of America, an agency or authority of New York State, the Federal National Mortgage Association, the Federal Home Loan Mortgage Corporation, the Government National Mortgage Association, or a private mortgage insurance company.

Signature	Print full name	Date
Signature	Print full name	Date
Signature	Print full name	Date
Signature	Print full name	Date

APPENDIX

B LIST OF SITE CONTACTS

APPENDIX B – LIST OF SITE CONTACTS

Name	**Phone/Email Address**
Nancy Piperato (Breeze-Eastern LLC)	(973) 602-1025; npiperato@breeze-eastern.com
David P. Bouchard (WSP USA Inc.)	(315) 374-8494; dave.bouchard@wsp.com
Ms. Tara Rutland (New York State Department of Environmental Conservation)	(518) 402-9621; tara.rutland@dec.ny.gov
Michael Bogin, Esquire; (SIVE, PAGET & RIESEL P.C.)	(646) 378-7210; mbogin@sprlaw.com

APPENDIX

C LEGAL DESCRIPTION

APPENDIX C – METES AND BOUNDS

ALL that certain plot, piece, or parcel of land with improvements existing thereon, situated, lying, and being in Glen Head, Town of Oyster Bay, County of Nassau, State of New York, being bounded and more particularly described as follows:

BEGINNING at the intersection formed by the southerly side of Robert Lane and the easterly end of Robert Lane as shown on the map of, " Todd Estates", Section 2, filed in the Office of the Clerk of the County of Nassau on February 19, 1953 as map Number 5716;

RUNNING THENCE north 7°18'17" east, 1054.82 feet,

THENCE south 82°41'43" east, 250.45 feet to the westerly line of lands of the Long Island Railroad,

THENCE south 7°09'00" west along lands of the Long Island Railroad, 1421.18 feet,

THENCE south 82°06'30" west, 195.90 feet to the easterly side of Dumond Place,

THENCE north 7°13'00" west along the easterly side of Dumond Place, 50.00 feet;

THENCE north 82°49'00" east, 100.00 feet;

THENCE north 7°11'00" west, 164.64 feet;

THENCE south 86°03'00" west 68.17 feet;

THENCE north 4°29'00" west, 202.54 feet, to the point or place of BEGINNING.

Containing a land area of: 7.75 acres

APPENDIX

D EXCAVATION WORK PLAN

APPENDIX D – EXCAVATION WORK PLAN

This Excavation Work Plan (EWP) has been prepared as an appendix to the Site Management Plan (SMP) for the former TransTechnology Corporation (TTC) facility in Glen Head, New York. Detailed discussions of the TTC site and the need for this EWP are provided in the SMP. The EWP does not provide a complete listing of all requirements that may be applicable to the work. Local, state, and federal requirements for sediment and erosion control, construction site dust control, and air monitoring may apply to the work in addition to the requirements outlined in this document.

The EWP must be implemented in all instances where excavation is to occur in areas with Remaining Contamination or Discovered Contamination, as defined below:

- Remaining Contamination refers to the management of soil within either designated area that contain concentrations of chemicals of concern greater than the Residential or Restricted Residential end land use soil cleanup objectives (SCOs) listed in 6 New York Codes, Rules and Regulations (NYCRR) Part 375-1.8(g)(2), depending on the location on the site (Section 2.5 and Figure 6 of the SMP); and,
- Discovered Contamination refers to the management of soil that may be discovered during site activities that exhibits evidence of suspected contamination or is confirmed by testing to exceed one or more of the relevant Part 375 SCOs. Tables 1 and 2 provide a listing of the site-specific chemical testing requirements and concentration limits. Section D-11 addresses the contingency procedures that are to be followed when Discovered Contamination is encountered.

The EWP is not required if soil that meets the relevant Part 375 SCOs is disturbed (however, if removed from the site, this soil must be managed in accordance with Section C-4 and C-5 of this EWP). Similarly, a Community Air Monitoring Plan (CAMP) is not required for activities that are not covered under this EWP, unless work is being performed to address a new spill or release that is unrelated to the historical site conditions.

D-1 NOTIFICATION

At least 5 business days prior to the start of any activity that is anticipated to disturb Remaining Contamination (as defined in the SMP) the site owner or their representative will notify the New York State Department of Environmental Conservation (NYSDEC). For Discovered Contamination, the site owner or their representative will notify NYSDEC within 5 business days of identifying Discovered Contamination. Currently, this notification will be made to:

Ms. Tara L. Rutland, Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation; Remedial Bureau A
625 Broadway, 11th Floor
Albany, NY 12233-7015
Phone: (518) 402-9621
Fax: (518) 402-9627

This notification will include:

- A detailed description of the work to be performed, including the location and areal extent, plans for site re-grading, intrusive elements, or utilities to be installed, estimated volumes of contaminated soil to be excavated (and the identity of the qualified individual who will be making the volumetric determinations), and any work that may impact an engineering control.
- A summary of environmental conditions anticipated in the work areas, including the nature and concentrations of chemicals of concern, potential presence of grossly contaminated media, and plans for any pre-construction sampling.
- A schedule for the work, detailing the start and completion of all intrusive work.
- A summary of the applicable components of this EWP including the CAMP (simple excavations may only require compliance with a portion of the EWP).
- If deemed necessary for the work activity, a copy of the CAMP. If a CAMP is deemed not to be necessary, then the rationale for this decision must be included with the notification.
- A statement that the work will be performed in compliance with this EWP, the SMP, and 29 Code of Federal Regulations (CFR) 1910.120.
- A copy of the contractor's health and safety plan (HASP) if it differs from the HASP provided in Appendix F of this SMP.
- Identification of disposal facilities for potential waste streams.
- Identification of sources of any anticipated backfill, along with certification from the fill site owner or operator that the material is not from an industrial source and there is no knowledge or evidence of chemical contamination.

D-2 SOIL SCREENING METHODS

Visual, olfactory, and instrument-based soil screening will be performed by a qualified environmental professional during all remedial and development excavations in areas where there is known or potentially contaminated material (i.e., Remaining Contamination or Discovered Contamination).

Excavated soils will be segregated based on previous environmental data and screening results into (1) material that requires offsite disposal (Remaining Contamination areas), (2) material that requires testing (Discovered Contamination areas), or (3) material that can be reused at the site (areas outside of [1] and [2] because soil is not suspected or known to contain chemical constituents above the relevant SCOs).

D-3 SOIL STAGING METHODS

Soil stockpiles will be continuously encircled with a berm and/or silt fence. Hay bales will be used as needed near catch basins, surface water receptors, and other discharge points. When not being accessed, the stockpiles will be kept covered with appropriately anchored tarps and will be routinely inspected (at a minimum once each week) and after every storm event. Damaged tarp covers will be promptly replaced.

Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC.

D-4 MATERIALS EXCAVATION AND LOAD OUT

A qualified environmental professional or person under their supervision will oversee all invasive work covered by this plan and the excavation and load-out of all excavated material. The owner of the property and its contractors are solely responsible for safe execution of all invasive and other work performed under the EWP.

The presence of utilities will be investigated by the site owner, the site owner's contractor, or the qualified environmental professional. It will be determined whether a risk or impediment to the planned work under this SMP is posed by utilities or easements on the site.

Loaded vehicles leaving the site will be appropriately lined, tarped, securely covered, manifested, and placarded in accordance with appropriate federal, state, local, and New York State Department of Transportation (NYSDOT) requirements (and all other applicable transportation requirements).

A truck wash will be operated onsite. The qualified environmental professional will be responsible for ensuring that all outbound trucks will be washed at the truck wash before leaving the site until the activities performed under this section are complete. Truck wash waters will be collected and disposed of offsite in an appropriate manner in compliance with applicable local, state, and federal laws and regulations.

Locations where vehicles enter or exit the site shall be inspected daily for evidence of off-site soil tracking. The qualified environmental professional will be responsible for ensuring that all egress points for truck and equipment transport from the site are clean of dirt and other materials derived from the site during intrusive excavation activities. Cleaning of the adjacent streets will be performed as needed to maintain a clean condition with respect to site-derived materials.

D-5 MATERIALS TRANSPORT OFF-SITE

All transport of contaminated soil will be performed by licensed haulers in accordance with appropriate local, state, and federal regulations, including 6 NYCRR Part 364. Haulers will be appropriately licensed and trucks properly placarded.

Material transported by trucks exiting the site will be secured with tight-fitting covers. Loose-fitting canvas-type truck covers will be prohibited. If loads contain wet material capable of producing free liquid, truck liners will be used. Loaded vehicles leaving the site will be manifested and placarded in accordance with appropriate federal, state, local requirements including NYSDOT requirements. If required, soil and waste management and transportation shall be performed in accordance with the federal Resource Conservation and Recovery Act and associated NYSDEC regulations pertaining to hazardous waste manifests.

Truck transport routes will satisfy local codes and weight restrictions. All trucks loaded with site materials will exit the vicinity of the site using only these approved truck routes. The truck routes will consider: (a) limiting transport through residential areas and past sensitive sites; (b) use of city mapped truck routes; (c) prohibiting off-site queuing of trucks entering the facility; (d) limiting total distance to major highways; (e) promoting safety in access to highways; (f) overall safety in transport; and (g) obtaining community input, where necessary.

Queuing of trucks will be performed on-site to minimize off-site disturbance. Off-site queuing[23] will be prohibited.

D-6 MATERIALS DISPOSAL OFF-SITE

Soil/fill/solid waste excavated and removed from the site that is deemed to contain chemicals of concern above the Unrestricted SCOs will be treated as contaminated and regulated material. As appropriate, this material will be transported and disposed in accordance with all local, state (including 6 NYCRR Part 360 for media regulated as a non-hazardous waste and 6 NYCRR Part 370 to 376 for media regulated as a hazardous waste), and federal regulations. If disposal of material from this site is proposed for unregulated off-site disposal (i.e., clean soil removed for development purposes), a formal request with an associated plan will be made to the NYSDEC. Unregulated off-site management of materials from this site will not occur without formal NYSDEC approval.

Off-site disposal locations for excavated soils deemed to contain chemicals of concern above the Unrestricted land use SCOs detailed in Part 375 will be identified in the pre-excavation notification. This will include estimated quantities and a breakdown by class of disposal facility if appropriate (i.e., hazardous waste disposal facility, solid waste landfill, petroleum treatment facility, construction, and debris recycling facility, etc.). Actual disposal quantities and associated documentation will be reported to the NYSDEC as part of the Periodic Review Report (PRR). This documentation will include waste profiles, test results, facility acceptance letters, manifests, bills of lading, and facility receipts.

D-7 MATERIALS REUSE ON-SITE

"Reuse on-site" means reuse on-site of material that originates at the site and which does not leave the site during the excavation. Reuse of soil from the areas of Remaining Contamination will not be allowed. If this material is excavated for development purposes, the material shall be disposed of offsite in accordance with Section C-6 above.

Soil that is suspected of being Discovered Contamination that is later characterized to not contain chemicals of concern above the site-specific SCOs can be reused on-site. If soil from Parcel B is planned for fill material on Parcel A, the soil must be stockpiled and tested in accordance with DER-10 to ensure it meets the applicable Part 375 Residential end land use SCOs for Parcel A.

D-8 FLUIDS MANAGEMENT

All liquids to be removed from the site, including excavation dewatering, leaching pit and cesspool dewatering, and groundwater monitoring well purge and development waters (if applicable), will be handled, transported, and disposed of in accordance with applicable local, state, and federal regulations. Dewatering, purge, and development fluids will not be recharged back to the land surface or subsurface of the site, but will be managed off-site, unless prior written approval is received from NYSDEC. Discharge of water generated during large-scale construction activities to surface waters (i.e., a local pond, stream, or river) may be performed under a State Pollution Discharge Elimination System (SPDES) permit.

D-9 BACKFILL FROM OFF-SITE SOURCES

All imported soils used to backfill areas of Known Contamination or Discovered Contamination will meet the backfill and cover soil quality standards established in 6 NYCRR 375-6.7(d), as follows:

The backfill brought to the site for use as a cover will be comprised of soil or other unregulated material as set forth in 6 NYCRR Part 360. The imported soil will not exceed the applicable soil cleanup objectives for the use of the site, as set forth in 6 NYCRR Part 375-6.8(b), and this SMP. For residential and restricted-residential use, the lower of the protection of groundwater or the protection of public health soil cleanup objectives is the regulatory guidance value. For each source of backfill that is imported to the site, one of the following will be completed prior to importing the backfill:

1. Documentation will be provided to NYSDEC as to the source of the material and the consistency of the material in accordance with the exemption for not chemical testing listed in DER-10, Section 5.4(e)(5); or
2. Chemical testing will be completed in accordance with Table 5.4(e)10 of DER-10.

If laboratory analytical testing is conducted, the results for each new source of fill must meet the values provided in Appendix 5 of DER-10 for restricted residential use.

Materials proposed for import onto the site, will be approved by a qualified environmental professional, and will follow provisions in this EWP and the SMP prior to receipt at the site. Material from industrial sites, spill sites, or other environmental remediation sites or potentially contaminated sites will not be imported to the site. Solid waste will not be imported onto the site.

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[23] Trucks will be prohibited from stopping and idling in the neighborhood outside the project site.

Trucks entering the site with imported soils will be securely covered with tight fitting covers. Imported soils will be stockpiled separately from excavated materials.

D-10 STORM WATER POLLUTION PREVENTION

All work at the site shall comply with the requirements of New York State Standards and Specifications for Erosion and Sediment Control, August 2005 (or recent revision). At a minimum, barriers, hay bale checks, and other erosion control measures will be installed around the perimeter of the excavation and inspected once a week and after every storm event. Results of inspections will be recorded in a logbook and maintained at the site and available for inspection by NYSDEC. All necessary repairs shall be made immediately. Accumulated sediments will be removed as required to keep the barrier and hay bale check functional. For larger excavations, procedures for storm water pollution prevention should be specified, including a storm water pollution prevention plan[24] (SWPPP). The required SWPPP contents, current as of the date of this plan, are provided in Table 1.

All undercutting or erosion of the silt fence toe anchor shall be repaired immediately with appropriate backfill materials. Manufacturer's recommendations will be followed for replacing silt fencing damaged due to weathering. Where discharge locations or points are accessible, they shall be inspected to ascertain whether erosion control measures are effective in preventing significant impacts to receiving waters.

D-11 CONTINGENCY PLAN FOR SOIL SUSPECTED OF CONTAINING CONTAMINATION

If soil suspected of containing Discovered Contamination is identified during post-remedial subsurface excavations or development related construction, excavation activities will be suspended until the soil is characterized.

The soil characterization will involve collecting samples to determine if the material warrants management as a waste. Initially, chemical analysis will be performed for a full list of analytes (i.e., Target Analyte List [TAL] metals; Target Compound List [TCL] volatiles and semi-volatiles, TCL pesticides, and polychlorinated biphenyls [PCBs]), unless the site history and previous sampling results provide a sufficient justification to limit the list of analytes. In this case, a reduced list of analytes will be proposed to the NYSDEC for approval prior to sampling. The characterization data will be compared to the relevant SCOs to evaluate whether the soil meets the definition of Discovered Contamination. The sampling and analytical methods presented in *DER-10 - Technical Guidance for Site Investigation and Remediation* must be followed during the characterization process.

Identification of unknown or unexpected contaminated media identified either by visual observation, instrument screening, or chemical analysis, during invasive site work will be promptly communicated by phone to NYSDEC's Project Manager. In addition, the exposed Discovered Contamination will be securely covered, and the notification process outlined in Section D-1 will be implemented. Reportable quantities of petroleum product will also be reported to the NYSDEC spills hotline. These findings will be also included in the Periodic Review Report prepared pursuant to the SMP.

D-12 SOIL CONFIRMATION SAMPLING

Confirmation soil samples following the excavation will be collected following the guidance provided in Section 5.4(b)(5) of DER-10. The analytical parameters will be limited to those chemicals that exceeded the site-specific SCOs. If the analytical data for the confirmation samples are below the site-specific SCOs, the excavated area will be backfilled in accordance with Section D-7. If the data indicate residual chemical concentrations above the site-specific SCOs, then additional soil will be excavated from the impacted area and the area re-sampled. This process will be repeated until the SCOs are achieved. Analytical data submitted to the NYSDEC will be managed in accordance with the NYSDEC's Electronic Data Deliverable Manual (version 3, January 11, 2013, or, if superseded, the most recent version of this document). At a minimum, this guidance requires data to be formatted to NYSDEC specifications, sample locations be located by survey, Global Positioning System, or other approved method, and specific sample identification nomenclature.

D-13 COMMUNITY AIR MONITORING PLAN

A CAMP will be implemented during all management activities associated with Remaining Contamination or Discovered Contamination, as appropriate. The plan will follow the guidance provided in Appendix 1A of *DER-10 - Technical Guidance for Site Investigation and Remediation*, Generic Community Air Monitoring Plan.

D-14 ODOR CONTROL PLAN

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[24] Under the SPDES General Permit for Storm Water Discharges from Construction Activities Permit No. GP-0-10-001, a storm water pollution prevention plan (SWPPP) that conforms to the requirements of NYSDEC Division of Water guidelines and NYS regulation is required for soil disturbance areas that total 1 acre in size, or greater.

Based on extensive experience at this site, odors are not expected during excavation activities. However, if odors are noted, this control plan, which is designed to control emissions of nuisance odors both onsite (if there are residents or tenants on the property) and offsite, will be implemented. Specific odor control methods to be used on a routine basis will include dust suppression, foam application, or other appropriate method. If nuisance odors are identified at the site boundary or if odor complaints are received, work will be halted, and the source of odors will be identified and corrected. Work will not resume until all nuisance odors have been abated. The NYSDEC and New York State Department of Health (NYSDOH) will be notified of all odor events and of any other complaints about the project. Implementation of all odor controls, including the slowing or suspension of work (if necessary), is the responsibility of the property owner's qualified environmental professional or remediation contractor. Any odor control measures that are implemented will be submitted to NYSDEC as part of the PRR.

All necessary means will be employed to prevent on and offsite nuisances. At a minimum, these measures will include: (a) limiting the area of open excavations and size of soil stockpiles; (b) shrouding open excavations with tarps and other covers; and (c) using foams or other means to cover exposed odorous soils. If odors develop and cannot be otherwise controlled, additional means to eliminate odor nuisances will include: (d) direct load-out of soils to trucks for off-site disposal; (e) use of chemical odorants in spray or misting systems; and (f) use of staff to monitor odors in surrounding neighborhoods.

D-15 DUST CONTROL PLAN

In the areas where soil containing Remaining Contamination or Discovered Contamination is to be excavated, a dust suppression plan that addresses dust management during invasive onsite work will be implemented, if necessary. The plan will include, at a minimum, the items listed below:

- Dust suppression will be achieved using a dedicated on-site water truck for road wetting. The truck will be equipped with water cannon capable of spraying water directly onto off-road areas including excavations and stockpiles.
- On-site roads will be limited in total area to minimize the area required for water truck sprinkling.

D-16 OTHER NUISANCES

The contractor shall utilize best work practices to minimize other nuisances, including noise. The contractor will ensure compliance with local ordinances, scheduling restrictions (limits on daily work duration, working weekends and holidays, etc.), and noise control ordinances, during any remedial work.

Excavation Work Plan – Table 1

Storm Water Pollution Prevention Plan Content Requirements

The NYSDEC General Permit for Storm water Discharges from Construction Activities (Permit No. GP-0-10-001) sets forth the following requirements for SWPPPs:

1 Erosion and sediment control component - All SWPPPs prepared pursuant to this permit shall include erosion and sediment control practices designed in conformance with the most current version of the technical standard, New York State Standards and Specifications for Erosion and Sediment Control. Where erosion and sediment control practices are not designed in conformance with this technical standard, the owner or operator must demonstrate equivalence to the technical standard. At a minimum, the erosion and sediment control component of the SWPPP shall include the following:

a. Background information about the scope of the project, including the location, type, and size of project;

b. A site map/construction drawing(s) for the project, including a general location map. At a minimum, the site map shall show the total site area; all improvements; areas of disturbance; areas that will not be disturbed; existing vegetation; on-site and adjacent off-site surface water(s), wetlands and drainage patterns that could be affected by the construction activity; existing and final slopes; locations of different soil types with boundaries; material, waste, borrow or equipment storage areas located on adjacent properties; and location(s) of the storm water discharge(s);

c. A description of the soil(s) present at the site, including an identification of the Hydrologic Soil Group (HSG);

d. A construction phasing plan and sequence of operations describing the intended order of construction activities, including clearing and grubbing, excavation and grading, utility and infrastructure installation and any other activity at the site that results in soil disturbance;

e. A description of the minimum erosion and sediment control practices to be installed or implemented for each construction activity that will result in soil disturbance. Include a schedule that identifies the timing of initial placement or implementation of each erosion and sediment control practice and the minimum time frames that each practice should remain in place or be implemented;

f. A temporary and permanent soil stabilization plan that meets the requirements of the most current version of the technical standard, New York State Standards and Specifications for Erosion and Sediment Control, for each stage of the project, including initial land clearing and grubbing to project completion and achievement of final stabilization;

g. A site map/construction drawing(s) showing the specific location(s), size(s), and length(s) of each erosion and sediment control practice;

h. The dimensions, material specifications, installation details, and operation and maintenance requirements for all erosion and sediment control practices. Include the location and sizing of any temporary sediment basins and structural practices that will be used to divert flows from exposed soils;

i. A maintenance inspection schedule for the contractor(s) identified in Part III.A.6., to ensure continuous and effective operation of the erosion and sediment control practices. The maintenance inspection schedule shall be in accordance with the requirements in the most current version of the technical standard, New York State Standards and Specifications for Erosion and Sediment Control;

j. A description of the pollution prevention measures that will be used to control litter, construction chemicals and construction debris from becoming a pollutant source in the storm water discharges;

k. A description and location of any storm water discharges associated with industrial activity other than construction at the site, including, but not limited to, storm water discharges from asphalt plants and concrete plants located on the construction site; and

l. Identification of any elements of the design that are not in conformance with the requirements in the most current version of the technical standard, New York State Standards and Specifications for Erosion and Sediment Control. Include the reason for the deviation or alternative design and provide information which demonstrates that the deviation or alternative design is equivalent to the technical standards.

APPENDIX

E SITE MANAGEMENT ANNUAL REPORTING FORM

Site Management Plan Annual Reporting Form
Former TransTechnology Property
Glen Head, New York

After Conducting an Annual Inspection, a Certified Copy of this Form must be mailed to:

Ms. Tara L. Diaz, Project Manager
New York State Department of Environmental Conservation
Division of Environmental Remediation; Remedial Bureau A
625 Broadway, 11th Floor
Albany, NY 12233-7015
Phone: (518) 402-9621
Fax: (518) 402-9627

Property Address:_____

Inspector:_____ Affiliation:_____

Inspector Address:_____

Phone Number:_____ Date:_____

Arrival Time:_____ Departure Time:_____

Weather Conditions:_____

Section 1 – Contaminated Soil Identification

1. During the past year, was soil excavated in an area designated to have Known Contamination[1]? (See attached figure for areas and depths of Known Contamination.)

   Yes ☐ No ☐

2. Were any areas of Suspected Contamination[2] identified?
   Yes ☐ No ☐

If yes, describe nature of contamination: _____

_____

Attach description of waste characterization sampling and data.

[1] "Known Contamination" is defined as soil within one of the four designated areas that contains concentrations of chemicals of concern greater than the restricted residential SCOs. The Known Contamination is present at the depths shown on the attached figure. Soil above these depths is not considered Known Contamination and can be managed as non-contaminated.

[2] "Suspected Contamination" is soil that may be discovered during the course of site activities that exhibits visible, olfactory, or other evidence of contamination. Suspected contamination must be characterized following the procedures outlined in the Site Management Plan.

3. If the answer to any of the above questions is yes, please provide the following information:
   - Was NYSDEC notified: Yes ☐ No ☐
     If yes, please provide date: _____
   - Was soil characterized as a non-hazardous waste? Yes ☐ No ☐
     hazardous waste? Yes ☐ No ☐
   - Provide dates of excavation: _____
   - Provide volume of excavated soil:_____
   - Attach figure showing excavation location and verification sample locations?
   - Attach post-excavation verification data and locations?
     Note: A site-specific Health & Safety Plan is required if any contaminated soil is excavated.

Section 2 - Vapor Mitigation System

4. Subslab depressurization system inspection:
   - Fan(s) is operating? Yes ☐ No ☐
   - Manometer(s) is recording pressure differential? Yes ☐ No ☐
   - Pressure differential is negative? Yes ☐ No ☐
     - Provide manometer reading #1_____
     - Provide manometer reading #2_____ (if there is a second manometer)
   - Is Dranjer(s) drains operating properly Yes ☐ No ☐
   - Is exhaust stack(s) functioning properly and free of holes or other damage?
     Yes ☐ No ☐
   - Was a system repair(s) made during reporting year? Yes ☐ No ☐
     If yes, please describe
     repair(s):_____
     _____
     _____
     _____
     Repair(s) date:_____

- Is any type of corrective action deemed necessary to repair the sub-slab depressurization system? Yes ☐ No ☐
  If yes, please describe the corrective
  action:_____
  _____
  _____
  _____
  Note: the NYSDEC must be notified when the corrective action is completed.

5. Vapor barrier inspection:
   - Did any vapor barrier breaches (holes or cracks) occur during the reporting year?
     Yes ☐ No ☐
     If yes, please describe the repair(s):_____
     _____
     _____
     _____
     Repair(s) date:_____

6. Basement floor inspection:
   - Were any repair(s) made to the basement floor during the reporting year?
     Yes ☐ No ☐
   - If yes, please describe the repair(s):_____
     _____
     _____
     _____
     Repair(s) Date:_____
   - Are there any visible cracks, fissures, or other damages to the basement floor or foundation that could enable vapor from under the basement to seep into the house?
     Yes ☐ No ☐
   - If yes, please describe the corrective action to be taken:_____
     _____
     _____
     _____
     Note: the NYSDEC must be notified when the corrective action is completed.

Section 3 – Institutional and Engineering Controls

7. Is groundwater at the property being extracted for uses other than monitoring or remediation? Yes ☐ No ☐
   If yes, notify NYSDEC immediately.

8. An institutional control is recorded on the property deed that prohibits:
   a. vegetable gardens
   b. raising livestock or animal products for human consumption; and,
   c. single family homes, unless under a condominium association.
      - Are vegetable gardens present? Yes ☐ No ☐
      - Is the property being used for raising livestock or animal products for human consumption? Yes ☐ No ☐
      - Is the property being used as a single family home under an ownership structure that is not a condominium association? Yes ☐ No ☐

      If the answer to either of the above questions is yes, notify NYSDEC immediately.

Section 4 - Certification

For each institutional or engineering control identified for the site, I certify that all of the following statements are true:

- The inspection of the site to confirm the effectiveness of the institutional and engineering controls required by the remedial program was performed under my direction.
- The institutional control and/or engineering control employed at this site is unchanged from the date the control was put in place, or last approved by the Department.
- Nothing has occurred that would impair the ability of the control to protect the public health and environment.
- Nothing has occurred that would constitute a violation or failure to comply with any site management plan for this control.
- Access to the site will continue to be provided to the Department to evaluate the remedy, including access to evaluate the continued maintenance of this control.
- Use of the site is compliant with the environmental easement.
- To the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program.
- I am a qualified environmental professional as defined by 6 NYCRR Part 375-1.2(ak).
- The information presented in this report is accurate and complete.

I certify that all information and statements in this certification form are true. I understand that a false statement made herein is punishable as a Class “A” misdemeanor, pursuant to Section 210.45 of the Penal Law. I, [name], of [business address], am certifying as [Owner or Owner’s Designated Site Representative] (and if the site consists of multiple properties): [I have been authorized and designated by all site owners to sign this certification] for the site.

_____	_____	_____
Signature	Printed Name	Date

APPENDIX

F SITE-SPECIFIC HEALTH AND SAFETY PLAN

SHORT FORM HEALTH AND SAFETY PLAN

FORMER TRANSTECHNOLOGY CORPORATION

BREEZE-EASTERN LLC

PROJECT NO.: 31400522.000
DATE: SEPTEMBER 1, 2022

WSP USA
13TH FLOOR
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SIGNATURES

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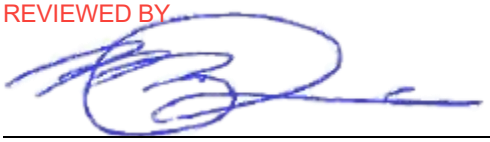

Michael Donaldson
Health and Safety Manager
Central Region and Earth & Environment

This Health and Safety Plan (HASP) was prepared by WSP USA (WSP) for our client, Breeze-Eastern LLC, in accordance with the master services agreement, dated October 4, 2017. The disclosure of any information contained in this report is the sole responsibility of the intended recipient. The material in it reflects WSP's best judgement in light of the information available to it at the time of preparation. Any use which a third party makes of this report, or any reliance on or decisions to be made based on it, are the responsibility of such third parties. WSP accepts no responsibility for damages, if any, suffered by any third party that are the result of decisions made or actions based on this report. This limitations statement is considered part of this report.

The original of the technology-based document sent herewith has been authenticated and will be retained by WSP for a minimum of ten years. Since the file transmitted is now out of WSP's control and its integrity can no longer be ensured, no guarantee may be given with regards to any modifications made to this document.

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	Site topography
	Accessibility by road and air
	Contaminants of concern
	Site security
	Obtain detailed WSP work plan
	Review WSP's standard operating procedures (SOPs)
	Underground utility clearance and communication record (WSP SOPs)
	Decontamination procedures (WSP SOPs)
	National Institute for Occupational Safety and Health (NIOSH) pocket guide pages for all constituents
	HAZWOPER Certificates
	Respirator fit test forms
	First-aid/CPR cards
	All form fields in the Health and Safety Plan (HASP) completed
	HASP reviewed by competent WSP staff member
	Project manager reviewed HASP and signed signature page
	All WSP site personnel signed signature page

1 INTRODUCTION

Table 1.1 Site Location and Contact Information

Project No.	31400522.000
Site Name	Former TransTechnology Corporation Facility
Street Address	1 Robert Lane
City	Glen Head
State/Country	New York
Site Contact	John Simon (Gnarus LLC, on behalf of Breeze-Eastern LLC)
Phone Number	(202) 505-1906
Start Date of Work	August 1, 2021 (current version of HASP)
Projected End Date of Work	Ongoing

1.1 ORGANIZATIONAL STRUCTURE

Every health and safety plan (HASP) WSP prepares is organized to ensure that information regarding site conditions, potential exposure to hazards, and worker safety flows freely within the project team. The HASP also establishes a chain of command with lines of authority, responsibility, and communication, as required by the Occupational Safety and Health Administration (OSHA). Each project will have a *General Supervisor* (as designated by OSHA), a *Task Manager*, and a *Site Health and Safety Coordinator* (SHSC). The *General Supervisor* is typically the WSP project director who is ultimately responsible for the overall implementation of the project. The project director's role as the *General Supervisor* is to staff and support the work appropriately. This includes securing company funds for the personal protective equipment (PPE) and monitoring equipment recommended for the site in this HASP.

The designated *Task Manager* is responsible for the safe and proper implementation of the work plan activities detailed below. They have authority to expend company resources for PPE and other safety equipment. The *Task Manager* oversees all field work associated with the project and will communicate with the project director regarding implementation of the work. The SHSC is responsible for the implementation of this HASP. The SHSC will communicate any issues with changing site conditions, upgrades in PPE, decontamination procedures and needs for monitoring equipment with the *Task Manager*. The SHSC will confirm that other workers[1] assigned to the project are following the HASP.

It is expected that all other employees assigned to the project will follow the HASP and report all potential safety concerns to the SHSC.

[1] Other personnel required to conduct the proposed work will be assigned to the project and this HASP, as appropriate.

1.2 PERSONNEL ASSIGNMENTS

Certificates documenting the training for field personnel are provided in Appendix A.

Table 1.2 Project Personnel

Project Manager	Dave Bouchard
Task Manager	
SHSC	
Field Personnel	
Field Personnel	

2 SITE BACKGROUND

The former TransTechnology Corporation (TTC) facility is located at 1 Robert Lane, Glen Head, Nassau County, New York (Figure 1). The facility formerly consisted of a 96,000-square-foot main manufacturing building with several smaller outbuildings that was originally developed in the late 1950s (Sheet 1). The plant was used to produce aircraft actuators, printed circuit boards, and other computer components operating first as Lundy Electronics Company through 1984; and, after its purchase, as TTC[2] until the factory was decommissioned in 1994. Portions of the main and outbuildings were leased to small business from the mid-1990s through 2004, after which the site was vacated in preparation for the remedial work. The property is currently unoccupied, and all the onsite buildings have been razed in advance of redevelopment. No above grade features remain at the site except for limited areas of pavement near the facility entrance (i.e., Robert Lane).

The rectangular-shaped 7.75-acre site is in a mixed-use commercial and residential area of Long Island (Sheet 2). The property is bordered to the north by a Nassau County storm water recharge basin and North Shore High School; to the east by the Long Island Railroad; the south by mixed residential and commercial properties and a water tower; and to the west by residential properties along Dumond Place and Todd Drive East (Todd Estates).

The site is accessible by road via paved drive leading from Dumond Place, which connects to Robert Lane (Sheets 1 and 2). The site is also accessible by air, if necessary.

2.1 PREVIOUS INVESTIGATIONS AND REMEDIATION

Chlorinated volatile organic compounds (VOCs), including trichloroethene (TCE; used at the plant until 1978 for vapor degreasing and chrome plating), were first detected in the early 1990s during the removal of an underground fuel oil tank (Sheet 1). The findings resulted in several follow-up environmental investigations in the late 1990s and early 2000s designed to characterize the soil in and around suspected source areas, and further evaluate the extent of chlorinated VOCs in the groundwater. The investigations included onsite borings to delineate affected soil; the installation (and sampling) of 11 groundwater monitoring wells, designated TT-MW-01 through TT-MW-11, screened[3] in the upper portion of the water table (at approximately 110 feet below ground surface [bgs]); and soil gas (vapor) sampling points in and around the buildings. Affected soil was detected in surface and subsurface samples, and in select drainage structures (catch basins, leach pits, and cesspools) associated with the facility. The soil samples revealed concentrations of chlorinated VOCs, and, in select locations, metals (including chromium), and polycyclic aromatic hydrocarbons (PAHs).

Groundwater monitoring well samples collected during the early investigations contained up to 1,800 micrograms per liter (µg/l) of TCE and 16,000 µg/l of tetrachloroethene (PCE) with substantially lower concentrations of *cis*-1,2-dichloroethene (*cis*-1,2-DCE), and vinyl chloride. The dissolved TCE, when plotted, appeared to outline a shallow (i.e., in the upper 10 to 20 feet of the water-bearing zone) groundwater plume extending from the southeast corner of the facility (near the former vapor degreasing and chrome plating operations) north-northwest towards the property line along the interpreted groundwater flow direction (Sheet 1). Concurrent onsite soil gas samples collected during the groundwater investigation showed a similar pattern of TCE-affected soil gas. The distribution of the PCE in groundwater and soil gas, which was detected primarily in the southern portion of the site away from the former manufacturing areas of the facility, suggested an offsite upgradient release.

The New York State Department of Environmental Conservation (NYSDEC), based on these (and other) findings, listed the former TTC facility as a Class 2 Inactive Hazardous Waste Disposal site (#1-30-101) and launched separate investigations (the *2000 Preliminary Site Assessment for the Glen Head Region Groundwater Plume* and, later, the *2007 Site*

[2] TransTechnology Corporation changed its name to Breeze-Eastern, the current owners of the site, in 2006.

[3] All onsite monitoring wells were screened in similar geologic materials consisting primarily of coarse sand and gravel with occasional silty and micaceous sand interbeds and clay seams. These materials are comparable with the descriptions of the Pleistocene-aged Upper Glacial and the upper portions of the Cretaceous-aged Magothy Formations, hydraulically connected unconsolidated units that underlie much of Long Island and are the primary source of potable water for Nassau County.

Characterization Report, Glen Head Groundwater Plume) into the suspected upgradient[4] release of PCE from nearby dry-cleaners (Sheet 2). The work also led to an *Order on Consent* (Index #WI-0913-02-02) filed with the Nassau County Clerk's Office by NYSDEC in May 2002. The order required that TTC undertake remedial work at the site to address the impacts to soil and groundwater beginning with a remedial investigation and feasibility study (RI/FS). Approval of the RI/FS work plan was granted in September 2002. The RI was conducted in 2003 with the FS completed in 2005.

2.1.1 REMEDIAL INVESTIGATION AND FEASIBILITY STUDY

The results of the 2003 RI investigations confirmed earlier findings revealing metals from past chrome plating operations and chlorinated VOCs from the facility's degreasers (Sheet 1). These constituents were present in surface soil (and, in limited locations, the subsurface soil); the soil gas and groundwater (chlorinated VOCs only); and, in the sediment within select subsurface drainage structures at the site. Concurrent groundwater monitoring determined that dissolved concentrations of both PCE and TCE were present, but only the TCE was attributable to the manufacturing activities at the site (the PCE was, as was previously concluded, likely the result of an offsite release at the nearby dry-cleaning facilities). The soil vapor investigation also revealed concentrations of PCE and TCE (and several other daughter products associated with these compounds) in the soil gas, which were not correlated with the impacted soil and were, instead, attributed to the affected groundwater.

The remedy outlined in the 2005 FS targeted affected soil and impacted subsurface drainage structures at the site. The NYSDEC approved the approach in the FS and, in June 2006, issued a 2006 *Record of Decision* (ROD[5]) for the remediation of affected soil at the site, designated as Operable Unit No. 1 (OU-1[6]). The ROD specified the excavation of organic and inorganic-impacted soil (primarily chlorinated VOCs and metals, respectively) for offsite disposal, and the remediation of the known subsurface drainage structures at the site.

Findings associated with the groundwater and soil gas, designated as Operable Unit No. 2 (OU-2), presented in the 2005 FS are detailed below.

OPERABLE UNIT NO. 1 REMEDIATION

The first phase of soil remediation was performed in the summer and early fall of 2009. The activities included the excavation of impacted surface soil in locations distributed around the main and outbuildings (designated with the SURF prefix); select deeper excavations to address identified affected (subsurface) soi1 (e.g., the B-5 excavation along the eastern property line); and the planned cleanout of the identified drainage structures (Sheet 1). Follow-up phases of remediation conducted between 2010 and 2012 included addressing previously unknown drainage structures (primarily catch basins and leach pools) discovered during the activities. The previously unknown structures were evaluated and remediated, as necessary, on an *ad hoc* basis after they were uncovered in the field.

The OU-1 remedial activities, completed in 2012, were documented in the *OU-1 Remedial Action Construction Completion Report* (CCR), dated November 9, 2015. The report detailed not only the soil and structure remediation at the site but included the *Interim Site Management Plan* (SMP). This document, which includes detailed the soil management areas (depicted on Sheet 1); the characteristics of, and the procedures for, managing *Discovered Contamination* (as defined in the SMP); and an *Excavation Work Plan* for any onsite (intrusive) activities, is being used to govern the post-closure investigation and remediation conducted at the site to support the redevelopment of the property.

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[4] The NYSDEC investigations focused on former and active dry-cleaning facilities south and southeast (upgradient) of the TTC facility, all of which had documented releases of PCE to the environment. Dissolved chlorinated VOCs, including PCE (10 to 18,000 µg/l), detected in groundwater monitoring well samples (installed south and west of the TTC site) outlined a plume extending from Glen Head Road (near the intersection of the LIRR tracks) northwest parallel to the regional groundwater flow direction. The affected groundwater (and an associated plume of chlorinated VOC-affected soil gas) was detected beneath the adjacent residential neighborhoods and the southern portion of the former TTC site.

[5] *Record of Decision*, TransTechnology, Operable Unit No. 1, Glen Head, Nassau County, New York, Site Number 1-30-101, dated June 2006.

[6] Affected groundwater and soil gas associated with the site were grouped as Operable Unit No. 2 (OU-2). The details regarding the OU-1 soil remediation and the OU-2 groundwater and soil vapor investigation (and soil vapor mitigation) are presented separately from the soil work in the *Operable Unit No. 2* Section below.

The NYSDEC approved the OU-1 CCR (and the accompanying SMP) in a letter, dated February 9, 2016. The approval acknowledged the completion (and closure) of the OU-1 soil remediation at the site.

2.1.2 OPERABLE UNIT NO.2 INVESTIGATION

The RI OU-2 activities evaluated the water quality conditions at the site and assessed the extent of affected groundwater. The investigation results supported the earlier investigation findings that the TCE-affected groundwater (and the co-located TCE dominated soil gas) was likely attributable to the TTC facility. The data also revealed that the TCE-based plume was comingled with the onsite portions of the PCE-dominated (regional) plume associated with the dry-cleaning facilities. The conclusion presented in the RI was that it would be technically impractical to remediate the relatively minor TCE-affected groundwater without addressing the larger, regional plume and, because of a lack of current or (likely) future use of the onsite groundwater for potable purposes, remediation was not warranted.

The NYSDEC provided comments based on the RI data and requested additional delineation of the groundwater flow direction and offsite extent of VOCs in groundwater (the findings in the RI led to the erroneous conclusion that the TCE-affected groundwater had not migrated offsite). Repeat groundwater monitoring and property line groundwater profiling (at locations GP-1 and GP-2) performed in response to the Department's request verified that dissolved TCE was present at the downgradient edge of the site warranting additional offsite investigation (Sheets 1 and 2).

SUPPLEMENTAL GROUNDWATER REMEDIAL INVESTIGATION

Follow-up groundwater investigations between 2010 and 2012 used multi-depth *offsite* groundwater profiling, concurrent soil gas sampling, and additional monitoring of the onsite and offsite groundwater wells to further evaluate the extent of affected groundwater (Sheet 2). The groundwater analytical data revealed that the previously described plume of TCE-affected groundwater originating from the manufacturing areas of the former site (i.e., the former vapor degreasing and chrome plating and area; Sheet 1) extended beyond the western property line. The defined plume is approximately 1,200-feet-long, relatively narrow (approximately 400 feet wide at the western property line) and is present beneath the adjacent Todd Estates and the neighborhood beyond Glen Cove Avenue. The TCE plume was found to be comingled with the regional PCE plume, which was significantly larger than previously understood extending from the nearby dry cleaners to the northwest beneath the southern portion of the TTC site and most of the adjoining neighborhoods. A general outline of the affected groundwater from both plumes is depicted on Sheet 2.

Vapor sampling performed concurrent with the groundwater profiling activities indicated TCE and PCE were present in the shallow soil gas in locations directly over the groundwater plumes. Follow-up indoor air and sub-slab soil gas testing in residences directly adjacent the former TTC facility resulted in the NYSDEC-approved installation and operation of vapor mitigation systems in two homes and annual indoor air monitoring in two additional homes (Sheet 2).

WSP implemented an annual indoor air monitoring and mitigation system inspection regime, and a voluntary groundwater monitoring program at the site following supplemental groundwater investigations. Both programs are ongoing with indoor air sampling conducted in select homes on an annual basis and groundwater sampled on a semiannual basis. The sampling procedures (and the associated risks) for the vapor and groundwater monitoring activities are detailed in the *Current Onsite Activities Section* (Section 3) below.

2.2 POST-CLOSURE ACTIVITIES

Post-closure activities were conducted to facilitate the sale and redevelopment of the property. The work, begun in 2016, consisted of demolition of the main and outbuildings; an evaluation of the soil beneath the former main building slab; and the in-place pre-characterization of the site-wide surface and, in select locations, subsurface soil (Sheet 1). The activities also included the abandonment (by removal or partial deconstruction) of the subsurface drainage structure drainage structure network[7] at the site. The decommissioning work was performed on the previously remediated structures and additional pits or

[7] The location of the 77 structures identified in the dedicated subsurface drainage network is not shown on Sheet 2, for clarity. Additional information regarding the abandonment of the structures is presented in the *Subsurface Drainage Structure Abandonment and Soil Remediation Report* on July 22, 2019, and the Additional Subsurface Drainage Structure Abandonment Activities *Letter Report*, dated June 10, 2020.

basins uncovered during the abandonment activities (after they were remediated following the procedures used during the OU-1 activities). Any potentially affected soil identified around the structures or the associated piping during the uncovering process was addressed following the procedures outlined in the *Excavation Work Plan* of the SMP.

The subsurface abandonment work was performed between 2016 and 2019. A total of 77 subsurface structures were abandoned in accordance with the approved engineering procedures. The site was subsequently graded and vegetated to minimize runoff and stabilize the ground surface.

Periodic inspections are conducted at the site to ensure that the storm water controls at the site (grading, silt fence, ground cover, etc.) remain in place and are functioning as designed. The inspection regime is detailed in the *Current Onsite Activities Section* (Section 3) below.

2.3 CHEMICALS OF CONCERN

The four chlorinated VOCs listed above (PCE, TCE, *cis*-1,2-DCE, and vinyl chloride) are the primary constituents of concern at the site and are potentially present in the soil gas and groundwater. These compounds, along with metals and select PAHs, were excavated for offsite disposal during the OU-1 remediation and the subsequent post-closure activities and, except for the soil inside management areas depicted in the SMP (and on Sheet 1), are unlikely to be encountered as part of the activities listed in the scope of work.

National Institute of Occupational Safety & Health (NIOSH) data sheet (obtained from the NIOSH Pocket Guide) for each of the chlorinated VOCs listed above is presented in Appendix B.

3 CURRENT ONSITE ACTIVITIES

WSP has completed the OU-1 soil remediation and post-closure activities designed to prepare the site for sale and redevelopment. The current work at the site and the surrounding area (i.e., the study area) is focused on the affected groundwater and soil gas (as part of the OU-2 activities), the maintenance of storm water controls for the now vacated property, and limited surface soil sampling associated with the replacement[8] of the adjoining elevated water tank. The projected activities include:

Annual Vapor Monitoring and Mitigation Activities – Four homes in the Todd Estates neighborhood directly downgradient (west) of the former TTC facility were identified for sub-slab depressurization systems (SDSs; two homes) or, for the two homes not mitigated, annual indoor air monitoring. The annual activities include operation, monitoring, and maintenance (OM&M) inspections of the installed SSDs; and, for the remaining homes, concurrent sub-slab, indoor, and ambient (outdoor) air sampling. The procedures for each activity are detailed below.

Storm Water Pollution Prevention Plan Inspections – The *State Pollutant Discharge Elimination System (SPDES) General Permit for Storm Water Discharges from Construction Activity* permit issued for the site as part of the building demolition, subsurface drainage structure abandonments, and other redevelopment activities requires periodic inspections of the site. The inspections detailed in the associated *Storm Water Pollution Prevention Plan* (SWPPP), are intended to verify that all storm water controls at the site are working as designed. The inspection activities are summarized below.

Supplemental Groundwater Investigation Activities – The supplemental groundwater investigation includes groundwater profiling and concurrent groundwater monitoring well sampling (the procedures for the sampling are detailed in the section below). The investigation is intended to evaluate the current water quality conditions between the historical source area and the downgradient property line in advance of a groundwater focused feasibility study. The profiling will use a direct-push drill rig equipped groundwater sampling device. An outline of the scope of work is presented below.

Groundwater Monitoring – Periodic monitoring samples are collected from five onsite and seven offsite groundwater monitoring wells installed within the study area. The samples are for site-specific chlorinated VOCs and typically use passive diffusion bag samplers (PDBs). The PDB deployment and recovery procedures are detailed below.

Surface Soil Sampling – Surface soil samples will be collected to address a potential lead impact to the site (from lead-based paint) due to the abandonment and disassembly of a New York American Water (NYAW) elevated water tank on the adjacent site. An overview of the soil sampling procedures is provided below.

It is important to note that, while these activities are part of the current work at the site, other similar activities (e.g., monitoring well installation or soil borings) may be conducted in the future. The document will be modified for any proposed activities that are not detailed below, as necessary.

A summary of the planned work and the associated hazards are presented below.

3.1 ANNUAL VAPOR MITIGATION SYSTEM INSPECTIONS AND INDOOR AIR MONITORING

WSP is conducting annual vapor mitigation and monitoring activities at the former TTC facility. The work includes the annual OM&M inspection of SSD mitigation systems; and follow-up vapor monitoring in private residences near[9] the facility. These activities are a continuation of the offsite indoor air evaluation conducted in 2012, which identified the

[8] The Sea Cliff Operations District of New York American Water abandoned and replaced a 500,000-gallon elevated steel water tank (on the 0.25-acre lot located on 8 Dumond Place) in 2019 and 2020 using a leased portion of the former TTC property.

[9] The location of the homes with SSDs installed, and those where annual indoor air monitoring is conducted is not shown on the maps associated with this plan. See the *Offsite Indoor Air Evaluation Work Plan (Revision 1)*, dated March 1, 2012 for additional information regarding these private residences.

potential for impacts to the indoor air quality of nearby homes due to the presence of chlorinated VOCs in the underlying soil gas. Two homeowners elected to have mitigation systems installed with two additional homeowners agreeing to periodic (annual) vapor monitoring as a precautionary measure.

The inspection and sampling activities will be performed in accordance with the NYSDEC-approved *Work Plan for Vapor Mitigation Systems*, dated June 7, 2012; the *Offsite Indoor Air Evaluation Work Plan (Revision 1),* dated March 1, 2012; the New York State Department of Heath's (NYSDOH's) *Guidance for Evaluating Soil Vapor Intrusion in the State of New York*, dated May 2017; and WSP's SOPs. Sampling for the periodic monitoring will be limited to the site-related compounds: PCE, TCE, *cis*-1,2-DCE, and vinyl chloride.

3.1.1 ANNUAL VAPOR MITIGATION SYSTEM INSPECTIONS

The vapor mitigation system OM&M work is designed to ensure that the systems continue to operate satisfactorily. The work for the existing systems located at two homes on Todd Drive East will include:

- a visual inspection of the entire system including the fan (to ensure proper operation and continued effectiveness in providing the appropriate vacuum), piping, warning devices (liquid-filled manometers), labeling on the system, and any membranes installed as a soil vapor retarder;
- an examination of all sealed joints and cracks in the concrete floor, foundation walls, vacuum points; and,
- verification that no new air intakes for the home have been installed within the minimum distances (specified by the NYSDOH guidance) from the mitigation system exhaust discharge point (Sheet 2).

Any leaks or other minor SSD issues identified will be addressed by the WSP inspector, as appropriate. System components requiring repair work will be addressed as soon as possible (based on contractor availability) after the inspection has been completed.

3.1.2 ANNUAL SUBSLAB SOIL GAS AND INDOOR AIR EVALUATION

The onsite activities include sub-slab soil gas and indoor air sampling as part of an annual monitoring program for two homeowners in the Todd Estates neighborhood. The specific procedures for the work are detailed in the *Offsite Indoor Air Evaluation Work Plan*, dated March 1, 2012, and are summarized below.

PRE-SAMPLING INTERVIEW, BUILDING INSPECTION AND MATERIALS INVENTORY

A pre-sampling site inspection and materials inventory will be conducted at each property a minimum of two days before conducting the annual sampling activities. WSP will verify the building construction, complete the NYSDOH's required indoor air quality questionnaire with the homeowner, and catalogue (manufacturer's name, ingredients, etc.) any chemicals or other items stored in the basement (if present) and first floor living spaces that could potentially interfere with the vapor sampling. The containers will be scanned with a high-sensitivity photoionization detector (i.e., a RAE Systems ppbRAE®, or equivalent) for potential vapor emissions.

WSP will request, based on the findings of the inventory, that homeowners either remove any materials and equipment that are emitting VOCs from the structure, or seal the containers or equipment in plastic bags at least 24 hours before the scheduled sampling time. WSP will also discuss with the residents the activities that should be avoided within 24 hours of sample collection, as per the NYSDOH guidance.

SUB-SLAB SAMPLE COLLECTION

The sub-slab soil gas sampling[10] will use Vapor Pins® manufactured by Cox-Colvin of Plain City, Ohio, previously installed in each of the homes where annual monitoring is conducted. The pins were installed with self-sealing silicone sleeves (no grout or clay was required) in the basement of both homes and capped and fitted with protective flush-mounted covers.

The integrity of the probe seals may be verified using a tracer gas (in accordance with the NYSDOH guidelines) prior to sampling. Each sample point will be covered with a laboratory-supplied 18-inch-diameter stainless-steel dome equipped with two stainless-steel quick-lock fittings, or equivalent. The dome will be charged, and the sample point will be monitored for a period of 2 minutes to verify that the system is not short-circuiting to the helium atmosphere inside the dome. If helium is detected in the sample line, the seal will be repaired, and the process repeated until the results indicate the seal is competent.

The sub-slab soil gas samples will be collected by attaching an appropriately sized section of Teflon® or Teflon®-lined tubing to the Vapor Pin® and conducting a pre-sample purge to remove dilution air from the tubing and probe assembly. One to three probe volumes of air will be evacuated from each sample location at a rate not exceeding 0.2 liter per minute using a peristaltic pump, hand pump, or syringe. The purged air will be collected in a Tedlar® bag to prevent vapors from being released into the indoor air where they could interfere with the sampling process.

Sub-slab vapor samples will be collected using evacuated 1-liter Entech Instruments, Inc., (Entech) canisters, or equivalent, fitted with a 24-hour sample flow regulator pre-set by the analytical laboratory. The canister will be opened to commence sample collection, and the initial canister vacuum will be recorded in the field logbook. The canister will be closed (after the sample time has elapsed) and the flow regulator will be removed from the canister to complete the sample collection. The samples will be shipped, or transported by courier, under ambient conditions to a NYSDOH-approved laboratory for analysis of VOCs by U.S. Environmental Protection Agency (EPA) Method TO-15.

The Vapor Pin® sampling probes will be capped, and the flush-mounted protective covers replaced after the sampling activities have been completed.

INDOOR AND AMBIENT AIR SAMPLING

Indoor air samples will be collected from the basement and living space of each residence, as appropriate. In addition, concurrent ambient (i.e., outdoor) air samples will be collected approximately 3 to 5 feet above the ground using a tripod (or similar) and away from wind obstructions, if possible (e.g., trees, brush, wooden fences) in accordance with the NYSDOH Guidance.

The air samples will be collected using evacuated 1-liter Entech canisters, or equivalent, fitted with a sample flow regulator pre-set by the analytical laboratory. The canister will be opened to begin sample collection (the initial canister vacuum will be recorded in the field logbook), allowed to stand undisturbed for the collection time, and then closed and the flow regulator removed to complete the sample collection. The samples will be shipped under ambient conditions to a NYSDOH-approved laboratory for analysis of VOCs by EPA Method TO-15.

3.2 STORM WATER POLLUTION PREVENTION PLAN INSPECTIONS

WSP is conducting SWPPP inspections at the former TTC facility. The inspections are part of the requirements[11] of the SPDES *General Permit for Storm Water Discharges from Construction Activity* at the site and are intended to ensure that the controls and procedures detailed in the associated SWPPP have been implemented and are effective.

[10] Sub-slab vapor samples historically collected by installing a temporary probe through the home's concrete floor slab, as detailed in the 2012 *Offsite Indoor Air Evaluation Work Plan*. The conversion to Vapor Pins® was implemented in 2018. WSP does not anticipate installing temporary probes for future sub-slab sampling.

[11] As detailed in the *New York State Department of Environmental Conservation SPDES General Permit for Storm Water Discharges from Construction Activity*, date January 29, 2015.

The SWPPP requires a "self-inspection" of the site performed by a *qualified professional*[12]. The inspector will walk the site and verify:

- the erosion and sediment control practices implemented to minimize slope disturbance, channel formation, and sediment discharge from the site (e.g., silt fences, hay bales, vegetative covers, etc.) are performing as designed; and
- pollution prevention controls, including the truck decontamination station and other measures to prevent spills or exposure of materials that could leach compounds to the storm water, are being implemented at the site.

The frequency of the inspection is dependent on the onsite activities. The inspections will occur on a twice weekly basis during the period when more than 5 acres of the site has been disturbed, or, if less than 1 acres is disturbed, once every 30 days. The site is currently stabilized with vegetation and other cover and the site is inspected monthly.

The results of each onsite inspection will be documented in a report that meets the requirements detailed in the *General Permit* guidance. The *qualified professional* will notify Breeze-Eastern, One Robert Lane LLC (the future owners of the site), and their associated subcontractors, if necessary, of any corrective actions that may be required to maintain compliance with the SWPPP within one day of their discovery.

3.3 SUPPLEMENTAL GROUNDWATER INVESTIGATION

WSP will conduct supplemental groundwater investigation activities at the former TTC facility. The work includes direct-push-based groundwater profiling at onsite locations along transect lines oriented perpendicular to the groundwater flow, and the concurrent collection of groundwater samples from select onsite wells. The intent is to characterize both the horizontal and, through the collection of multiple samples per profile boring, vertical extent of TCE-affected groundwater at the site. The data from these profiles (and the wells) will be used to refine the delineation of the plume and will aid in the identification and screening of potentially-applicable remedial technologies and development of the proposed remedial alternative.

The groundwater profiling scope of work is presented below. The groundwater monitoring well sampling for the supplemental investigation is consistent with the description of monitoring activities elsewhere in this plan and, thus, is not presented in this section for clarity.

3.3.1 GROUNDWATER PROFILING

The planned onsite groundwater profile borings will be installed using a direct-push drilling rig equipped with 2.25-inch diameter drilling rods, a Geoprobe® screen point 15 groundwater sampler, and an expendable drill point. The drilling rods will be advanced from the ground surface to the bottom of the interval to be profiled: approximately 135 feet bgs (nominally 20 feet below the upper surface of the water table at 115 feet bgs). The rods will be retracted approximately 4 feet to expose the screen point sampler to the surrounding formation and allow groundwater to enter the drill string once the maximum depth has been achieved. A minimum of three rod-volumes of groundwater will be purged from the drilling/sampling apparatus using new polyethylene tubing fitted with a stainless-steel check-ball valve. Analytical samples will be collected using the same polyethylene tubing and stainless-steel check-ball valve once the purge is complete. The drilling rods will then be retracted approximately 10 feet (with the screen point sampler exposed) to the upper sample interval (125 feet bgs) and the purge and sample process repeated.

The analytical samples, including the appropriate quality assurance and quality control (QA/QC) samples, will be placed in the appropriate laboratory-supplied glassware, labeled, and packed in coolers with wet ice. The samples will be shipped via overnight express to an analytical laboratory for analysis of site-specific VOCs (i.e., PCE, TCE, and their breakdown products, *cis*- 1,2-dichloroethene, and vinyl chloride) by EPA Method 8260C.

[12] Defined as a person that is knowledgeable in the principles and practices of erosion and sediment control, such as a licensed Professional Engineer, Certified Professional in Erosion and Sediment Control, Registered Landscape Architect, or other NYSDEC-endorsed individuals.

3.4 GROUNDWATER MONITORING

The supplemental groundwater investigation includes groundwater monitoring of select onsite groundwater monitoring wells. The sampling procedures (and the associated hazards), including the deployment of PDB samplers, the monitoring well gauging, and PDB recovery are the same as those used for both onsite and offsite monitoring wells.

3.4.1 GAUGING

The depth-to-groundwater from the monitoring wells in advance of the PDB deployment or recovery[13]. Each well will be uncapped and allowed to stand for a minimum of 15 minutes (for equilibrium with the atmosphere) and then gauged using an electronic water-level indicator. The groundwater elevations will be measured in advance of the PDB sampler recovery and the collection of the analytical samples (described below) to ensure the water levels are at equilibrium with the formation (i.e., they were at static conditions) before the sampler is removed. The depth-to-water measurements will be made to the nearest 0.01-foot using an electronic water level meter with the results recorded in the field notebook.

3.4.2 PASSIVE DIFFUSION BAG GROUNDWATER SAMPLING

Water quality samples will be collected[14] from each monitoring well using PDB samplers. The PDBs consist of 24-inch long, 1.25-inch diameter, heat-sealed, low-density polyethylene bags that will be pre-filled by the laboratory with 220 milliliters of laboratory-grade analyte-free, de-ionized water. The samplers will be suspended at the midpoint of the screened interval in each well a minimum of two weeks in advance of the sample recovery (and the planned groundwater profile investigation) to allow equilibration with the surrounding formation water. Upon retrieval, each bag will be sliced open at one end using decontaminated field scissors, and the contents poured into the appropriate laboratory-supplied, pre-cleaned sample vials. The samples will be labeled, packed on ice, and shipped to the analytical laboratory for analysis of site-specific VOCs by EPA Method 8260C, consistent with the groundwater profile work.

3.5 SURFACE SOIL SAMPLING

WSP will implement a soil sampling program at the site to address the concern of potential lead impact to the soil at the site associated with the water tank replacement. The sampling will include the collection of 5 composite surface soil samples after the tower deconstruction activities have been completed. The pre-deconstruction sampling will assess the current concentrations of lead (if any) in the soil within the proposed staging area. These data will be compared to the (lead) baseline to assess the potential release of lead. The procedures for the soil sampling at the site are presented below.

3.5.1 SOIL SAMPLING

WSP will collect composite surface soil samples at five locations[15] within the NYAW staging area at the southern end of the site. The samples (including the appropriate QA/QC samples; see below) will be collected from the selected locations using single-use (dedicated) stainless-steel hand tools (spoons or trowels), placed in a stainless-steel mixing bowl, and homogenized in accordance with WSP SOPs. All the surface soil samples will be collected from the 0 to 0.5-foot depth interval of the staging area. The homogenized samples will then be transferred into labeled laboratory-supplied glassware,

[13] The groundwater elevations will be measured in advance of the PDB sampler recovery and the collection of the analytical samples to ensure the water levels are at equilibrium with the formation (i.e., they were at static conditions) before the sampler is removed.

[14] The samplers will be deployed and collected in accordance with the methods outlined in Vroblesky's 2001 *User's Guide for Polyethylene-Based Passive Diffusion Bag Samplers to Obtain Volatile Organic Compound Concentrations in Wells*, the approved 2011 *Residential Reclassification and Feasibility Study Work Plan*, and WSP's SOPs.

[15] The sample locations, selected to provide a representative assessment of the post-deconstruction lead content of the soil, are detailed in the *Scope of Work for Surface Soil Sampling in Support of Water Tower Replacement*, dated August 30, 2019. The locations are not shown or discussed for clarity.

placed on wet ice (for preservation), and shipped to the analytical laboratory for analysis of lead by EPA Method 6010/7000 series.

4 JOB HAZARD ANALYSIS

WSP has completed a Job Hazard Analysis (JHA) for each task detailed in the *Proposed Activities* Section above. The JHA is an evaluation of the risks associated with the proposed work. The analysis considers the impacted media likely to be encountered during the work and the associated physical, chemical, and environmental hazards; and the severity and the likelihood that the identified hazards will impact WSP personnel (i.e., the baseline risk). The JHA also includes task-specific measures and procedures (i.e., control measures) that are designed to mitigate or eliminate the identified hazards. These measures range from recommendations to use the proper lifting technique when handling heavy items to guidance on the use of personal protective equipment to minimize chemical or physical hazards.

The generalized hazardous associated with each task in the proposed activities is presented below. The risk evaluation for each task, including the baseline *Risk Score* and the controlled *Risk Score*, is presented in a JHA form in Appendix C.

WSP has also included guidance associated with the *Novel Coronavirus 2019,* which is a pandemic at the time this HASP was prepared. The guidance associated with the virus is presented in Section 4.5 below.

4.1 HAZARD EVALUATIONS

WSP identified the following (generalized) hazards and risks associated with proposed work outlined above.

Table 4.1.1 Impacted Media

Impacted Media ("X" indicates impacted media)		Tasks
X	Soil	Supplemental groundwater investigation; storm water pollution prevention plan inspections; surface soil samples
	Sediment	
X	Groundwater	Supplemental groundwater investigation; groundwater monitoring
	Surface Water	
X	Air/Vapor	Annual vapor monitoring and mitigation; supplemental groundwater investigation; groundwater monitoring
	Building Materials (e.g., concrete, paint)	
	Non-aqueous Phase Liquid (NAPL)	
	Waste	Supplemental groundwater investigation; groundwater monitoring

Table 4.1.2 Chemical Hazards

Chemical Hazards ("X" indicates chemical hazard)		Tasks
X	Volatile (boiling point less than 250 degrees Celsius [°C])	Annual vapor monitoring and mitigation; supplemental groundwater investigation; groundwater monitoring
	Corrosive (e.g., acids, bases, cement)	
	Flammable (flash point less than 37.8 °C)	
	Combustible (flash point at or above 37.8 °C and below 93.3 °C)	
X	Toxic	Annual vapor monitoring and mitigation; supplemental groundwater investigation; groundwater monitoring; surface soil sampling

Chemical Hazards ("X" indicates chemical hazard)		Tasks
	Reactive (e.g., explosives, oxidizers, reducers, acid sensitive, air sensitive, unstable)	
	Radioactive	

PHYSICAL HAZARDS

- Electrical (fire): Use of electrical power that results in electrical overheating or arcing to the point of combustion or ignition of flammables, or electrical component damage
- Electrical (shock/short circuit): Contact with exposed conductors or a device that is incorrectly or inadvertently grounded
- Ergonomics (strain): Damage of tissue due to overexertion such as strain and sprains, or repetitive motion
- Fall (slip, trip): Conditions that result in falls (impacts) from height or traditional walking surfaces
- Fire/Heat: Temperatures that can cause burns to the skin or damage other organs. Fire requires a heat source, fuel, and oxygen
- Mechanical failure: Typically occurs when devices exceed designed capacity or are inadequately maintained
- Mechanical: Skin, muscle, or body part exposed to crushing, caught-between, cutting, tearing, shearing items or equipment
- Mechanical/vibration (chaffing/fatigue): Vibration that can cause damage to nerve endings, or material fatigue that results in a safety-critical failure
- Noise: Noise levels (> 85 decibels [dBA] 8-hour time weighted averages [TWA]) that results in hearing damage or inability to communicate safety-critical information
- Stuck by (mass acceleration): Accelerated mass that strikes the body causing injury or death
- Struck against: Injury to a body part resulting from contact with a surface in which action was initiated by the person

ENVIRONMENTAL HAZARDS

- Visibility: Lack of lighting or obstructed vision that results in hazards
- Radiation (non-ionizing): Ultraviolet, visible light, infrared, and microwaves that can cause injury to tissue by thermal or photochemical means
- Weather phenomena: rain and thunderstorms, wind, ice, and snow; extreme temperatures (hot and cold)
- Biological hazards: Direct contact with poisonous plants or insects (e.g., poison ivy, biting or venomous ants, chiggers [mite larvae], bees, wasps, yellow jackets, ticks, potentially venomous spiders, and potentially venomous snakes), or, in work within residences or residential areas, encounters with uncontrolled pets.

4.2 HAZARD CONTROLS AND REQUIRED PERSONAL PROTECTIVE EQUIPMENT

Modified Level D PPE has been designated for all tasks and is described below in Table 4.2.1 below. WSP personnel shall be prepared to upgrade to Level C respiratory PPE, if necessary.

Table 4.2.1 Personal Protective Equipment

Type	PPE (list all required PPE)
Respiratory	Level D, upgrade to full-face APR with organic vapor cartridges (as necessary); cloth facemask when working near other WSP personnel, subcontractors or public (viral protection; see Section 4.5 below)
Clothing	Work clothes (e.g., long pants, WSP-branded shirt)

Type	PPE (list all required PPE)
Gloves	Work (hammer drill, if used for indoor air sampling), nitrile (handling sample train for groundwater and soil)
Boots	Steel toe
Hearing protection	Ear plug or muff (hammer drill and work near direct-push drill rig)
Other PPE	Safety glasses

NO CHANGES TO THE SPECIFIED LEVEL OF PROTECTION SHALL BE MADE WITHOUT THE APPROVAL OF THE SITE HEALTH AND SAFETY OFFICER OR THE PROJECT GENERAL SUPERVISOR.

4.3 MONITORING PROCEDURES

Monitoring Equipment ("X" indicates required monitoring equipment)	
X	Photoionization Detector (PID) 10.6 eV (e.g., chlorinated ethenes)
	PID 11.7 eV (e.g., chlorinated ethanes)
	Flame Ionization Detector (FID; e.g., petroleum)
	Particulate Monitor (PM; e.g., metals, polychlorinated biphenyls)
	Combustible Gas Indicator (CGI; combustibles, oxygen, carbon monoxide, hydrogen sulfide)
	Chemical Name Colorimetric Tube (or similar)

Action Levels for Protective Equipment Upgrades (assume all work begins in Level D): ☒ C ☐ B

- All breathing zone monitoring will be conducted continuously (except when using colorimetric tubes); and,
- All battery-operated equipment will undergo a battery check and will be calibrated per the manufacturer's recommendations.

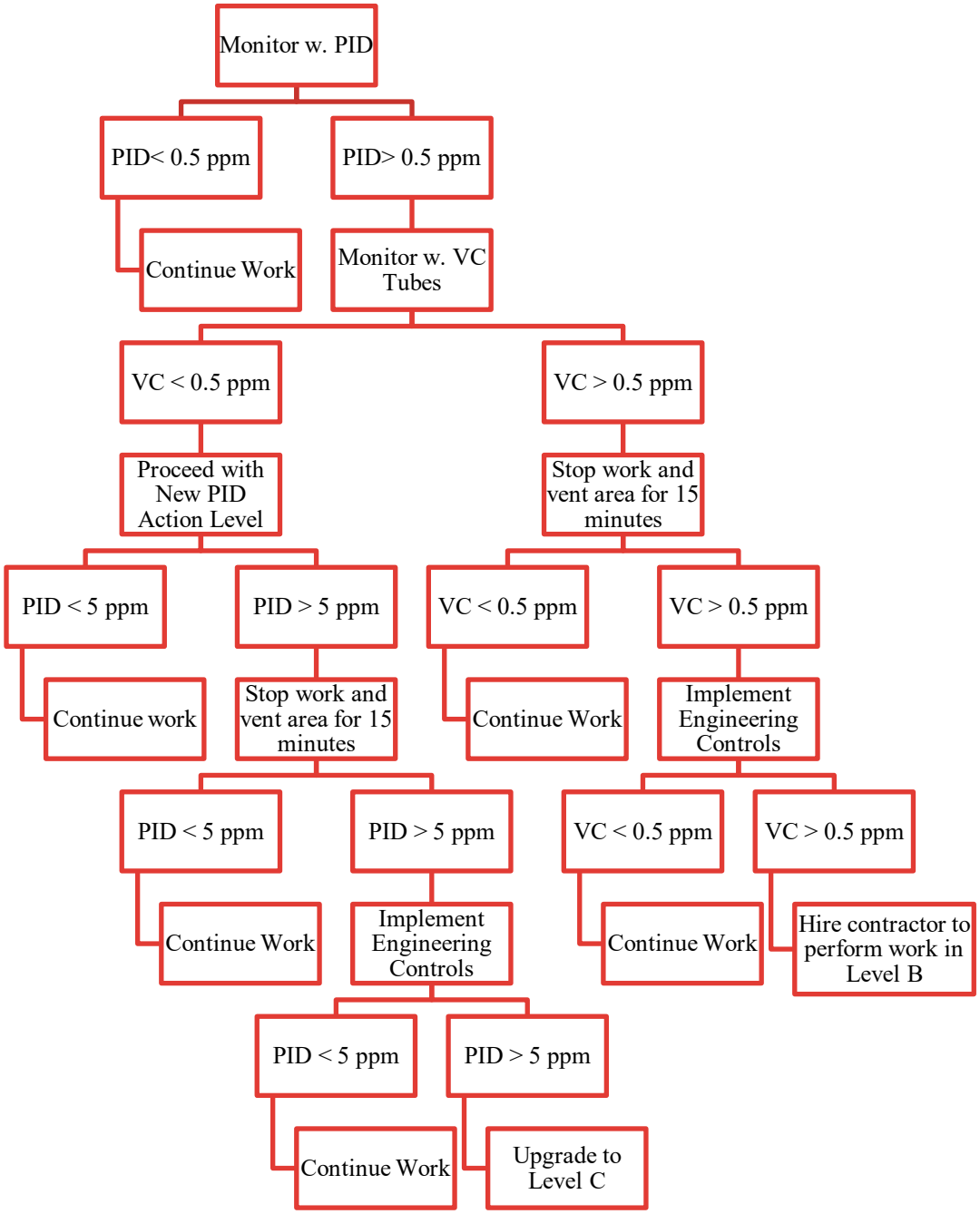
4.4 ACTION LEVELS

Chlorinated VOCs are the primary concern at the site and, thus, the basis for the monitoring and the associated action levels. Those action levels are:

- **0.5 parts per million (ppm),** based on half the Threshold Limit Value (TLV) for **vinyl chloride** (VC; 1 ppm);
- **5 ppm**, based on half the TLV for TCE (10 ppm), the VOC with the next most stringent TLV

Work will be initiated in Level D. The SHSC, or his designated representative, will scan the breathing zone of the workers before and during all proposed activities with a calibrated PID with a **10.6 eV** lamp to monitor levels of organic vapors. Compound-specific monitoring will be performed for **VC** with colorimetric tubes (or similar) if the action level is exceeded. The following tiered monitoring approach (Diagram 1) will be implemented.

Diagram 1 - Tiered Monitoring Approach



The maximum use concentration (MUC) for a full-face air-purifying respirator (APR) calculated for TCE is 250 ppm.

4.5 OTHER HAZARDS

This HASP was prepared during a global pandemic associated with the *Novel Coronavirus 2019* (i.e., COVID 19). The disease caused by the virus is contagious and can result in symptoms that range from no response (i.e., asymptomatic), to relatively mild flu-like conditions[16], to life-threatening cardiovascular problems. Transmission of the virus is via moisture droplets and other airborne particles shed by the infected (during exhalation), which then enter the body of an uninfected individual via the respiratory tract. The risk increases with proximity to infected individuals and is highest for indoor settings. Infection can also be the result of contact with contaminated fluids entering the eyes, nose, or mouth; and, although relatively rare, via contaminated surfaces. Infected individuals can be contagious (reportedly) up to 20 days after the initial exposure to the virus even if they are asymptomatic.

WSP has developed guidelines for field work when required by the client. The guidance, detailed in WSP's *COVID-19 Playbook*, is generalized and includes company-specific requirements for travel and overnight stays that are based on, but may be more stringent than, state or federal recommendations[17]. WSP has also developed an online tool, the *WorkingTogether* Application, that aids in conducting a health self-assessment and tracking individuals who may display symptoms associated with an infection. WSP personnel should review the WSP *Playbook* to understand updates to the recommendations and company procedures (including the current position on vaccinations) and complete the *WorkingTogether* form in advance to conducting field work. Both the *Playbook* (with the latest updates) and *WorkingTogether* Application can be accessed at the following path on WSP's intranet:

http://intranet.wspgroup.com/en-GB/WSP-PB-USA/USA/Corporate-Services/Health--Safety/Coronavirus-Disease-2019-COVID-19-/).

The site-specific guidance relative to the work described in this HASP are presented below.

4.5.1 GENERAL

The work detailed in the *Current Onsite Activities* above includes risk to potential virus exposure. Two of the activities, the SWPPP inspections and the groundwater monitoring, are generally conducted by one or two WSP personnel outdoors with minimal personal contact between the two workers or the public (members of the public are not allowed at the site and the offsite groundwater monitoring work is in the streets surrounding the site). The risk for virus transmission between the individuals is relatively low. Nevertheless, the personnel should follow the guidance for field activities detailed below to minimize the associated hazard.

The two remaining activities have differing levels of potential exposure to the virus. The supplemental groundwater investigation work will be conducted outside with the groundwater profiling restricted to the vacant TTC site; however, the sampling will require a subcontractor crew to operate the direct-push drill rig. The risk for virus transmission is higher than the groundwater monitoring or SWPPP inspection activities due to contact with individuals with another company. WSP personnel selected for this work should, in additional to the guidelines outlined below, maintain a social distance of at least 6 feet and avoid sharing a confined space (e.g., inside of a vehicle) with the subcontractor.

The indoor air and vapor mitigation work has the highest (relative) level of potential exposure to the virus. The work requires entering private residences to conduct the inventory, set-up, and sample retrieval for the indoor air monitoring; or, to inspect the equipment associated with the SSD for those homes that have already been mitigated. WSP personnel should maintain a social distance of at least 6 feet, minimize the amount of time within the homes or in direct contact with the homeowner, and wear a cloth mask.

[16] Symptoms may include (but are not limited to) fever or chills, cough, shortness of breath, fatigue, muscle or body aches, headache, recent loss of taste or smell, sore throat, congestion or runny nose, nausea, vomiting, or diarrhea. WSP personnel should check the *Centers for Disease Control and Prevention* (CDC) for symptom and viral updates before mobilizing to the field.

[17] WSP's approach to COVID-19 is based on the guidance provided by International SOS (iSOS), the Society for Human Resource Management, the U.S. State Department, the CDC, and the World Health Organization.

WSP personnel should review the tasks and the following prior to mobilizing to the former TTC site[18]:

- Review the *COVID-19 Playbook* for the latest updates regarding the virus and the associated recommendations for field work;
- assess your health and, if you are not well, stay home and contact your *Human Resources Business Partner* (HRBP; see WSP's *COVID-19 Playbook* for the HRBP associated with work in the region);
- maintain a social distance of 6 feet or more from other individuals, including other WSP personnel;
- practice good hygiene (e.g., frequent hand washing) and avoid direct contact with others (i.e., no hand shaking); and,
- complete WSP's *WorkingTogether* Application prior to mobilizing to the site and for everyday field work is conducted at the site.

WSP personnel that feel ill after they arrive at the site for field work should self-isolate (i.e., avoid contact with others), and contact their HRBP. Health-compromised employees should not continue field work.

4.5.2 TRAVEL AND FIELD EQUIPMENT

The *Current Onsite Activities* listed above require travel[19] to the site to complete the work. All the work is anticipated to be completed from local (i.e., New York, New Jersey, Massachusetts, or Connecticut) offices reachable by automobile that do not require public transportation. WSP personnel, when traveling by car to the site, should:

- limit the number of individuals in a vehicle being used to mobilize to the site to a maximum of two (healthy) individuals (two vehicles with one person per vehicle is a better approach); and,
- clean and disinfect (to the extent possible) contact points within a rental vehicle such as the steering wheel, gear shifter, directional switches, armrests, radio and climate controls, and door handles.

Similar procedures should be implemented for equipment used in the field, such as water level gauges, PIDs, and water quality meters. Specifically, WSP personnel should:

- minimize contact at the shipping facility (e.g., FedEx) by having the equipment delivered in advance of the project;
- load and unload the equipment away from others (i.e., maintaining social distances of 6 feet or more); and,
- clean and disinfect the equipment before and after use or, if this is not practical, handling the equipment with nitrile, vinyl, or latex gloves (gloves should be worn during the disinfection process).

Ancillary field work, such as filling out the field notebook or observing a subcontractor, should be accomplished within the vehicle, if possible.

The annual vapor mitigation system inspection and indoor air evaluation, and the supplemental groundwater investigation are anticipated to require more than one day at the site. WSP personnel, when staying overnight, should:

- Select a reputable hotel that is cleaning and disinfecting the rooms between each guest and is implementing other protocols (e.g., limited maid service, restrictions on gatherings, etc.) that will aid in guest safety; and,
- Avoid congregating in hotel common spaces, such as bars, restaurants and pools.

The SWPPP inspections and groundwater sampling typically require only one day and, thus, do not require overnight accommodations.

WSP personnel should, in addition to the company recommendations, follow all appropriate public health guidance from your origination of destination area (or both). There may be local travel orders or restrictions requiring proof of vaccination or testing and quarantining procedures for those individuals traveling between states.

[18] Breeze-Eastern does not have a specific pandemic response or requirements for PPE associated with the former TTC site.

[19] Field work requiring air travel or for those projects including an overnight stay must obtain written approval from the WSP Regional President or Business Line Director in advance of mobilizing to the site.

5 DECONTAMINATION PROCEDURES

Decontamination is not required for Level D PPE; however, site workers are expected to shower each night after site activities have occurred, at home or at the hotel. All sampling equipment will be decontaminated in accordance with WSPs SOPs. The rinsate from decontamination procedures will be placed in 55-gallon drums and temporarily stored onsite pending receipt of analytical results to determine the appropriate method of disposal.

WSP personnel should also follow the COVID-19 procedures for personal protection and the cleaning of rental cars and equipment.

6 ONSITE CONTROL

The prevailing wind conditions are not known and will be determined onsite (cardinal direction). No contamination reduction zone or support zone will be established downwind of a work/exclusion zone.

All WSP employees are responsible for onsite control. During work activities, the following zones will be established:

Work/Exclusion Zone – No unauthorized personnel will be permitted within 20 feet of any sampling area.

Contamination Reduction Zone – For this project, all decontamination procedures will be conducted within the work/exclusion zone.

Support Zone – All areas outside of the work/exclusion zones will be treated as a support zone. No work or contaminated materials will be removed from the work area or taken into the support zone.

7 STANDARD OPERATING PROCEDURES

- Whenever possible, use the buddy system.
- At least one WSP employee onsite must have a first aid kit onsite that includes, at a minimum, the following:
  - 1 absorbent compress, 32 sq. in. (81.3 sq. cm.) with no side smaller than 4 in. (10 cm)
  - 16 adhesive bandages, 1 in. x 3 in. (2.5 cm x 7.5 cm)
  - 1 adhesive tape, 5 yd. (457.2 cm) total
  - 10 antiseptic, 0.5g (0.14 fl. oz.) applications
  - 6 burn treatment, 0.5 g (0.14 fl. oz.) applications
  - 4 sterile pads, 3 in. x 3 in. (7.5 x 7.5 cm)
  - 1 triangular bandage, 40 in. x 40 in. x 56 in. (101 cmx 101 cm x 142 cm)
- Conduct a pre-entry (i.e., tailgate) briefing before beginning site activities each day and record in field book.
- Practice good work practice controls: Never sit down or kneel in contaminated areas; never lay equipment on the ground where contaminated groundwater or soil may be present; and avoid unnecessary contact with onsite contaminated objects.
- Do not eat, drink, or use tobacco products outside the designated support zone(s).
- Whenever possible, do not use contact lenses while onsite.
- Thoroughly wash hands and face before eating, drinking, etc.
- Keep copies of the HASP available in the support zone.
- In the event PPE is ripped or torn, stop work and remove and replace PPE as soon as possible.
- In the event of direct skin contact, immediately wash the affected area with soap and water.
- flush eyes with clean water for 15 minutes to remove any contaminated media.
- Ensure that all subcontractors have a site-specific HASP that is maintained onsite.
- Report all accidents, injuries, and environmental releases as required by the WSP USA Health and Environmental Safety Program.

7.1 WORKING ALONE

Employees should not be set out to work alone in the field whenever possible. This must be considered during the proposal phase of the project. Should lone working be required, the following must be adhered to:

- Section 9.1 includes provisions for communication prior to departure, during the work, and upon completion of the task whether returning to the office or going to another location.
- Section 9.1 shall include specific tasks to be performed while working alone and may require the support of additional personnel should the task not be deemed acceptable as a risk for lone working.
- Project managers must consider the level of competence of the individual being sent to perform the work. Under no circumstances shall interns be sent out to work alone. By signing the HASP, the project manager acknowledges that the appropriate staff is selected for all work especially for lone working conditions.

7.2 CONFINED SPACE ENTRY

No WSP employee may conduct **ANY TYPE** of confined space entries. All non-permit required confined space entries **MUST BE** approved by the Direct of Environment or their designee before any entry attempt is made. Therefore, no attempt will be made to enter any type of confined space without approval.

8 MEDICAL SURVEILLANCE

All employees, regardless of the exposure involved, are required to participate in the medical monitoring program established by WSP. OSHA regulations state that employees involved in certain activities that may expose them to hazardous materials at or above permissible exposure limits (PELs) or above the published exposure limit for greater than 30 days per year, or all employees who wear a respirator are required to participate in the monitoring program.

The purposes of the medical monitoring program are to identify any illness or condition that might be aggravated by exposure to hazardous materials or work conditions; to certify that each employee can use negative-pressure respirators as required by OSHA and withstand heat or cold stress; to ensure that employees are able to physically perform their assigned tasks and to establish and maintain a medical record to monitor for abnormalities that may be related to work exposure that could increase injury risk for the employee. WSP's medical monitoring program includes the following:

- a baseline physical examination
- annual physical examination
- a medical determination of fitness for duty, including work restrictions after any injury or illness that may affect employee safety
- a review of potential exposures to determine the need for specific biological and medical monitoring

List any site specific medical monitoring/needs here, based on the hazard analysis, if applicable:

(e.g., severe allergies of site personnel to flora/fauna, need for an epinephrine pen, additional testing during annual physicals [e.g., Polychlorinated biphenyls, pesticides])

9 COMMUNICATION PROCEDURES

All onsite personnel will practice constant communication with other WSP personnel, subcontractors, and facility personnel during active work. Generally, verbal and/or cellular telephone communication will be used while onsite.

9.1 WORKING ALONE

No employee will be permitted to work alone without the completion of this section. The employee must be familiar with and follow the contact procedures listed below. Specifically, the employee will be required to contact the following:

Prior to departure contact (face-to-face, phone, text message or email)

Dave Bouchard
dave.bouchard@wsp.com
+1 774-413-5109 [direct]
+1 315-374-8494 [mobile]

During work contact (by phone, text message or email morning and mid-day)

Dave Bouchard

Daily upon completion of the task (by phone, text message or email morning and mid-day)

Dave Bouchard

When returned home (by phone, text message or email when arriving at home airport, office, or town/city)

Dave Bouchard

9.2 OTHER COMMUNICATION PROCEDURES

Special Communication Procedures (e.g., two-way radios for large sites with multiple workers):

None

9.3 EMERGENCY HAND SIGNALS

The following standard hand signals will be used in case injury or circumstance does not allow for verbal or other communication:

- Hand gripping throat = Out of air, can't breathe
- Grip partner's wrist or both hands around waist = Leave area immediately
- Hands on top of head = Need assistance
- Thumbs up = Ok, I'm all right, I understand
- Thumbs down = No, negative

10 EMERGENCY PROCEDURES

The following standard emergency procedures will be used by onsite personnel. First, WSP employees will review the emergency action plan (EAP) for any active site to be familiar with evacuation procedures established by the facility. While onsite, the site health and safety coordinator shall be notified of any onsite emergency and shall be responsible for ensuring that the appropriate procedures are followed.

10.1 AIR RELEASE OR FIRE/EXPLOSION

On notification of an air release or a fire/explosion, all personnel will travel at a right angle to the upwind direction. The site health and safety officer will then account for all personnel and notify the proper emergency agencies.

If the site health and safety officer is not available, the task manager or appropriate field personnel will assume these responsibilities.

10.2 PERSONAL INJURY IN THE WORK/EXCLUSION ZONE WITH BUDDY SYSTEM/ONSITE CONTRACTOR

If onsite personnel require emergency medical treatment, and the buddy system is used, the following steps will be taken:

- evaluate the nature of the injury and obtain the onsite copy of this HASP
- contact local emergency service
- decontaminate to the extent possible before administration of first aid
- stay with the injured person

10.3 PERSONAL INJURY IN THE WORK/EXCLUSION ZONE WHILE WORKING ALONE

If onsite personnel are working alone, the following steps will be taken before beginning work each day:

- A cellular telephone MUST be kept with the employee always (before starting work, ensure that there is emergency service at a minimum).
- Inform an onsite contact (if they will be present throughout all active work activities) or senior member of WSP of your plans for the day and your expected active work schedule.

If an injury has occurred:

- Evaluate the injury and decide whether emergency services are required.
- Contact emergency services, if necessary, with cell phone.
- If emergency services are not necessary, attempt first aid alone or contact an onsite contact or WSP contact for assistance.

10.4 BASIC FIRST AID PROCEDURES

- Skin Contact: Remove any contaminated clothing. Wash immediately with water for at least 15 minutes.
- Inhalation: Remove from contaminated atmosphere. Contact emergency services.

- Ingestion: Never induce vomiting on an unconscious person. Never induce vomiting when acids, alkalis, or petroleum products are suspected. Contact the poison control center.

10.5 PERSONAL PROTECTIVE EQUIPMENT FAILURE

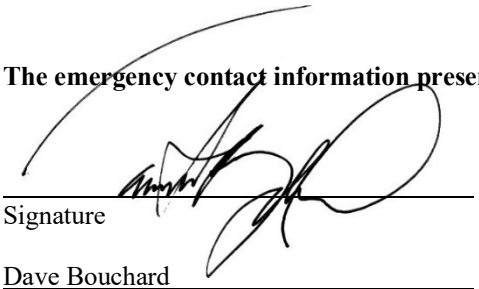
If any worker experiences a failure or alteration of protective equipment that affects the protection factor, that person and his or her buddy shall immediately leave the exclusion zone. Reentry shall not be permitted until the equipment has been replaced or repaired.

11 EMERGENCY CONTACT INFORMATION

Table 11.1 Emergency Contact Information

Local Ambulance Company Phone Number:	911 or +1 516-719-5000, North Shore-LIJ Center for Emergency Medical Services
Hospital/Emergency Room Name:	Glen Cove Hospital
Phone Number:	+1 516-674-7300
Hospital Address:	101 St. Andrews Lane, Glen Cove, NY 11542
Hospital Services verified by:	Dave Bouchard
Local Police Phone Number:	911 or +1 516-676-1000 (non-emergency)
Local Fire Department Phone Number:	911 or +1 516-676-0366 (non-emergency)
State Poison Control Center Phone Number:	+1 800.222.1222

The emergency contact information presented above was verified by:



Signature

Dave Bouchard
Name

Senior Project Director
Title

09/01/22
Date

A map providing the route to the nearest emergency medical care is provided in Appendix D.

12 CERTIFICATION AND SIGNATURES

All site personnel MUST sign this page to acknowledge the requirements of this HASP.

SIGNATURE	NAME	DATE	TITLE

13 ACRONYM LIST

APR	air-purifying respirator
bgs	below ground surface
CCR	Construction Completion Report
CDC	Centers for Disease Control and Prevention
CGI	combustible gas indicator
cis-1,2-DCE	*cis*-1,2-dichloroethene
COVID-19	Novel Coronavirus 2019
dba	decibels
EAP	emergency action plan
EPA	U.S. Environmental Protection Agency
FID	flame ionization detector
HASP	health and safety plan
iSOS	International SOS
JHA	Job Hazard Analysis
MUC	maximum use concentration
NAPL	Non-aqueous Phase Liquid
NIOSH	National Institute for Occupational Safety and Health
NYAW	New York American Water
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
OM&M	operation, monitoring, and maintenance
OSHA	Occupational Safety and Health Administration
OU-1	Operable Unit No. 1
OU-2	Operable Unit No. 2
PAH	polycyclic aromatic hydrocarbons
PCE	tetrachloroethene
PDB	passive diffusion bag
PID	photoionization detector
PEL	permissible exposure limit
PM	particulate monitor
PPE	personal protective equipment
PPM	parts per million
QA/QC	quality assurance and quality control

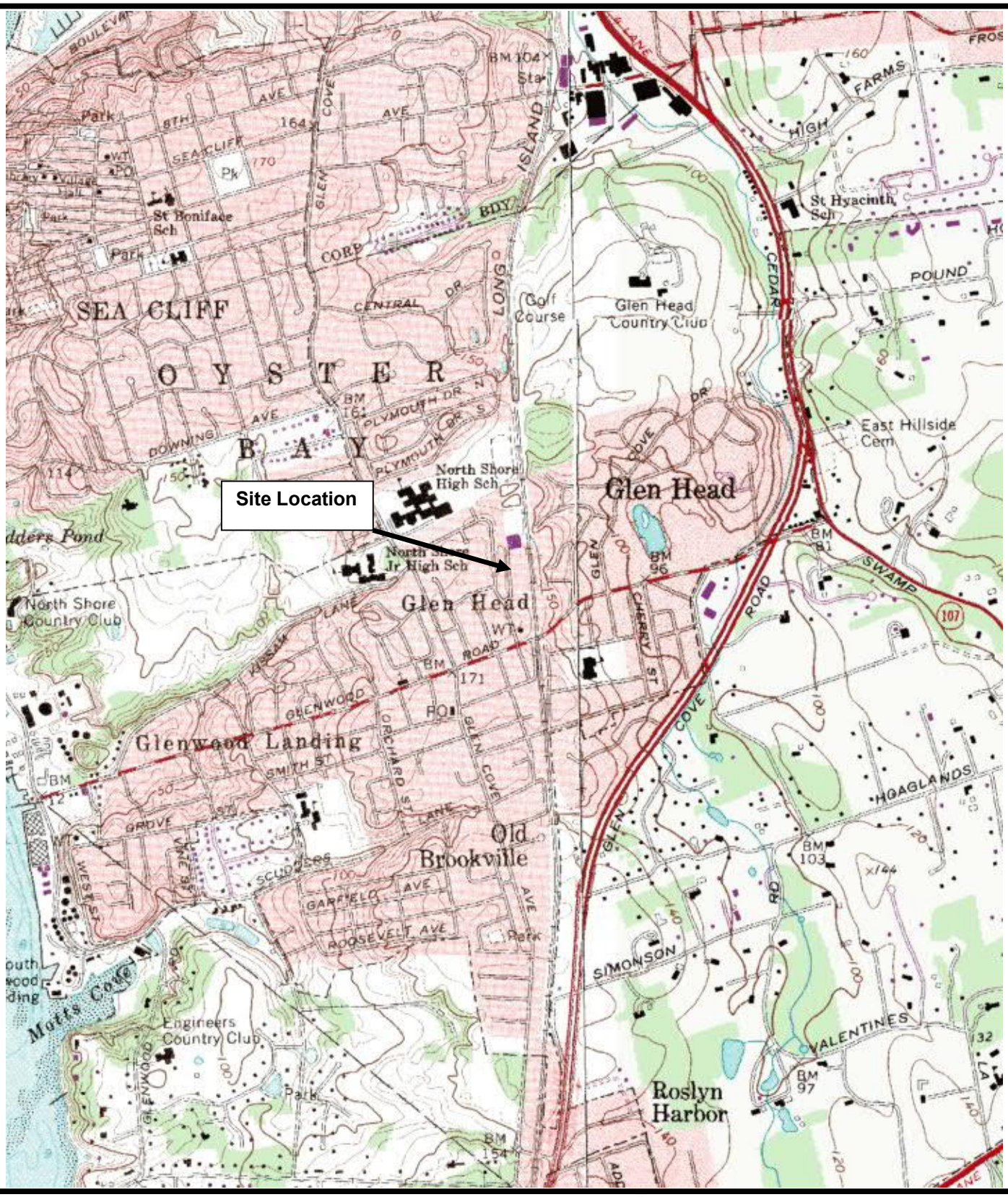
RI/FS	remedial investigation and feasibility study
ROD	Record of Decision
SMP	Interim Site Management Plan
SPDES	State Pollutant Discharge Elimination System
SOP	standard operating procedure
SWPPP	Storm Water Pollution Prevention Plan
TCE	trichloroethene
TLV	Threshold Limit Value
TTC	TransTechnology
TWA	time-weighted average
SHSC	site health and safety coordinator
µg/l	micrograms per liter
VC	vinyl chloride
VOC	volatile organic compound

FIGURES

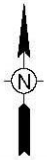
DWG Name:

Checked: Approved:

Drawn By: A



Reference
7.5 Minute Series Topographic Quadrangle
Sea Cliff, New York
Photorevised 1979; Scale 1:24,000



0 1000 2000 4000
SCALE, FEET

WSP USA Inc.
100 SUMMER STREET, 13TH FLOOR
BOSTON, MASSACHUSETTS 02110
TEL: +1 617.426.7330

FIGURE 1

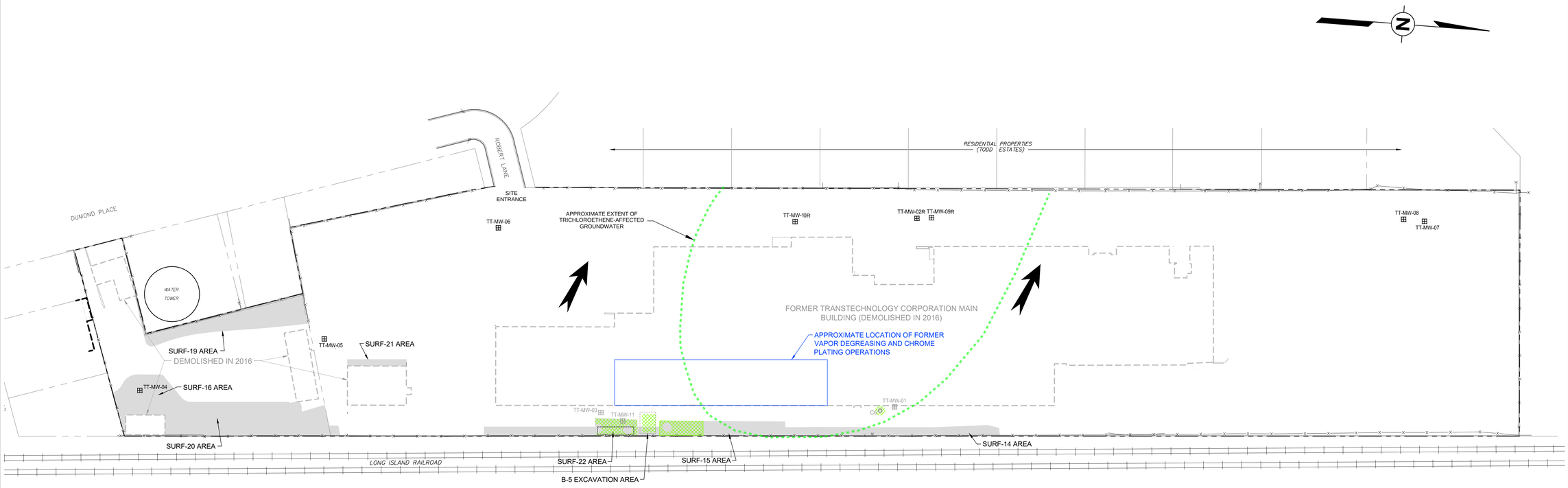
SITE LOCATION MAP

FORMER TRANSTECHNOLOGY CORPORATION
FACILITY — GLEN HEAD, NEW YORK

PREPARED FOR

Breeze-Eastern LLC
Whippany, New Jersey

SHEETS



LEGEND

- TT-MW-09 ⊞ MONITORING WELL (1993–1996)
- TT-MW-03 ⊞ DAMAGED OR DESTROYED MONITORING WELL
- C6 ○ CESSPOOL LOCATION (2001)
- OPERABLE UNIT NO. 1 – SURFACE SOIL EXCAVATION AREA (APPROXIMATE)
- RESIDUAL IMPACTED SOIL OR SEDIMENT (SOIL MANAGEMENT AREA)
- PROPERTY BOUNDARY
- FORMER BUILDING LOCATION
- GROUNDWATER FLOW DIRECTION

THE ORIGINAL VERSION OF THIS DRAWING IS IN COLOR. BLACK & WHITE REPRODUCTION MAY NOT ACCURATELY DEPICT CERTAIN INFORMATION.

50 0 50 100
SCALE, FEET

SAMPLING LOCATIONS ARE APPROXIMATE

REFERENCE:

REMEDIAL INVESTIGATION REPORT, TRANSTECHNOLOGY CORPORATION, GLEN HEAD, NEW YORK SITE, SITE NUMBER 1-30-101, PREPARED BY GEOMATRIX ENGINEERING, LLC, SEPTEMBER 2005.

D

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REVISIONS

REV	DESCRIPTION							
1	Revised:	Chkd:	Appr.:	Revised:	Chkd:	Appr.:	Revised:	Chkd:	Appr.:

SEAL

DATE

DRAWN BY

CHECKED

APPROVED

NOTICE: THIS DRAWING HAS BEEN PREPARED UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER. IT IS A VIOLATION OF LAW FOR ANY PERSON, UNLESS ACTING UNDER THE DIRECTION OF A LICENSED PROFESSIONAL ENGINEER, TO ALTER THIS DOCUMENT IN ANY WAY.

SITE LAYOUT

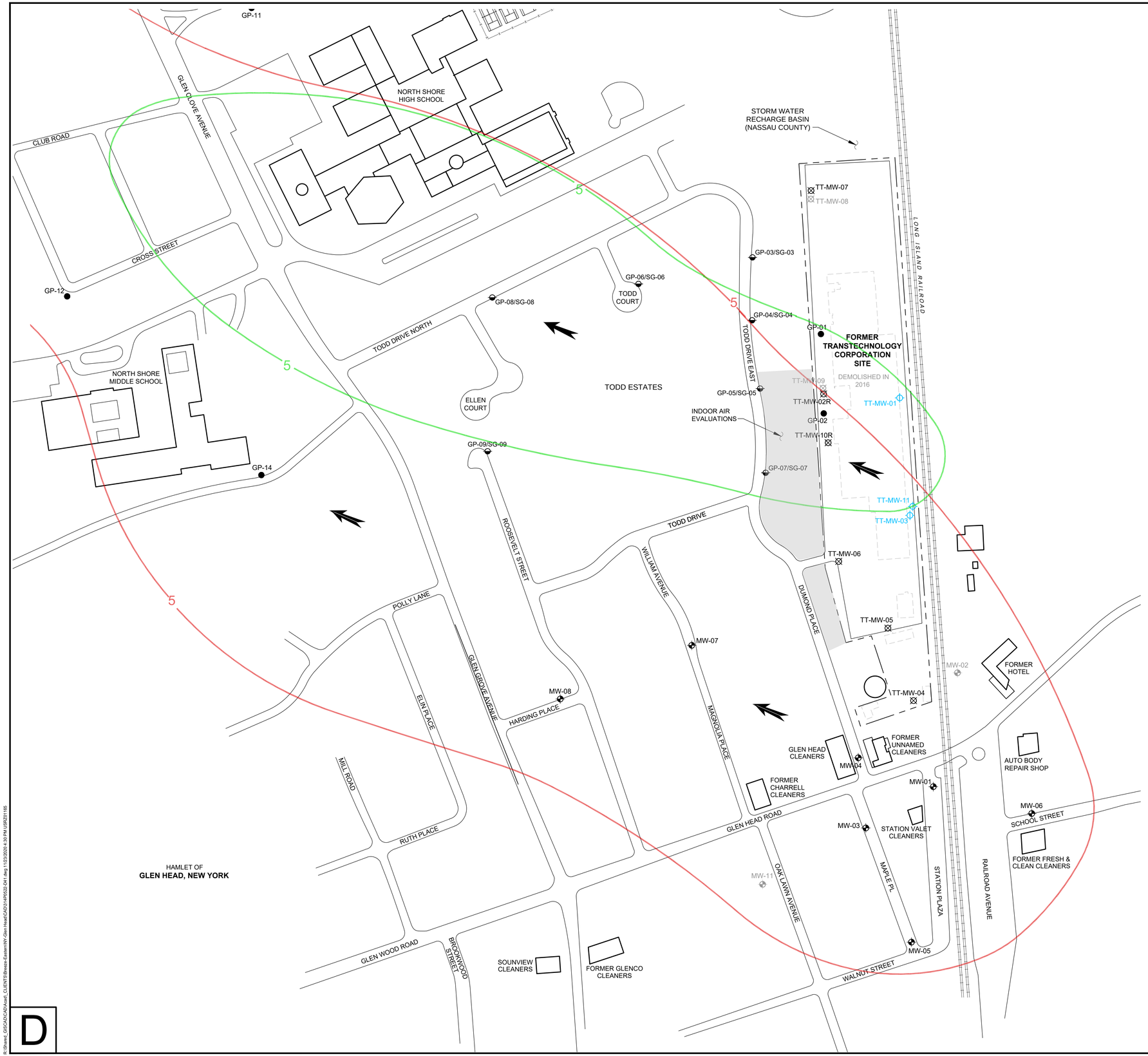
FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

PREPARED FOR
BREEZE–EASTERN LLC
WHIPPANY, NEW YORK

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
BOSTON, MA 02110
TEL: +1 617.426.7330

SHEET 1

Drawing Number
314P0522–D28



LEGEND

- NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION GROUNDWATER MONITORING WELL (HALFTONE WHEN NOT SAMPLED)
- TRANSTECHNOLOGY CORPORATION GROUNDWATER MONITORING WELL (HALFTONE WHEN NOT SAMPLED)
- MONITORING WELL DESTROYED
- CO–LOCATED GROUNDWATER PROFILE AND SOIL GAS SAMPLE
- GROUNDWATER PROFILE LOCATION
- STRUCTURE DEMOLISHED IN 2016
- GROUNDWATER FLOW DIRECTION
- 5 TCE CONCENTRATION COUNTOUR IN MICROGRAMS PER LITER (2012)
- 5 PCE CONCENTRATION COUNTOUR IN MICROGRAMS PER LITER (2012)
- INDOOR AIR EVALUATIONS (2012)

NOTES:

1. ONSITE GROUNDWATER MONITORING WELLS TT–MW–01, TT–MW–03, AND TT–MW–11 WERE INADVERTENTLY DESTROYED DURING THE OPERABLE UNIT NO. 1 REMEDIAL EXCAVATION ACTIVITIES ALONG THE WESTERN PROPERTY LINE IN 2011; ONSITE MONITORING WELLS TT–MW–06, TT–MW–08, AND TT–MW–09 WERE NOT SAMPLED AS PART OF THE OPERABLE UNIT NO. 2 REMEDIAL INVESTIGATION REPORT FOLLOW–UP MONITORING CONDUCTED BETWEEN 2018 AND 2020.
2. OFFSITE GROUNDWATER MONITORING WELL MW–02 IS DAMAGED BELOW THE GROUND SURFACE AND COULD NOT BE ACCURATELY GAUGED OR SAMPLED.

120 60 0 120 240
SCALE, FEET

THE ORIGINAL VERSION OF THIS DRAWING IS IN COLOR. BLACK & WHITE REPRODUCTION MAY NOT ACCURATELY DEPICT CERTAIN INFORMATION.

D

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REVISIONS

REV	DESCRIPTION			
1	Revised:	Chkd:	Appr.:	
2	Revised:	Chkd:	Appr.:	
3	Revised:	Chkd:	Appr.:	

SEAL

DATE

DRAWN BY RKF 11/23/2020
CHECKED
APPROVED AM 11/23/2020

SITE LOCATION AND GROUNDWATER MONITORING WELLS

FORMER TRANSTECHNOLOGY CORPORATION FACILITY
GLEN HEAD, NEW YORK

PREPARED FOR
BREEZE–EASTERN LLC
WHIPPANY, NEW YORK

WSP USA Inc.
100 SUMMER STREET, 13th FLOOR
BOSTON, MA 02110
TEL: +1 617.426.7330

SHEET 2

Drawing Number
314P0522.000–D41

APPENDIX

A WSP PERSONNEL RECORDS

APPENDIX

A-1 HAZWOPER CERTIFICATES

APPENDIX

A-2 FIRST AID CERTIFICATES

APPENDIX

A-3 FIT TESTING FORMS

APPENDIX

B NIOSH POCKET GUIDE TO CHEMICAL HAZARDS

APPENDIX

C JOB HAZARD ANALYSIS

Prepared By:	Prepared Date:
Dave Bouchard	8/19/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
Former TransTechnology Corporation Facility	31400522	1 Robert Lane Glen Head, New York	Surface Soil Sampling	Dedicated (single-use) stainless steel sampling implements (spoons, hand trowel, and mixing bowls); no decontamination necessary

Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
Tetrachloroethene (PCE) and degradation products (trichloroethene, cis-1,2-dichloroethene, and vinyl chloride); lead-impacted soil	None	1.) Vinyl chloride - 0.5 ppm; and, 2.) Trichloroethene - 5 ppm (see action level flow chart)
Level D PPE:	**PPE Upgrades:**	**Health & Safety Equipment:**
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, high visibility vest.	Level C PPE: Full face air purifying respirator, organic vapor cartridges, hooded Tyvek coveralls, chemical resistant gloves and boot covers.	Vinyl chloride colorimetric tubes, photoionization detector (PID), first aid kit, sunscreen, and insect repellent.

Basic Job Step	Potential Hazards (From HASP)																														Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
	Explosion (Chemical Reaction)	Explosion (Over Pressurization)	Electrical (Shock/Short Circuit)	Electrical (Fire)	Electrical (Static)	Electrical (Loss of Power)	Ergonomics (Strain)	Ergonomics (Human Error)	Excavation (Collapse)	Fall (Slip, Trip)	Fire/Heat	Mechanical/Vibration (Chafing/Fatigue)	Mechanical Failure	Mechanical	Noise	Struck By (Mass Acceleration)	Struck Against	Chemical (Toxic)	Chemical (Ignitable)	Chemical (Corrosive)	Chemical (Volatile)	Radiation (Ionizing)	Radiation (Non-Ionizing)	Temperature Extreme (Heat/Cold)	Visibility	Weather Phenomena (Snow/Rain/Wind/Ice)	Biological Hazards (Venomous/Disease-Carrying Animals/Insects, Poisonous Plants)	Severity	Likelihood	Risk Score		Severity	Likelihood	Risk Score	
Mobilize/Demobilize								X		X	X	X	X	X		X								X	X	X		6	3	18	Inspect vehicle for unsafe conditions; stay alert and be aware of other traffic; obey traffic laws; do not drive when tired; reduce speed in inclement weather or poor road conditions; do not drive through standing water; park WSP vehicle outside of work zone.	6	2	12	WSP
Load/Unload equipment							X			X							X						X	X	X	X	X	3	2	6	Use proper lifting techniques; stay alert; park in designated parking/loading area; wear work gloves and steel toe boots; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Collect Surface Soil Samples							X			X											X			X	X		X	X	3	2	6	Follow standard operating procedures (SOPs); stay alert; wear nitrile gloves, steel toe boots, and safety glasses; perform air monitoring as per the Health and Safety Plan (HASP); wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Collect groundwater sample							X			X			X	X		X	X	X		X	X			X	X	X	X	X	3	2	6	Follow SOPs; stay alert; wear nitrile gloves, and steel toe boots and a high-visibility vest (in high traffic areas); perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Decontamination (dedicated, single-use sampling equipment only)										X											X			X	X	X	X	X	3	1	3	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, and safety glasses; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Pack and ship soil samples for analysis							X			X							X	X			X			X	X	X	X	X	3	1	3	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, safety glasses, and a high-visibility vest (in high traffic areas); perform air monitoring as per HASP; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Waste management (minimal waste generation; no containerization anticipated)							X	X		X							X	X	X		X			X	X	X	X	X	2	2	4	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, and safety glasses; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	2	1	2	WSP

Color Key:
§No shading indicates acceptable risk - no action needed.
§Green shading indicates low risk - review the operation/activity and take any steps necessary to reduce & control the risks.
§Yellow shading indicates medium risk - inform H&S management & seek further advice before proceeding any further with the operation/activity.
§Red shading indicates high risk - HALT the activity immediately, review and reduce the risks identified.

Prepared By:	Prepared Date:
Dave Bouchard	8/19/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
Former TransTechnology Corporation Facility	31400522	1 Robert Lane Glen Head, NY	Groundwater Monitoring (Passive Diffusion Bags)	Passive Diffusion Bags; water level meter

Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
tetrachloroethene (PCE) and degradation products (trichloroethene, cis-1,2-dichloroethene, and vinyl chloride).	None	1) Vinyl chloride - 0.5 ppm 2) Trichloroethene - 5 ppm
Level D PPE:	**PPE Upgrades:**	**Health & Safety Equipment:**
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, high visibility vest.	Level C PPE: Full face air purifying respirator, organic vapor cartridges, hooded Tyvek coveralls, chemical resistant gloves and boot covers.	Vinyl chloride colorimetric tubes, photoionization detector (PID), first aid kit, sunscreen, and insect repellent.

Basic Job Step	Potential Hazards (From HASP)																																Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
	Explosion (Chemical Reaction)	Explosion (Over Pressurization)	Electrical (Shock/Short Circuit)	Electrical (Fire)	Electrical (Static)	Electrical (Loss of Power)	Ergonomics (Strain)	Ergonomics (Human Error)	Excavation (Collapse)	Fall (Slip, Trip)	Fire/Heat	Mechanical (Vibration (Chafing/Fatigue)	Mechanical Failure	Mechanical	Noise	Struck By (Mass Acceleration)	Struck Against	Chemical (Toxic)	Chemical (Ignitable)	Chemical (Corrosive)	Chemical (Volatile)	Radiation (Ionizing)	Radiation (Non-Ionizing)	Temperature Extreme (Heat/Cold)	Visibility	Weather Phenomena (Snow/Rain/Wind/Ice)	Biological Hazards (Venomous/Disease-Carrying Animals/Insects, Poisonous Plants)	Severity	Likelihood	Risk Score		Severity	Likelihood	Risk Score	
Mobilize/Demobilize								X		X	X	X	X	X		X								X	X	X		6	3	18	Inspect vehicle for unsafe conditions; stay alert and be aware of other traffic; obey traffic laws; do not drive when tired; reduce speed in inclement weather or poor road conditions; do not drive through standing water; park WSP vehicle outside of work zone.	6	2	12	WSP
Load/Unload equipment							X			X							X							X	X	X	X	X	3	2	6	Use proper lifting techniques; stay alert; park in designated parking/loading area; wear work gloves and steel toe boots; wear high visibility vest in high traffic areas; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET; inspect and properly secure compressed gas cylinders (used to drive bladder pumps).	3	1	3	WSP
Tailgate meeting (daily)										X														X	X		X	X	3	1	3	Wear steel toe boots; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Deploy Passive Diffusion Bag Samplers							X			X											X			X	X	X	X	X	3	2	6	Follow standard operating procedures (SOPs); stay alert; wear nitrile gloves, steel toe boots, safety glasses, and high-visibility vest (in high traffic areas); perform air monitoring as per the Health and Safety Plan (HASP); wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Collect groundwater sample							X			X			X	X		X	X	X			X	X		X	X	X	X	X	3	2	6	Follow SOPs; stay alert; wear nitrile gloves, and steel toe boots and a high-visibility vest (in high traffic areas); perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Decontamination										X											X			X	X	X	X	X	3	1	3	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, safety glasses, and a high-visibility vest (in high traffic areas); perform air monitoring as per HASP; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP

Color Key:
§No shading indicates acceptable risk - no action needed.
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§Yellow shading indicates medium risk - inform H&S management & seek further advice before proceeding any further with the operation/activity.
§Red shading indicates high risk - HALT the activity immediately, review and reduce the risks identified.

Prepared By:	Prepared Date:
Dave Bouchard	8/19/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
Former TransTechnology Corporation Facility	31400522	1 Robert Lane Glen Head, NY	Groundwater Monitoring (Passive Diffusion Bags)	Passive Diffusion Bags; water level meter

Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
tetrachloroethene (PCE) and degradation products (trichloroethene, cis-1,2-dichloroethene, and vinyl chloride).	None	1) Vinyl chloride - 0.5 ppm 2) Trichloroethene - 5 ppm
Level D PPE:	**PPE Upgrades:**	**Health & Safety Equipment:**
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, high visibility vest.	Level C PPE: Full face air purifying respirator, organic vapor cartridges, hooded Tyvek coveralls, chemical resistant gloves and boot covers.	Vinyl chloride colorimetric tubes, photoionization detector (PID), first aid kit, sunscreen, and insect repellent.

Basic Job Step	Potential Hazards (From HASP)																																Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
	Explosion (Chemical Reaction)	Explosion (Over Pressurization)	Electrical (Shock/Short Circuit)	Electrical (Fire)	Electrical (Static)	Electrical (Loss of Power)	Ergonomics (Strain)	Ergonomics (Human Error)	Excavation (Collapse)	Fall (Slip, Trip)	Fire/Heat	Mechanical/Vibration (Chafing/Fatigue)	Mechanical Failure	Mechanical	Noise	Struck By (Mass Acceleration)	Struck Against	Chemical (Toxic)	Chemical (Ignitable)	Chemical (Corrosive)	Chemical (Volatile)	Radiation (Ionizing)	Radiation (Non-Ionizing)	Temperature Extreme (Heat/Cold)	Visibility	Weather Phenomena (Snow/Rain/Wind/Ice)	Biological Hazards (Venomous/Disease-Carrying Animals/Insects, Poisonous Plants)	Severity	Likelihood	Risk Score		Severity	Likelihood	Risk Score	
Color Key: §No shading indicates acceptable risk - no action needed. §Green shading indicates low risk - review the operation/activity and take any steps necessary to reduce & control the risks. §Yellow shading indicates medium risk - inform H&S management & seek further advice before proceeding any further with the operation/activity. §Red shading indicates high risk - HALT the activity immediately, review and reduce the risks identified.																																							
Pack and ship groundwater samples							X			X							X	X			X			X	X	X	X	X	3	1	3	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, safety glasses, and a high-visibility vest (in high traffic areas); perform air monitoring as per HASP; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Waste management							X	X		X	X	X	X	X		X	X	X	X		X			X	X	X	X	X	5	3	15	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, safety glasses, and a high-visibility vest (in high traffic areas); perform air monitoring as per HASP; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	4	1	4	WSP

Prepared By:	Prepared Date:
Dave Bouchard	8/19/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
Former TransTechnology Corporation Facility	31400522	1 Robert Lane Glen Head, NY	Supplemental Groundwater Investigation (Direct-push groundwater profiling)	Direct-push drill rig, dedicated tubing and check-valves (no decontamination required)

Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
tetrachloroethene (PCE) and degradation products (trichloroethene, cis-1,2-dichloroethene, and vinyl chloride).	None	1) Vinyl chloride - 0.5 ppm 2) Trichloroethene - 5 ppm
Level D PPE:	**PPE Upgrades:**	**Health & Safety Equipment:**
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, high visibility vest.	Level C PPE: Full face air purifying respirator, organic vapor cartridges, hooded Tyvek coveralls, chemical resistant gloves and boot covers.	Vinyl chloride colorimetric tubes, photoionization detector (PID), first aid kit, sunscreen, and insect repellent.

Basic Job Step	Potential Hazards (From HASP)																																	Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
	Explosion (Chemical Reaction)	Explosion (Over Pressurization)	Electrical (Shock/Short Circuit)	Electrical (Fire)	Electrical (Static)	Electrical (Loss of Power)	Ergonomics (Strain)	Ergonomics (Human Error)	Excavation (Collapse)	Fall (Slip, Trip)	Fire/Heat	Mechanical/Vibration (Chafing/Fatigue)	Mechanical Failure	Mechanical	Noise	Struck By (Mass Acceleration)	Struck Against	Chemical (Toxic)	Chemical (Ignitable)	Chemical (Corrosive)	Chemical (Volatile)	Radiation (Ionizing)	Radiation (Non-Ionizing)	Temperature Extreme (Heat/Cold)	Visibility	Weather Phenomena (Snow/Rain/Wind/Ice)	Biological Hazards (Venomous/Disease-Carrying Animals/Insects, Poisonous Plants)	Severity	Likelihood	Risk Score		Severity	Likelihood	Risk Score	
Mobilize/Demobilize								X		X	X	X	X	X	X		X								X	X	X		6	3	18	Inspect vehicle for unsafe conditions; stay alert and be aware of other traffic; obey traffic laws; do not drive when tired; reduce speed in inclement weather or poor road conditions; do not drive through standing water; park WSP vehicle outside of work zone.	6	2	12	WSP
Load/Unload equipment							X			X							X							X	X	X	X	X	3	2	6	Use proper lifting techniques; stay alert; park in designated parking/loading area; wear work gloves and steel toe boots; wear high visibility vest in high traffic areas; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Tailgate meeting (daily)										X														X	X		X	X	3	1	3	Wear steel toe boots; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Direct-push drilling (profiling)				X			X			X	X		X	X	X	X	X				X			X	X	X	X	X	4	3	12	Stay alert and maintain distance from the drill rig; wear steel toe boots, hearing protection, safety glasses, and high-visibility vest; perform air monitoring as per the Health and Safety Plan (HASP); wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Collect groundwater sample							X			X								X		X	X			X	X	X	X	X	2	2	4	Follow SOPs for groundwater sampling; stay alert; wear nitrile gloves, and steel toe boots and a high-visibility vest; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	2	1	2	WSP
Decontamination (limited drilling rods/sampler)										X											X			X	X	X	X	X	3	1	3	Follow SOPs and allow subcontractor to decontaminate equipment; stay alert; wear nitrile gloves, steel toe boots, safety glasses, and a high-visibility vest; perform air monitoring as per HASP; ; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP
Pack and ship groundwater samples							X			X							X	X			X			X	X	X	X	X	3	2	6	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, safety glasses, and a high-visibility vest ; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP

Color Key:
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Prepared By:	Prepared Date:
Dave Bouchard	8/19/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
Former TransTechnology Corporation Facility	31400522	1 Robert Lane Glen Head, NY	Supplemental Groundwater Investigation (Direct-push groundwater profiling)	Direct-push drill rig, dedicated tubing and check-valves (no decontamination required)

Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
tetrachloroethene (PCE) and degradation products (trichloroethene, cis - 1,2-dichloroethene, and vinyl chloride).	None	1) Vinyl chloride - 0.5 ppm 2) Trichloroethene - 5 ppm
Level D PPE:	**PPE Upgrades:**	**Health & Safety Equipment:**
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, high visibility vest.	Level C PPE: Full face air purifying respirator, organic vapor cartridges, hooded Tyvek coveralls, chemical resistant gloves and boot covers.	Vinyl chloride colorimetric tubes, photoionization detector (PID), first aid kit, sunscreen, and insect repellent.

Basic Job Step	Potential Hazards (From HASP)																																	Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
	Explosion (Chemical Reaction)	Explosion (Over Pressurization)	Electrical (Shock/Short Circuit)	Electrical (Fire)	Electrical (Static)	Electrical (Loss of Power)	Ergonomics (Strain)	Ergonomics (Human Error)	Excavation (Collapse)	Fall (Slip, Trip)	Fire/Heat	Mechanical (Vibration (Chafing/Fatigue)	Mechanical Failure	Mechanical	Noise	Struck By (Mass Acceleration)	Struck Against	Chemical (Toxic)	Chemical (Ignitable)	Chemical (Corrosive)	Chemical (Volatile)	Radiation (Ionizing)	Radiation (Non-Ionizing)	Temperature Extreme (Heat/Cold)	Visibility	Weather Phenomena (Snow/Rain/Wind/Ice)	Biological Hazards (Venomous/Disease-Carrying Animals/Insects, Poisonous Plants)	Severity	Likelihood	Risk Score		Severity	Likelihood	Risk Score	
Waste management							X	X		X	X	X	X	X		X	X	X	X		X			X	X	X	X	X	5	3	15	Follow SOPs; use proper lifting techniques; stay alert; wear nitrile gloves, steel toe boots, safety glasses, and a high-visibility vest (in high traffic areas); perform air monitoring as per HASP; perform air monitoring as per HASP; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	4	1	4	WSP

Color Key:
§No shading indicates acceptable risk - no action needed.
§Green shading indicates low risk - review the operation/activity and take any steps necessary to reduce & control the risks.
§Yellow shading indicates medium risk - inform H&S management & seek further advice before proceeding any further with the operation/activity.
§Red shading indicates high risk - HALT the activity immediately, review and reduce the risks identified.

Prepared By:	Prepared Date:
Dave Bouchard	8/19/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
Former TransTechnology Corporation Facility	31400522	1 Robert Lane Glen Head, New York	Storm Water Pollution Prevention Plan Inspections	No intrusive activities are planned as part of the inspection regime. No field equipment is required.

Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
Tetrachloroethene (PCE) and degradation products (trichloroethene, cis-1,2-dichloroethene, and vinyl chloride)	None	1.) Vinyl chloride - 0.5 ppm; and, 2.) Trichloroethene - 5 ppm (see action level flow chart)
Level D PPE:	PPE Upgrades:	Health & Safety Equipment:
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, high visibility vest.	Level C PPE: Full face air purifying respirator, organic vapor cartridges, hooded Tyvek coveralls, chemical resistant gloves and boot covers.	photoionization detector (PID), first aid kit, sunscreen, and insect repellent.

Basic Job Step	Potential Hazards (From HASP)																														Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
	Explosion (Chemical Reaction)	Explosion (Over Pressurization)	Electrical (Shock/Short Circuit)	Electrical (Fire)	Electrical (Static)	Electrical (Loss of Power)	Ergonomics (Strain)	Ergonomics (Human Error)	Excavation (Collapse)	Fall (Slip, Trip)	Fire/Heat	Mechanical/Vibration (Chafing/Fatigue)	Mechanical Failure	Mechanical	Noise	Struck By (Mass Acceleration)	Struck Against	Chemical (Toxic)	Chemical (Ignitable)	Chemical (Corrosive)	Chemical (Volatile)	Radiation (Ionizing)	Radiation (Non-Ionizing)	Temperature Extreme (Heat/Cold)	Visibility	Weather Phenomena (Snow/Rain/Wind/Ice)	Biological Hazards (Venomous/Disease-Carrying Animals/Insects, Poisonous Plants)	Severity	Likelihood	Risk Score		Severity	Likelihood	Risk Score	
Mobilize/Demobilize								X		X	X	X	X	X		X								X	X	X		6	3	18	Inspect vehicle for unsafe conditions; stay alert and be aware of other traffic; obey traffic laws; do not drive when tired; reduce speed in inclement weather or poor road conditions; do not drive through standing water; park WSP vehicle outside of work zone.	6	2	12	WSP
Conduct Site Inspection							X			X							X						X	X	X	X	X	3	2	6	Use proper lifting techniques; stay alert; park in designated parking/loading area; wear work gloves and steel toe boots; wear weather-appropriate clothing and use SPF 15 or higher sunscreen; work during daylight hours; use insect repellant containing DEET.	3	1	3	WSP

Color Key:
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§Yellow shading indicates medium risk - inform H&S management & seek further advice before proceeding any further with the operation/activity.
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Prepared By:	Prepared Date:
Dave Bouchard	9/8/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
Former TransTechnology Corporation Facility	31400522	1 Robert Lane Glen Head, NY	Depressurization system Inspections and sub-slab, indoor and ambient air samples	Hammer drill (if temporary sub-slab points are used for sampling), hand pump or syringe, Tedlar® bags, tubing, silicone stoppers (for temporary sub-slab sample points, if used), modeling clay, tubing cutter, compressed helium, helium detector, metal shroud for leak testing, sample canister

Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
tetrachloroethene (PCE) and degradation products (trichloroethene, cis-1,2-dichloroethene, and vinyl chloride).	Working in homes (pets, people, structures not to code)	1) Vinyl chloride - 0.5 ppm 2) Trichloroethene - 5 ppm
Level D PPE:	**PPE Upgrades:**	**Health & Safety Equipment:**
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, hearing protection	Level C PPE: Full face air purifying respirator, organic vapor cartridges.	Vinyl chloride colorimetric tubes, photoionization detector (PID), first aid kit, sunscreen (as necessary), insect repellent (as necessary)

Basic Job Step	Potential Hazards (From HASP)																													Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
	Explosion (Chemical Reaction)	Explosion (Over Pressurization)	Electrical (Shock/ Short Circuit)	Electrical (Fire)	Electrical (Static)	Electrical (Loss of Power)	Ergonomics (Strain)	Ergonomics (Human Error)	Excavation (Collapse)	Fall (Slip, Trip)	Fire/Heat	Mechanical Vibration (Chafing/Fatigue)	Mechanical Failure	Mechanical	Noise	Struck By (Mass Acceleration)	Struck Against	Chemical (Toxic)	Chemical (Ignitable)	Chemical (Corrosive)	Chemical (Volatile)	Radiation (Ionizing)	Radiation (Non-Ionizing)	Temperature Extreme (Heat/ Cold)	Visibility	Weather Phenomena (Snow/Rain/Wind/Ice)	Biological Hazards (Venomous/Disease-Carrying Animals/Insects, Poisonous Plants)	Severity	Likelihood	Risk Score	Color Key: §No shading indicates acceptable risk - no action needed. §Green shading indicates low risk - review the operation/activity and take any steps necessary to reduce & control the risks. §Yellow shading indicates medium risk - inform H&S management & seek further advice before proceeding any further with the operation/activity. §Red shading indicates high risk - HALT the activity immediately, review and reduce the risks identified.	Severity	Likelihood	Risk Score	
Mobilize/Demobilize								X		X	X	X	X	X		X	X						X	X	X	X		6	3	18	Inspect vehicle for unsafe conditions; stay alert; be aware of other traffic; obey traffic laws; do not drive when tired; reduce speed in inclement weather or poor road conditions; do not drive through standing water; park WSP vehicle outside of work zone.	6	2	12	WSP
Load/Unload equipment							X			X			X	X		X	X						X	X	X	X	X	5	2	10	Use proper lifting techniques; stay alert; park in designated parking/loading area; wear work gloves, steel toe boots, and weather-appropriate clothing; work during daylight hours; use SPF 15 or higher sunscreen (as necessary); use insect repellant containing DEET (as necessary).	3	1	3	WSP
Tailgate meeting (daily)										X													X	X	X	X	X	3	1	3	Wear steel toe boots and weather-appropriate clothing; conduct indoors during inclement weather or after dark; use SPF 15 or higher sunscreen (as necessary); use insect repellant containing DEET (as necessary).	3	1	3	WSP
Locate and clear sub-slab location for utilities (indoor sampling only)			X				X	X		X				X													X	3	2	6	Follow SOPs; stay alert; wear steel toe boots and weather-appropriate clothing; inspect work area; communicate with homeowner; be aware of pets and household members.	4	1	4	WSP/Homeowner
Sub-slab depressurization system inspections			X	X			X	X		X	X		X	X	X			X			X						X	5	1	5	Follow SOPs and guidance; stay alert; use proper lifting techniques; wear gloves, safety glasses, hearing protection, and steel toe boots; perform air monitoring as per HASP; wear weather-appropriate clothing; communicate with homeowner; be aware of pets and household members.	4	1	4	WSP/Homeowner
Leak test probe		X																X			X				X			2	2	4	Follow SOPs and guidance; stay alert; use proper lifting techniques; wear gloves, safety glasses, hearing protection, and steel toe boots; perform air monitoring as per HASP; wear weather-appropriate clothing; communicate with homeowner; be aware of pets and household members.	2	1	2	WSP/Homeowner
Purge probe			X	X									X	X			X	X			X				X	X		2	2	4	Follow SOPs and guidance; stay alert; use proper lifting techniques; wear gloves, safety glasses, hearing protection, and steel toe boots; perform air monitoring as per HASP; wear weather-appropriate clothing; communicate with homeowner; be aware of pets and household members.	2	1	2	WSP/Homeowner
Assemble/Disassemble Canisters													X	X			X	X			X				X	X		2	2	4	Follow SOPs and guidance; stay alert; use proper lifting techniques; wear gloves, safety glasses, hearing protection, and steel toe boots; perform air monitoring as per HASP; wear weather-appropriate clothing; communicate with homeowner; be aware of pets and household members.	2	1	2	WSP/Homeowner

Prepared By:	Prepared Date:
Dave Bouchard	9/8/2021
Approved By:	Approved Date:

JOB HAZARD ANALYSIS
WATER & ENVIRONMENT

Project Name:	Project No:	Project Location:	Project/Task Description:	Project/Task Equipment:
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Chemicals of Concern:	Site-Specific Hazards:	Action Levels:
tetrachloroethene (PCE) and degradation products (trichloroethene, cis-1,2-dichloroethene, and vinyl chloride).	Working in homes (pets, people, structures not to code)	1) Vinyl chloride - 0.5 ppm 2) Trichloroethene - 5 ppm
Level D PPE:	**PPE Upgrades:**	**Health & Safety Equipment:**
Weather appropriate clothing, steel-toed safety shoes, work gloves, nitrile gloves, safety glasses/googles, hearing protection	Level C PPE: Full face air purifying respirator, organic vapor cartridges.	Vinyl chloride colorimetric tubes, photoionization detector (PID), first aid kit, sunscreen (as necessary), insect repellent (as necessary)

Basic Job Step	Potential Hazards (From HASP)																													Baseline Risk Score			Hazard Controls Protection Measures	Controlled Risk Score			Persons Affected
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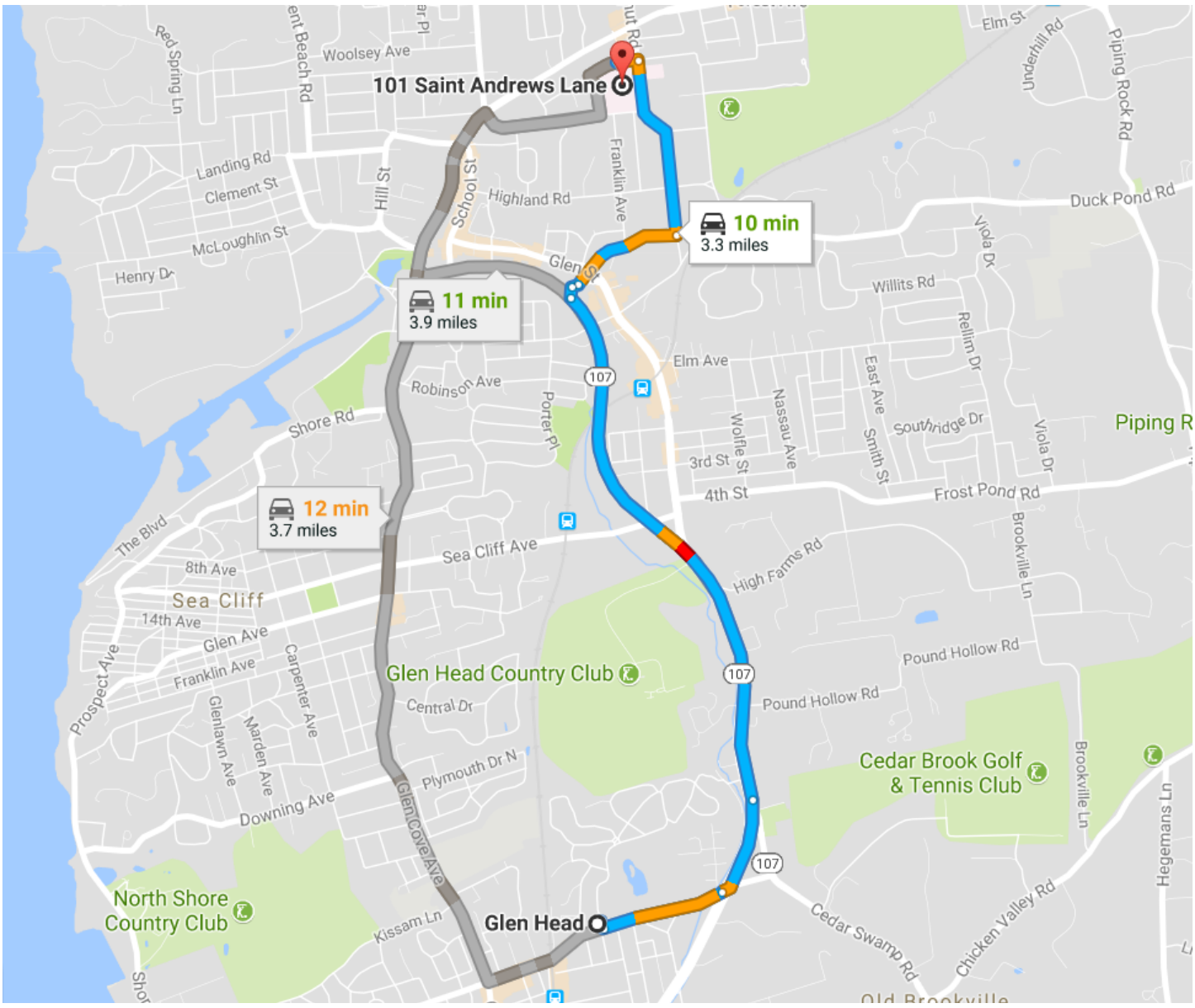
Collect Air Samples														X			X	X			X			X	X				2	1	2	Follow SOPs and guidance; stay alert; use proper lifting techniques; wear gloves, safety glasses, hearing protection, and steel toe boots; perform air monitoring as per HASP; wear weather-appropriate clothing; communicate with homeowner; be aware of pets and household members.	2	1	2	WSP/Homeowner
Restoration														X			X	X			X			X	X				3	2	6	Follow SOPs and guidance; stay alert; use proper lifting techniques; wear gloves, safety glasses, hearing protection, and steel toe boots; perform air monitoring as per HASP; wear weather-appropriate clothing; communicate with homeowner; be aware of pets and household members.	3	1	3	WSP/Homeowner
Decontamination														X			X	X			X			X	X				2	1	2	Follow SOPs and guidance; stay alert; use proper lifting techniques; wear gloves, safety glasses, hearing protection, and steel toe boots; perform air monitoring as per HASP; wear weather-appropriate clothing; communicate with homeowner; be aware of pets and household members.	2	1	2	WSP/Homeowner

APPENDIX

D ROUTE TO NEAREST EMERGENCY MEDICAL CARE



Todd Dr E
Glen Head, NY 11545

1. Head **east** on **Depot Pl** toward **Roslyn Dr**	292 ft
2. Turn right at **Roslyn Dr**	315 ft
3. Turn left at **Glen Head Rd**	0.6 mi
4. Turn left at **Cedar Swamp Rd**	1.0 mi
5. Slight right to stay on **Cedar Swamp Rd**	0.6 mi
6. Continue onto **Glen St**	0.2 mi

7. Turn right at **Pearsall Ave**

0.2 mi

8. Slight left at **Walnut Rd**

0.6 mi

9. Turn left at **St Andrews Ln**
Destination will be on the left

472 ft

B 101 St Andrews Ln
Glen Cove, NY 11542

APPENDIX

G COMMUNITY AIR MONITORING PLAN

APPENDIX G – COMMUNITY AIR MONITORING PLAN

This Community Air Monitoring Plan (CAMP) provides real-time monitoring for volatile organic compounds (VOCs) and particulates (i.e., dust that may contain metals such as chromium, which has been detected in soil samples from the Site) at the upwind (particulates only) and downwind perimeters of property when intrusive activities are being conducted at the former TransTechnology Corporation (TTC) Site. The CAMP is intended to provide a measure of protection for the downwind community (i.e., offsite receptors including residences and businesses) from potential airborne contaminant releases as a direct result of the onsite work activities. The action levels specified herein require increased monitoring, corrective actions to abate emissions, and/or work shutdown. Additionally, this CAMP helps to confirm that work activities have not spread contamination offsite through the air.

Reliance on the CAMP will not preclude simple, common-sense measures to keep VOCs and dust at a minimum around the work areas. **Continuous monitoring will be conducted for all ground intrusive activities, including, but are not limited to, soil excavation, grading, and handling, test pitting or trenching, and the installation of soil borings; or the removal of any impervious cover materials, such as the existing building pads or the surrounding asphalt parking lots.**

Periodic monitoring for dusts and VOCs will be conducted during non-intrusive, ancillary activities such as the collection of soil samples from the excavation or sampling the existing monitoring wells. "Periodic" monitoring during sample collection will consist of taking a reading upon arrival at a sample location, monitoring while overturning soil, and taking a reading prior to leaving a sample location.

G-1 PARTICULATE MONITORING AND ACTION LEVELS

Particulate concentrations should be monitored continuously at the upwind and downwind perimeters of the property at temporary particulate monitoring stations. The particulate monitoring should be performed using real-time monitoring equipment capable of measuring particulate matter less than 10 micrometers in size (PM-10) and capable of integrating over a period of 15 minutes (or less) for comparison to the airborne particulate action level. The equipment must be equipped with an audible alarm to indicate exceedance of the action level. In addition, fugitive dust migration should be visually assessed during all work activities.

- If the downwind PM-10 particulate level is 100 micrograms per cubic meter ($\mu g/m^3$) greater than background (upwind perimeter) for the 15-minute period or if airborne dust is observed leaving the work area, then dust suppression techniques must be employed. Work may continue with dust suppression techniques provided that downwind PM-10 particulate levels do not exceed 150 µg/m3 above the upwind level and provided that no visible dust is migrating from the work area.
- If, after implementation of dust suppression techniques, downwind PM-10 particulate levels are greater than 150 $\mu g/m^3$ above the upwind level, work must be stopped, and a re-evaluation of activities initiated. Work can resume if dust suppression measures and other controls are successful in reducing the downwind PM-10 particulate concentration to within 150 $\mu g/m^3$ of the upwind level and in preventing visible dust migration.

All readings shall be recorded in the field logbook and be available for review by the New York Departments of Environmental Conservation [NYSDEC] and health [NYSDOH], if requested.

G-2 ORGANIC VAPOR MONITORING AND ACTION LEVELS

Volatile organic compounds must be monitored at the downwind perimeter of the property on a continuous basis or as otherwise specified. Upwind concentrations should be measured at the start of each workday and periodically thereafter to establish background conditions, particularly if wind direction changes. The monitoring work should be performed using equipment appropriate to measure the types of contaminants known or suspected to be present. The equipment should be calibrated at least daily for the contaminant(s) of concern or for an appropriate surrogate. The equipment should be capable of calculating 15-minute running average concentrations, which will be compared to the levels specified below.

- If the ambient air concentration of total organic vapors at the downwind perimeter of the work area or exclusion zone exceeds 5 parts per million (ppm) above background for the 15-minute average, work activities will be temporarily halted and monitoring continued. If the total organic vapor level readily decreases (per instantaneous readings) below 5 ppm over background, work activities will resume with continued monitoring.
- If total organic vapor levels at the downwind perimeter of the work area or exclusion zone persist at levels more than 5 ppm over background but less than 25 ppm, work activities will be halted, the source of vapors identified, corrective actions taken to abate emissions, and monitoring continued. After these steps, work activities will resume provided that the total organic vapor level 200 feet downwind of the exclusion zone or half the distance to the nearest potential receptor or residential/commercial structure, whichever is less - but in no case less than 20 feet, is below 5 ppm over background for the 15-minute average.
- If the organic vapor level is above 25 ppm at the perimeter of the work area, activities will be shut down.

All 15-minute readings shall be recorded in the field logbook and be available for State personnel to review. Instantaneous readings, if any, used for decision purposes shall also be recorded in the field logbook.